



## **NWC response to online survey to inform next NSWG October 2024**

*The National Women's Council (NWC) is the leading national representative organisation for women and women's groups in Ireland, founded in 1973. We have over 190 member groups and a large and growing community of individual supporters. The ambition of the NWC is an Ireland where every woman enjoys true equality and no woman is left behind.*

### **Progress (or lack thereof) in gender equality**

There have been many achievements for women in recent years with progress in the areas of women's health, domestic, sexual and gender-based violence law and policy, employment benefits and the enhanced visibility/representation of women in politics with the introduction of gender quotas in national elections. Over 170M has been invested in women's health since 2020<sup>1</sup>, and we have seen record levels of funding allocated to tackling violence against women with a budget of €67M for Cuan (the new DSGBV agency) in 2025.<sup>2</sup> A number of employment benefits and entitlements have been introduced, including most recently, enhancements to family leave with increases to maternity, paternity, parent's and adoptive benefit. Despite such change, further improvements in women's rights is essential to ensure true and full equality for all women and girls.

Women and girls continue to face significant social and economic inequalities, with marginalised women facing additional challenges. Women are facing a housing and homelessness crisis, a cost-of-living crisis, a public services crisis in terms of access to essential services like childcare, health and social care – and the ongoing effects of the climate and biodiversity emergency. Ireland has one of the highest rates of female homelessness in the EU<sup>3</sup>, with particular groups of marginalised women facing additional barriers to secure housing and accommodation. The deprivation rate for women in Ireland is higher (18.7%) compared to the overall population (17.3%)<sup>4</sup>. This is further compounded by an existing gender pay gap of almost 10%<sup>5</sup>. All of these crises hit women harder, because women continue to have lower incomes, less wealth, fewer resources, all while shouldering the greater share of unpaid care responsibilities. Violence against women is at epidemic levels, demonstrating a substantial gap between progressive laws and policy and the reality on the ground. In 2023, Women's Aid saw the highest disclosures of domestic violence ever recorded by the organisation in 50 years.<sup>6</sup> In the same year, the Gardaí received a domestic abuse call every 10 minutes<sup>7</sup> and

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<sup>1</sup> Department of Health. (2024). *Women's health action plan 2024-2025: Phase 2 – An evolution in women's health*. Government of Ireland.

<sup>2</sup> Government of Ireland. (2024, October 1). [Minister McEntee secures record €3.9bn budget](#).

<sup>3</sup> Bretheron, J., & Mayock, P. (2021). [Women's homelessness: European evidence review](#). FEANTSA.

<sup>4</sup> Central Statistics Office. (2024). *Survey on income and living conditions (SILC) 2023: Table 5.1 at risk of poverty, deprivation and consistent poverty rates by demographic characteristics and year*.

<sup>5</sup> Central Statistics Office. (2023). [Gender pay gap from the Structure of Earnings Survey 2022](#). Government of Ireland.

<sup>6</sup> Women's Aid. (2024). [Annual impact report 2023](#).

<sup>7</sup> McDonagh, D. (2024, February 9). [Gardaí received a domestic abuse call every 10 minutes last year](#). *Irish Mirror*.

according to the Sexual Violence Survey published by the Central Statistics office in 2023, 52% of women will experience sexual violence in their lifetime.<sup>8</sup> New and emerging threats for women's rights and equality are on the rise, including online violence against women and far-right activism with its deeply anti-women sentiment.

Despite advancements for women in certain areas, change has been slow and is further compounded by inadequate policy and legislation in certain areas. Where robust legislation or policy are in place, there is often a failure to realise such commitments in full through lack of appropriate resourcing and/or service reform. For example, investment in mental health remains below 6% of the total health budget,<sup>9</sup> significantly short of the 10% recommended by Sláintecare.<sup>10</sup> The persistent lack of new development funding to reform our mental health system, in line with national policy *Sharing the Vision*, critically undermines the Government's commitment to provide gender-sensitive mental health services that meet the needs of all women and girls.<sup>11</sup> Such challenges extend to numerous policies and strategies relating to women's rights and the advancement of gender equality. Only with vision, real ambition, and a commitment to gender equality can we achieve the Ireland we all want to see.

The next National Strategy is pivotal for advancing the rights of all women and girls living in Ireland and the commitments set out in this Strategy have the potential to set us on a path towards real gender equality. The next Strategy must be ambitious in tackling the widespread systemic gender inequalities we face - and fully address the needs of all women and girls in our society. It is imperative that any new strategy include specific commitments with robust actions and indicators and is complemented with appropriate resourcing and an effective and sustained monitoring mechanism to achieve full and successful implementation. The report of the Citizen's Assembly on Gender Equality provides a strong blueprint for achieving a gender equal Ireland, including a clear action plan, with timelines for implementation.

## Progress in selected areas of socio-economic equality, physical and mental health, visibility and participation of women, DSGBV and inclusion of gender equality in law and policy - in advancing gender equality

There has no doubt been significant advances for women in many of these areas. Since the publication of the Women's Health Action Plan in 2022, several key milestones have been achieved in women's health, including the introduction and expansion of the free contraception scheme, investment in publicly funded IVF treatment, the establishment of fertility hubs, gynaecology clinics, menopause clinics and most recently the commitment to roll out free HRT for all women from January 2025. Repeal of the 8<sup>th</sup> Amendment and providing access to abortion was pivotal in placing women's health at the forefront of national conversation and in promoting women's reproductive rights. In the area of violence against women, there are a number of positive legal and policy measures that have been taken by the State including the Third National Strategy (TNS) on domestic sexual and gender-based violence, the expansion and introduction of stronger sentencing on VAW, and the establishment of the statutory agency Cuan dedicated to tackling DSGBV. We have also seen some advancements in the area of employment with new entitlements to unpaid leave,

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<sup>8</sup> Central Statistics Office. (2023). [Sexual violence survey: Disclosure of experiences key findings](#). Government of Ireland.

<sup>9</sup> Department of Health. (2024, October 9). [Minister for Mental Health and Older People announces Budget 2025 funding increases](#). Government of Ireland.

<sup>10</sup> Committee on the Future of Healthcare. (2017). [Sláintecare report](#). Government of Ireland.

<sup>11</sup> Department of Health. (2020). [Sharing the vision: A mental health policy for everyone](#). Government of Ireland.

breastfeeding entitlements in the workplace, paid domestic violence leave for employees and the right to request remote or flexible working as well as investment in reducing childcare costs for families.

Notwithstanding these developments we need to see continued progress to tackle the ongoing systemic inequalities that women and girls face across all domains of society. In the area of health, the State must deliver universal healthcare for all women which appropriately meets their needs. The free contraception scheme must be extended to all ages, beyond the current 17-35 year age cohort, in addition to improved access to timely, safe, local, and quality abortion care for all who need it. Six years after repeal of the 8th Amendment, at least 1,117 women have travelled from Ireland to the UK for an abortion.<sup>12</sup> The development of gender sensitive mental health services is sorely needed, in order to address the particular needs of women and girls. This includes the development of perinatal mental health services, the establishment of a Mother and Baby Unit, a crucial component of the HSE's model of care on perinatal mental health, which has failed to be delivered, and improving access to specialist eating disorder services. There is a fundamental need to ensure that the advancements being made are also benefitting the most marginalised groups of women including migrant women, women experiencing homelessness, LGBTQI+ individuals and disabled women.

In the area of VAW, the Government's TNS is a robust and effective blueprint for tackling DSGBV, however, violence against women in this country is at epidemic levels and there are serious shortcomings in the State's response to how women and children are protected from violence and murder. Disclosures of DSGBV are at record levels, with the DRCC reporting over 18,600 contacts in 2024, the highest-ever level recorded in the service's 45-year history<sup>13</sup>. The National Observatory on Violence Against Women has recommended improved data collection on DSGBV, robust monitoring mechanisms for the TNS, reform of the Court system, and secure multi-annual funding for frontline services (in addition to research and advocacy). At the centre of all of this work must be the inclusion of survivors' voices, with an added focus on the particular needs of marginalised groups of women.<sup>14</sup> These recommendations are echoed in GREVIO's report on Ireland, which underlines the need to bridge the gap between the progressive policies and legislation and the reality on the ground.<sup>15</sup> To achieve this goal the full resourcing and implementation of the third national strategy is necessary, complemented by the ongoing and proper resourcing of the new DSGBV agency.

Women continue to face considerable barriers to employment (primarily due to inaccessible and unaffordable childcare), a gender pay gap of approximately 10%, overrepresentation in low paid, precarious work, underrepresentation in certain sectors, such as STEM (25% female workforce),<sup>16</sup> and challenges in reaching senior leadership positions. Despite the introduction of 40% gender quotas for general elections, challenges persist in achieving equal representation of women in politics, including gender-based abuse, the absence of gender quotas at local level and the lack of family-friendly policies. Overall, women continue to have lower incomes, less wealth, fewer resources, all while shouldering the greater share of unpaid care responsibilities.

It is important to recognise how the advancements and progress for women's rights and equality were made in our society. When we consider the achievements for women in recent years, women's organisations, activists and local groups have been driving and leading the changes. The women's

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<sup>12</sup> Office for National Statistics. (2024). [Abortion statistics for England and Wales 2022](#). Government of the United Kingdom.

<sup>13</sup> Dublin Rape Crisis Centre. (2024). [Annual report 2023](#).

<sup>14</sup> Irish Observatory on Violence Against Women. (2023). [Monitoring report on Zero Tolerance: Implementation of the national strategy to combat domestic, sexual, and gender-based violence](#).

<sup>15</sup> Council of Europe. (2023). [GREVIO's baseline evaluation report on legislative and other measures in Ireland to combat violence against women](#).

<sup>16</sup> O'Reilly, A. (2024, June 28). [Women in STEM: Addressing imbalance is imperative for innovation](#). *The Irish Times*.

movement has strongly advocated for fundamental rights for women and girls in all their diversity, and the National Women's Council has been at the forefront leading many of these campaigns. This has included the roll out of free contraception, access to abortion care, and the introduction of gender quotas for general elections, and expansion of Early Years care and education. Critically, NWC has contributed to the development of progressive policy and legislation on VAW, co-designed with partners, the Third National Strategy and advocated for women to be heard and recognised in our legal system. It was also the many women who from their own devastating experiences became the trailblazers, spoke out on behalf of women, challenged the courts to realise their rights and ultimately put a spotlight on the inequalities women's experience in a manner that could not be ignored by the state.

It is important that we recognise the advancements made, celebrate the gains, the success and the achievements for women, however we must also remember that they have been hard fought and none have come easy. Grassroots campaigns led by women's organisations and wider civil society, have played a critical role in holding Government to account to effect change. It is of critical importance that an ambitious strategy for women and girls is achieved that can be effectively delivered and results in a strong sense of ownership among women's groups and organisations. However, an ambitious strategy alone will not lead to the change we so sorely need. It requires strong and robust monitoring mechanisms and the resourcing of civil society as a key stakeholder in monitoring implementation and maintaining an external pressure on the system to change. The focus on co-design and partnership with civil society through the development of the Third National Strategy on DSGBV and the Women's Health Action Plan has been critical to ensuring the key challenges facing women are being addressed. These processes provide a blueprint for co-design and centring women's voices in the development and delivery of the next National Strategy for Women and Girls.

The stark reality is that women and girls continue to experience significant inequalities across all facets of society. These challenges are clearly recognised by EU and international bodies – most recently by the UN Committee on Economic, Social and Cultural Rights – which expressed concern over substantive inequalities experienced by women, and in particular marginalised groups of women in Ireland. The Committee raised particular concerns with respect to inequalities experienced by women in employment, specifically in relation to the ongoing gender pay and pensions gap. Fundamentally, it identified the need to gender mainstream and budget all policies and programmes to promote full access for all women in employment, social protection, housing, health and education.<sup>17</sup>

There is a real opportunity through the development of a new strategy (building on the existing objectives), the recommendations of the Citizen's Assembly report on gender equality and meaningful engagement with women and women's organisations to tackle these systemic inequalities, and fully realise women's and girls' rights.

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<sup>17</sup> Committee on Economic, Social and Cultural Rights. (2024). [Concluding observations on the fourth periodic report of Ireland](#) (CESCR/C/IRL/CO/4). United Nations.

## Other key areas relating to gender equality

The new Strategy has the potential to expand on the previous strategy objectives on leadership, social and economic issues, visibility and active participation, healthcare, and gender mainstreaming. It must also address gaps in the current strategy in areas such as housing and homelessness, poverty, wider health and social care services, violence against women, among others. In addition, new and emerging challenges for women's rights and equality must be tackled including online violence against women, a rise in far-right activism with its deeply anti-women sentiment, and the unequal impact of climate change on women and marginalised communities.

### Violence Against Women

While the Third National Strategy (TNS) provides a solid and comprehensive framework to address various forms of violence against women, it is crucial to ensure effective coordination and integration with the forthcoming National Strategy for Women and Girls. This alignment is essential for embedding the issue of violence against women within the broader context of advancing women's rights and gender equality. It also acknowledges that violence against women does not occur in isolation but is closely linked to other challenges, such as housing, social protection, and healthcare. A cross-departmental, whole-of-society approach that coordinates and integrates all relevant policies, laws, and legislation is paramount. This approach also supports an intersectional framework, recognising that victims and survivors of DSGBV will often face additional discrimination based on factors such as race, ethnicity, gender, and disability.

It is also essential that all forms of DSGBV are considered in the next National Strategy for Women and Girls. The TNS is ground-breaking in its recognition of the inherent violence and abuse of commercial sexual exploitation of women in the sex trade and the establishment of strategies to ensure those, primarily women, in prostitution have access to safety, health care, support and exit routes. While FGM is recognised as a form of gender-based violence within the TNS, clear and robust actions are needed to effectively respond to this form of violence from prevention, protection, provision of support, prosecution and the promotion of the eradication of FGM. The next National Strategy for Women and Girls must explicitly reflect the comprehensive range of services and supports required for all victims and survivors of DSGBV. This should include a coordinated, multi-agency approach that ensures access to appropriate healthcare, legal assistance, housing, social protection, and psycho-social supports, addressing the diverse needs of survivors in a holistic and intersectional manner.

### Allocate increased multi-annual funding to frontline services, advocacy and research

Despite policy and legislative progress, violence against women continues to be at epidemic levels. In 2023, Women's Aid<sup>18</sup> saw the highest disclosures of domestic violence ever recorded by the organisation in 50 years. In the same year, the Gardaí received a domestic abuse call every 10 minutes<sup>19</sup> and according to the Sexual Violence Survey published by the Central Statistics Office<sup>20</sup> in 2023, 52% of women will experience sexual violence in their lifetime. The TNS provides a strong blueprint for the elimination of violence against all women and girls in Ireland. However, significant

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<sup>18</sup> Women's Aid (2024).

<sup>19</sup> Mc Donagh, D. (2024).

<sup>20</sup> Central Statistics Office (2023).

challenges remain with its implementation, particularly in the areas of data collection and monitoring mechanisms, the inclusion of survivor voices, and the integration of an intersectional lens to meet the needs of all women and girls.<sup>21</sup> The full and effective implementation of the TNS, supported by the full resourcing of the new DSGBV agency, to carry out not only its own functions, but that of vital frontline services is essential.

Specialist services are providing vital supports for survivors, which are key to the implementation of the Zero Tolerance Strategy. They have reported concerns regarding the uncertain and short-term nature of funds allocated to combat DSGBV<sup>22</sup>. Given that organisations provide services to highly vulnerable, hard to reach, minority and minoritised women, funding shortages have a particularly consequential impact on communities that experience intersectional forms of violence. Specialised support organisations and civil society must be adequately resourced through Cuan to meet the increasing demand of services.

### **Key actions/indicators**

- Ensure stronger collaboration across the relevant government departments and bodies to address existing gaps in implementation of the TNS, and facilitate strong co-design and collaboration with civil society organisations to implement the Strategy
- Allocate secure, multi-annual funding to Cuan, to deliver its own functions but also critically to administer the required resources to vital frontline services, research and advocacy
- Commitments under the Strategy by all responsible Departments need to be costed and made transparent so that the Strategy can be realised in full
- Establish robust monitoring mechanisms and data collection strategies to effectively assess implementation of the Strategy
- Develop a DSGBV Data Strategy, coordinated by Cuan for the implementation of a ‘gold standard’ of data collection (incl. disaggregated data) and analysis by all relevant public service bodies
- Pursue the adoption of a targeted National Action Plan to Combat FGM in collaboration with relevant specialist services
- Ensure women in prostitution have access to safety, health care, support and exit routes, in line with the TNS, including the provision of dedicated safe accommodation and access to housing

## **Embed a survivor-centred approach across the justice system**

In 2023, NWC, in partnership with the Department of Justice published *Research on the Intersection of the Criminal Justice, Private Family Law and Public Law Childcare Processes in Relation to Domestic and Sexual Violence*,<sup>23</sup> as part of the actions planned in the implementation of the Zero Tolerance Strategy. This report provides key findings on how victim-survivors’ experiences are not being sufficiently considered in the justice system. This research also highlights the victim’s experience in the court process, which in many cases causes secondary traumatisation. Moreover, the Study on Familicide & Domestic and Family Violence Death Reviews noted that there are high attrition rates in domestic violence cases, related to the lack of progress on completion of criminal cases. High attrition rates for survivors of DSGBV and court delays remain a big concern. These

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<sup>21</sup> Irish Observatory on Violence Against Women (2023).

<sup>22</sup> Ibid.

<sup>23</sup>National Women’s Council & Department of Justice. (2023). [\*Report on the intersection of the criminal justice, private family law, and public law childcare processes in relation to domestic and sexual violence.\*](#)

challenges must be addressed in order to put the needs and voices of survivors at the centre of the justice system.

#### **Key actions/indicators**

- Enhance collaborative practices across the three legal processes/courts regarding domestic and sexual violence (Criminal Justice, Family Law and Child Care Processes)
- Resource court and non-court support for victims-survivors reporting domestic and sexual abuse, including free legal advice, training programmes for those coming into contact with victims-survivors and physical court environments
- Review and reform the in-camera rule to ensure transparency and consistency in decision-making (ensuring women's safety, privacy and anonymity)
- Address the experiences encountered by victims that have a cross-sector attritional effect
- Increase the number of judges, in line with the OECD and the Judicial Planning Working Group report to address one of the main causes of the court system delays and its attritional effect on victims-survivors

### **Deliver more refuge units and secure long-term housing for all victims-survivors**

Domestic abuse is a leading cause of homelessness for women and children in Ireland.<sup>24</sup> Despite the commitment in the Third National Strategy to double the number of refuge units to 280 nationally<sup>25</sup>, this will still fall far short of the Council of Europe guidelines<sup>26</sup>. As of June 2023, there were still nine counties in Ireland without any refuge provision.<sup>27</sup> Refuge provision must be increased in line with CoE guidelines. Additionally, all refuges must be resourced and able to respond appropriately to the intersecting needs of all women and children, including Traveller women, disabled women, migrant women and women exiting prostitution and sex-trafficking.

Moreover, there is an immediate need for a national plan to respond to the interconnected relationship between domestic abuse and homelessness of women and children. Such a response should focus on improving access to safe and stable housing across all housing types (social, private rented and private ownership). Structurally vulnerable victims of DSGBV, such as migrants, ethnic minority groups, members of the LGBTQI+ community and disabled people can face multiple barriers to securing adequate housing when fleeing domestic violence. There are further problems for victim/survivors in accessing suitable long-term housing. The primary and universal barrier for all caught up in the housing crisis is the lack of availability of social housing.

#### **Key actions/indicators**

- Increase domestic violence refuge spaces to the recommended 500 spaces (1 per 10,000), in line with Council of Europe guidelines and to ensure provision in every community across the country
- Deliver access to secure, long-term housing for all victims/survivors of DSGBV through targeted measures and supports
- Reform the Habitual Residence Condition test to ensure that victims-survivors of DSGBV can access housing supports and social protections promptly

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<sup>24</sup> Mercy Law Resource Centre. (2023). [Social housing, domestic violence, and the public sector duty: The legal and policy context.](#)

<sup>25</sup> Government of Ireland. (2022). [Third national strategy on domestic, sexual, and gender-based violence.](#)

<sup>26</sup> Council of Europe. (2023). [Protecting women from violence: Shelter services.](#)

<sup>27</sup> Holland, K. (2024, June 18). [Nine counties have no refuge for women, children suffering domestic violence – SF leader.](#) *The Irish Times.*

## Establish national preventive mechanisms to independently inspect all places of detention and provide full redress to all survivors of institutional abuse

As reported by the IHREC, the State has repeatedly failed to ensure rights-based, independent, survivor-centred, thorough and effective investigations, into allegations of past human rights violations against women and girls.<sup>28</sup> Such historical abuses include the Magdalene Laundries, Mother and Baby Homes, child abuse in schools, foster care and other settings,<sup>29</sup> and the practice of symphysiotomy. The Commission has clearly identified that these abuses of women's rights must be fully investigated by the State in line with international human rights standards.

The implementation of redress schemes has been marked by inadequacies and limitations, creating barriers for women seeking equal access to effective redress.<sup>30</sup> Most recently, the Mother and Baby Institutions Payment Scheme Act 2023 has been designed to minimise financial liability and significantly narrow the eligibility for compensation, including by excluding those who stayed in an institution for less than six months from eligibility for free health services. This reflects a broader governmental approach, which makes successive schemes progressively more limited,<sup>31</sup> and less effective in vindicating the rights of women. It is also imperative that the Inspection of Places of Detention Bill be progressed as a matter a priority to provide for the Inspectorate to become a National Preventive Mechanism, or NPM, with the power to carry out inspections of all Justice Sector places of detention. This will also allow for the ratification of the OPCAT.

### Key actions/indicators

- Establish timely, independent, transparent, thorough, intersectional, and effective survivor-centred investigations for victims/survivors
- Deliver redress schemes which enable victims and survivors to access an effective remedy based on the right to truth, justice, reparation, non-recurrence and memory processes and in line with human rights principles
- Ensure that the national scheme for compensation of victims-survivors of domestic and sexual abuse fulfils the State's EU and international legal obligations and is accessible to, and appropriately accommodates the particular experiences and needs of victims-survivors of domestic and sexual abuse
- Prioritise legislation for the designation of a National Preventative Mechanisms with the power to carry out inspections of all justice sector places of detention.

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<sup>28</sup> Irish Human Rights and Equality Commission. (2022). [Ireland and the International Covenant on Civil and Political Rights](#).

<sup>29</sup> IHREC . (2022). [Ireland and the Rights of the Child](#).

<sup>30</sup> The State has established a range of redress schemes to address historical abuse including the Residential Institutions Redress Scheme, the Magdalene Restorative Justice Scheme, the O'Keeffe Scheme and the Mother and Baby Institutions Payment Scheme. Shortcomings identified in the operation of these redress schemes include an adversarial approach to the provision of redress; an unduly restrictive and narrow approach to the category of 'victim'; a short timeframe to apply to the scheme; overly burdensome standards of proof; low levels of award in comparison to violations suffered; difficulties accessing personal records held in archives; over reliance on the records of religious congregations in making assessments for eligibility; ambiguity about the weight being afforded to the testimony of individuals and/or their relatives; the ex gratia nature of the scheme meaning there is no acknowledgement of the violation of rights; and a requirement to sign a waiver against further legal recourse against state and non-state actors through the judicial process. IHREC, [Submission to the UN Committee against Torture on the List of Issues for the Third Examination of Ireland](#) (2020), pp. 26, 29–30. See also IHREC, [New Redress Scheme for Victims of Historic Schools Abuses Continues to Fail Victims](#) (2021).

<sup>31</sup> Winter's analysis of three statutory redress schemes notes that designers of more recent schemes were instructed to avoid budgetary overruns such as those encountered by the Residential Institutions Redress Board, for example by placing a cap on funding. Stephen Winter, [Monetary Redress for Abuse in State Care](#) (2022), pp. 45-116.



## Support initiatives to tackle misogyny and online hate and violence against women

One of the key pillars of the TNS is prevention – seeking the eradication of the social and cultural norms that underpin and contribute to gender-based violence. The Strategy is excellent in its ambition and recognises that it is only through a society wide effort that we will achieve real change. However, without the proper resourcing and implementation, it cannot be effective. A report of the National Observatory on Violence Against Women and Girls published at the end of 2023<sup>32</sup> highlighted major gaps and progress in the Strategy’s implementation. This included significant challenges in implementation of the pillar on prevention including in tackling the negative influence of pornography, absence of awareness campaigns targeting specific marginalised communities as well as all forms of violence against women, challenges with implementation of the new SPHE curriculum (which has the potential to address issues of gender, gender stereotypes and gender based violence), ensuring online safety for women and girls, and a lack of appropriate training among professionals to best support survivors of DSGBV.

Critically, the TNS and the new DSGBV agency Cuan, must be fully funded to realise the vision of the strategy in full, so that we can take concrete steps to achieving a zero tolerance society. This requires the inclusion of survivor perspectives in the prevention of violence; and the need for robust measurement and data to monitor this pillar of the Strategy effectively and hold government and statutory bodies to account.

### Key actions/indicators

- Fully resource (including through frontline services) and monitor the prevention pillar of the TNS through robust monitoring and data collection mechanisms
- Counter and prevent misogynistic hate crime through the introduction of new hate crime and incitement to violence legislation, complemented with the introduction of a dedicated Action Plan Against Hate to address hate crime and hate speech against women, including women from minority and marginalised groups
- Address and combat the increasing phenomenon of technology-facilitated gender-based violence (TFGBV) in all its guises, particularly in relation to child and intimate image abuse, and take steps to create a safer and more secure digital environment for women and girls and hold perpetrators of TFGBV and the private sector to account

## Housing, Accommodation and Homelessness

### Invest in state-led housing for social, affordable, cost-rental homes and gender proof all housing policies, budgets and services

The housing, homelessness and accommodation crisis continues to have a devastating impact on women and families. Ireland has one of the highest rates of female homelessness in the EU21<sup>33</sup> even while many ‘hidden homeless’ are excluded from official statistics (including women in refuges and Traveller and Roma families forced to live on roadsides).<sup>34</sup> Marginalised groups of women face additional barriers to housing, as outlined below. The recent publication of the Housing Commission’s Report has laid out starkly the accommodation deficit that faces our society – up to a

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<sup>32</sup> Irish Observatory on Violence Against Women (2023).

<sup>33</sup> Bretheron, J., & Mayock, P. (2021).

<sup>34</sup> Cork and Kerry RTAWG (2022) [Traveller Homelessness \(A Hidden Crisis\)](#).

quarter of a million homes.<sup>35</sup> Ireland's housing strategy remains over-reliant on the private sector to build homes and to provide housing through the private rented sector. The state must dramatically increase in its own direct provision of housing, focusing on the provision of social, affordable and cost-rental homes.

#### **Key actions/indicators**

- Increase investment/supply in state led housing to address the current housing deficit
- Increase housing provision towards an ownership target of at least 20% of total housing by Approved Housing Bodies and Local Authorities.
- Implement the recommendations of the Housing Commission report 2024
- Deliver housing policy, budgets and provision which is gender-proofed and ensures secure, affordable accommodation for all women and girls

## **Strengthen tenant's rights**

Historically in Ireland, relatively weak regulation protecting tenants and a power imbalance between their rights and those of landlords, combined with short term leases has led to a widespread view of private rental as the most precarious of tenures. Certain groups in society are disproportionately vulnerable to housing precarity.<sup>36</sup> The current housing crisis, with a lack of housing units, combined with spiralling rent, places tenants at even greater risk of power disparities. One of the most harmful and gendered forms of exploitation is the placing of advertisements by prospective landlords offering discounted or free accommodation in return for sex.

This practice appears to primarily occur when renters are seeking to rent a room from a landlord under a license agreement as opposed to a self-contained dwelling which would be covered by the Residential Tenancies Act (RTA). Marginalised and structurally vulnerable women are amongst those most harmed by sex-for-rent exploitation including those without alternative housing options due to poverty, disability, insecure immigration status, domestic or family violence, debt, a lack of family support or unstable/poorly paid employment.<sup>37</sup> Ensuring women in private rental accommodation are protected from exploitation, are able to live in secure and affordable housing of an adequate standard, and that further numbers entering homelessness are stopped, can only happen if the state takes a more active role in ensuring and strengthening the rights of tenants in both state and private rental accommodation.

#### **Key actions/indicators**

- Introduce a rent freeze and a new system of rent controls, while banning evictions to reduce numbers entering homelessness
- Broaden and strengthen the remit of the Residential Tenancies Board (including to cover issues of sexual harassment within rental housing)
- Increase spending on tenant protections and private rent inspections
- Legislate to bring licensee arrangements under the Residential Tenancy Act
- Legislate to make the proposing of sex for rent arrangements a specific named offence

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<sup>35</sup> Housing Commission. (2023). *Report of the Housing Commission*. Government of Ireland.

<sup>36</sup> Waldron, R., 2023a. *Experiencing housing precarity in the private rental sector during the covid-19 pandemic: the case of Ireland*. *Housing Studies*, [online] 38(1).

<sup>37</sup> National Women's Council of Ireland. (2023). *Sex for rent: Research report*.

## Deliver targeted housing supports for marginalised groups of women

Traveller and Roma women, disabled women, migrant women, older women, victims-survivors of DSGBV, and lone parents all face significant barriers to accessing secure, affordable and safe housing. Domestic abuse is a leading cause of homelessness for women and children.<sup>38</sup> According to Safe Ireland, 180 women and 275 children seek emergency accommodation every month and in 2021 more than 3,000 requests for refuge could not be met by services.<sup>39</sup> Older women are more likely to be living alone than men and are more likely to live in low-quality housing.<sup>40</sup> Migrant women face a range of barriers, with those from outside the EU more likely to live in overcrowded housing and experience homelessness.<sup>41</sup> The State must ensure access to secure long-term housing for marginalised women through targeted measures and supports.

### Key actions/indicators

- Traveller and Roma women: full resourcing of the forthcoming National Traveller and Roma Inclusion Strategy, including actions related to accommodation
- Disabled women: full resourcing of National Housing Strategy for Disabled People Implementation Plan and sufficient funding for all areas of disability housing policy
- Older women: increase investment in housing supports for older people, including a range of housing aid grants and home support grants
- Victim-survivors of DSGBV: Resource an integrated gender-sensitive emergency accommodation response for victim-survivors fleeing violence, including the provision of more refuge units, especially in counties with none available
- Women leaving prison: invest in measures to support the community reintegration of women leaving the criminal justice system and to counter recidivism, particularly those assessed to be low-risk to society, including step-down community-based facilities with supported accommodation and other support services
- Lone parents: reconvene the Family Homeless Prevention sub-group as part of the National Homeless Action Committee and develop a family homelessness action plan

## Deliver Care Services

### Deliver universal rights-based social care that promotes individual autonomy & dignity

There is a crisis in care and support services, with under-resourcing, lack of adequate provision, accessibility issues, and moves towards commodification and corporatisation affecting almost all aspects of care and support provision. This poses significant challenges for disabled people, older persons and their families in accessing care and supports, which appropriately meets their needs. Ongoing challenges are reflected in long waiting lists and geographical blackspots in the availability of home support; a lack of respite support; underinvestment in personal assistance supports; a continued over reliance on acute and residential care and a lack of alternative housing options for individuals to live independently and within the community.

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<sup>38</sup> Mercy Law Centre (2023).

<sup>39</sup> Safe Ireland (2021) [Women's Domestic Abuse Refuges: Submission to Oireachtas Justice Committee.](#)

<sup>40</sup> Age Action (2023) [Spotlight on Income in Older Age.](#)

<sup>41</sup> ESRI (2022) [The integration of non-EU migrant women in Ireland.](#)

The commodification of nursing and home support has led to an expansion in the presence of private, profit driven providers. Increasing public investment in and provision of public care and support services is a vital component of advancing gender inequality. In countries with public care systems, they demonstrate greater affordability, accessibility, and quality in their services, with better pay, security and conditions for workers. Investment in a public system rather than dependence on the market to provide services is crucial. Universal homes and community care and support services which appropriately meet the needs of disabled people and older persons are essential. Supports must be rights-based, person-centred and promote autonomy, independence and dignity of the individual.

## Ensure access to person-centred home support for all who need it

Despite investment in home support in recent years, many older women are not getting the support that they need. There are almost 6,000 people on waiting lists for home support with geographical blackspots in communities across the country.<sup>42</sup> Research and recent reporting has shown significant challenges in accessing home support including long waiting times, red tape and lack of flexibility, task-focused care provision, a move away from domestic support, lack of recognition of psycho-social needs and variability between support services based on geographical location.<sup>43</sup> The provision of high quality, person-centred home support is critical in ensuring that older people can live at home, in their own communities for as long as possible. More specifically and following the recent establishment of the Commission on Care on Older People, there is a real opportunity to bring a gender analysis to the development of health and social care services and consider the particular needs of older women.

The current Programme for Government includes a clear commitment to introduce a statutory scheme to support people to live in their own homes, which will provide equitable access to high quality regulated home care. Legislative issues relating to licencing and regulation of the sector must also be addressed, in addition to ensuring a secure sustainable funding model for home care, a reformed model of service delivery, in addition to tackling issues relating to recruitment and retention. The State must ensure delivery of a rights-based home support scheme, which takes account of the particular needs of women, ensuring quality of access and availability in every community.

### Key actions/indicators

- Introduce licencing, registration<sup>44</sup> and regulation<sup>45</sup> of home support providers
- Fully establish the National Home Support Office
- Continue the roll out of interRAI, as the new standard assessment tool for care-needs in the community
- Implement in full the recommendations of the cross departmental Strategic Workforce Advisory Group to address workforce challenges

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<sup>42</sup> Oireachtas. (2024, June 27). [Dáil Éireann debate: Waiting lists and home support.](#)

<sup>43</sup> Donnelly, S., O'Brien, M., Begley, E. and Brennan, J. (2016) "I'd prefer to stay at home but I don't have a choice" Meeting Older People's Preference for Care: Policy, but what about practice? Dublin: University College Dublin.

<sup>44</sup> The General Scheme to establish a licensing framework for professional home support services delivered in the State - the Health (Amendment) (Licensing of Professional Home Support Providers) Bill 2024 General Scheme - was approved by Government on 14 May 2024. It was referred to the Joint Oireachtas Committee on Health for pre-legislative scrutiny and Department officials met with the Committee on 19 June 2024.

<sup>45</sup> This Bill will provide for the regulation of the sector by HIQA. Final amendments have been made to draft regulations for home support providers following a public consultation and engagement with stakeholder groups. The Department is working with HIQA, which has prepared draft quality standards that are expected to go out for public consultation Q3 2024.

- Deliver on sectoral reform such as payment for travel time for home support providers, paying carers the National Living Wage at a minimum, and bringing legacy rates in line with the new revised rates of funding
- Establish a new model of service delivery, which incorporates a gender dimension

## Legislate for a statutory right to personal assistance

The Personal Assistance Service (PAS) is a valuable support in ensuring disabled people have autonomy over their own lives and can actively participate in all aspects of society. PAS is recognised nationally and internationally as a cost-effective investment to promote inclusion. In the absence of a structured approach to personal assistance, disabled people face barriers in accessing support and limited opportunities to participate in mainstream education, employment, political and community life. Disabled people are often forced to rely on family members which is known to have negative impacts on both the person and family member. ILMI has recommended the establishment of a PAS system that is fair, with clear definitions, and a social-model informed assessment of need which is invested in as a priority for the National Disability Services Action Plan.<sup>46</sup> Critically, all policy and legislative commitments must be truly reflective of the UNCRPD, which embodies an ethos of independent living and the rights of disabled people to live a life of self-determination.

### Key actions/indicators

- Commitment to development of a national PAS service based on the principles of the ILMI PAS NOW campaign
- Commitment to year-on-year increase in PAS hours
- Synchronisation of supports for disabled people to live independent lives from accessing education. Standardise supports in school with PAS by renaming and restructuring SNAs to become PAs in the education system
- Ensure that DPOs are resourced to engage with families so that they become aware of and drive demand for PAS as a transformative enabler of the rights of disabled people and their families
- Ensure that personalised budgets become accessible and readily available for disabled people to manage their own resources to live independent lives

## Provide supported housing options to enable independent living in communities

Housing for All provides a framework to increase and improve housing options for older people to facilitate ageing in place with dignity and independence. It builds on the Housing Options for Older People published jointly by the Department of Health and Housing in 2019. This statement provides policy options in support of a range of housing alternatives/ choices that meet the diverse needs of an ageing population, spanning owner occupier, private rental and social housing, whilst providing accessible care and the associated support needs. Despite policy developments, Age Action's State of Ageing report 2022,<sup>47</sup> examined experiences of older people's housing based on the UN Template for Housing Adequacy. At least 48% of older persons do not have adequate housing, as defined by the UN standard. Significant issues were identified in relation to habitability, accessibility<sup>48</sup> and location

<sup>46</sup> Independent Living Movement Ireland. (2024). [Invest in inclusion: A call to action for disability inclusion in Ireland.](#)

<sup>47</sup> Age Action. (2022). [Reframing ageing: State of ageing in Ireland 2022.](#)

<sup>48</sup> The largest issue is that half of older persons' homes have a Building Energy Rating of E, F or G. The second largest inadequacy is lack of accessibility or adaptation to the needs of older persons with disabilities or mobility impairments, which affects up to 10% of households

(with almost 10% of persons aged 65 or older living in isolated rural areas with limited access to essential services).

Recent developments, including the launch of the Healthy Age Friendly Homes Programme across all 31 local authorities in July 2024 is welcome. However, this must be aligned with clear commitments to ensure access to adequate housing and investment in a range of health and social care services (including home support) to enable independent living in communities for our older population. Critically, the housing needs of older women must be addressed within national social housing policy, recognising the particular challenges that this cohort face. Of critical importance is also ensuring that the voice of the older women is at the centre of decision making on housing and their choice in where and who they wish to live with must take priority.

#### **Key actions/indicators**

- Resource Local Authority Housing Delivery Action Plans which include proposed delivery of housing for older people. Such plans should also take account of the particular needs of older women
- Deliver innovative forms of housing options through enhanced design, construction and grant programmes to facilitate universal, ageing in place and rightsizing options
- Gender proof/impact assess implementation of housing policy and actions to address the particular needs of older women

## Climate Justice

### Develop Climate solutions that Empower Women and Marginalised Communities

The climate crisis will impact us all, but not equally. The concept of climate justice recognises that those who are already marginalised or disadvantaged will bear the worst of the impacts of the climate crisis, and climate change will compound existing inequalities in our society.<sup>49</sup> This includes women and girls in all of their diversity, and risks worsening existing gender inequality. Climate policy which does not pay attention to these uneven impacts will further compound those inequalities – many people cannot afford to purchase an electric vehicle or retrofit their home in the middle of the cost-of-living crisis, particularly women. Irish climate policy must be gender, equality and poverty-proofed to ensure that existing inequalities in our society are reduced, not exacerbated, as we make our green transition.

#### **Key actions/indicators**

- Gender, equality and poverty-proof all climate policies and investment
- Centre economic success on socio-economic and environmental equality and wellbeing

### Recognise Care Work as Essential to a Green Future

Care work is essential work and is also green work, being 26 times greener than manufacturing jobs<sup>50</sup> and requiring no extraction of resources from the Earth. Despite this, care work continues to be poorly paid and gendered work, carried out largely by women and marginalised communities such as

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<sup>49</sup> Dukelow, F., Forde, C. and Busteed, E. (2024) [\*Feminist Climate Justice Report\*](#)

<sup>50</sup> Ibid.

migrants. It is also absent in Irish climate policy, despite the EPA noting that investment in care would make Ireland more resilient to climate impacts<sup>51</sup>. Care services and employment when properly resourced, funded and valued could fulfil the triple roles of improving employment and gender equality and helping us meet climate change targets<sup>52</sup>. Care work should be recognised as the green work that it is, including wages and working conditions that value its essential role in our present and future society appropriately.

#### Key actions/indicators

- Reform macro-economic state policy frameworks, for example, the National Development Plan for greater focus to encourage and invest in economic diversification towards non emissions-intensive activities, including social infrastructure such as care and support

## Retrofit for Resilience Prioritising Communities facing Energy Poverty

One in three households in Ireland are classified as living in energy poverty<sup>53</sup>, and those most impacted by energy poverty are female lone parents renting private accommodation<sup>54</sup>. Women are at greater risk of energy poverty due to their lower average incomes, and lone parents, older women living alone, disabled people and carers are particularly at risk. Travellers, who spend five to six times the national average on energy<sup>55</sup>, are not eligible for retrofitting schemes if they live in a caravan, mobile home or trailer. The cost of fossil fuel energy is both expensive and bad for our environment.

Cost is still a barrier to retrofitting, with one in three households finding the process too expensive<sup>56</sup>. Fully funded SEAI retrofits are plagued by waiting lists, with figures in 2024 showing an eight to ten month waiting period for home assessment alone<sup>57</sup> – this does not include the time required to carry out works on the house. More investment is needed in retrofitting to make it more immediate and accessible for those who need it most.

#### Key actions/indicators

- Target and increase investment in retrofitting schemes and measures, prioritising marginalised groups and those affected by energy poverty including women; disabled people; migrants; people seeking refuge and international protection; Travellers and Roma; and lone parents
- Develop a measurement for energy poverty that is not solely expenditure-based, and move beyond the household as the sole unit of measurement for energy poverty
- Adopt targeted measures to ensure Travellers and Roma living in all types of accommodation can avail of energy upgrades and SEAI grants
- Develop a scheme similar to the Building Energy Rating Certificate (BER) for trailers, caravans and mobile homes
- Develop research capacity to analyse the gendered effects of energy poverty
- Expand and increase of Fuel Allowance (see Social Protection section)

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<sup>51</sup> As recommended by the Environmental Protection Agency: [Ireland's Climate Change Assessment Synthesis Report](#).

<sup>52</sup> Dukelow, F., Forde, C. and Busteed, E. (2024).

<sup>53</sup> ESRI (2022) [Energy Poverty and Deprivation in Ireland](#).

<sup>54</sup> Dukelow, F., Forde, C. and Busteed, E. (2024).

<sup>55</sup> Ibid.

<sup>56</sup> Savills Ireland. (2023, September 20). [One in three homeowners cannot afford to make their properties more energy efficient](#).

<sup>57</sup> Oireachtas. (2024, May 14). *Written answers: [Departmental Schemes](#) (Question No. 128)*.

## Make Public Transport Safe, Accessible, and Frequent for Everyone

We need an inclusive approach to transport infrastructure, ensuring that all needs are catered for – those of women, disabled people, people in rural Ireland and all members of marginalised communities – where everyone feels comfortable and safe going to and from work, schools, college, creches, shops and leisure. Safety concerns can stop women and marginalised communities like LGBTQI+ people and people of colour from using public transport – 55% of women have said that they would not use public transport at night.<sup>58</sup> More public transport is necessary, especially for rural Ireland, but we cannot reproduce infrastructure which is inaccessible for disabled people and incompatible with caring journeys. We must pursue an expansive and reliable public transport system which is accessible for all kinds of people and all kinds of journeys. This would alleviate the cost of car ownership for poorer households and help reduce our carbon emissions.

### Key actions/indicators

- Prioritise and increase investment in public and active travel infrastructure, focusing on rural transport and making transport safer and more accessible
- Reduce the cost of public transport for people who struggle to access it:
  - Introduce a new integrated transport scheme for disabled people that meets the needs of the individual, and ensure all new transport spending incorporates the needs of disabled people
  - Expansion of the Free Travel Scheme
  - Continue extending the Young Adult Travel Card in Budget 2025, and implement zero cost travel for children and teenagers
  - Keep the School Transport Scheme free for the 2024/2025 academic year

## Ireland for All

### Resource and strengthen women’s organisations across communities to promote inclusivity, solidarity and diversity

The women’s sector in Ireland has been the key driver in highlighting and addressing issues of isolation, economic dependency, poverty, violence, and powerlessness among women in all their diversity. However, ongoing underinvestment in the community development sector and local women’s organisations has exacerbated social exclusion across the island. Jobs in the community sector, predominantly held by women, continue to be insecure and low paid. This has enormously impacted the capacity of women’s groups for collective action, political analysis and for grassroots community development to address persistent inequalities in local communities and support women’s representation, participation and inclusion. Funding for women’s community organisations, and for community funding programmes like SICAP, remains well below 2008 levels – even before cost increases since then.<sup>59, 60</sup>

Women in rural communities experience additional barriers to participation, due to underinvestment in social infrastructure.<sup>61</sup> The community sector is particularly important in fostering inclusion and celebrating diversity within communities right across the island. With the growth of violence and hate in recent months directed at marginalised groups such as migrants and international protection

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<sup>58</sup> Transport Infrastructure Ireland (2020) [Travelling in a Woman’s Shoes](#).

<sup>59</sup> The Wheel (2023) [Family Resource Centre National Forum call for 3.34 million in core funding](#).

<sup>60</sup> Irish Local Development Work (2023) [Budget 2023: Protecting Communities & Promoting Social Inclusion](#).

<sup>61</sup> National Women’s Council (2021) [Paper on Women in Rural Communities](#).



applicants in particular, the community sector is more essential than ever in building inclusive communities that welcome and support everyone. The community sector (in all its diversity) cannot effectively do this work without adequate funding.

#### Key actions/indicators

- Increase funding, including multi-annual state funding, to properly resource women's community organisations, and the broader community sector
- Ensure funding for services and programmes provides meaningful employment with decent terms and conditions for workers, including:
  - Pay scales commensurate and in alignment with public sector peers
  - Pension provision, paid sick leave, and paid maternity leave

## Fully realise the UNCRPD to ensure active equal participation of all disabled people

In Ireland, 22% of the population has a disability,<sup>62</sup> yet significant barriers persist in accessing necessary services and supports, particularly for disabled women who face compounded challenges due to gender inequality. Despite Ireland ratifying the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in 2018, progress in addressing these barriers has been slow. Recent statistics highlight the stark realities, such as only 34% of disabled people being in employment<sup>63</sup>, and those unable to work due to long-standing illness experiencing the highest levels of poverty and deprivation. The government's now-defunct Green Paper on social protection Disability Reform, while encouraging discussion, lacked engagement with disabled persons' organizations (DPOs) and civil society and did not fully address Ireland's obligations under the UNCRPD. This siloed approach, focusing primarily on social protection and narrowly on labour activation for disabled people was hugely problematic – it is imperative that the next National Disability Strategy considers the barriers faced by disabled people in its broadest sense.

The next National Disability Strategy (integrated with the next NSWG) must address the systemic issues that hinder disabled women's participation in society. A whole-of-government approach is needed, one that is underpinned by meaningful engagement with DPOs, and civil society and integrates cross-departmental efforts to remove barriers in various sectors, such as employment, housing, healthcare, and education. Only through co-creation and the embedding of UNCRPD obligations into policy reform can Ireland make meaningful progress in advancing the rights of disabled people.

## Progress legislation and policies to tackle discrimination, hate and racism

NWC has witnessed an alarming rise in aggression and racist attitudes in recent years, fuelled by far-right actors and the spread of disinformation. Reports from the Institute of Strategic Dialogue<sup>64</sup> and the EU highlight the growing influence of the far right on social media in Ireland. A small core of ideologically committed actors consistently incites hatred, spreading fear and division, as evidenced by the work of the Hope and Courage Collective. They have documented increased violent rhetoric, both online and offline, targeting minority communities, including asylum seekers, migrants, LGBTQI+

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<sup>62</sup> Central Statistics Office. (2023, August 31). [Press statement: Census 2022 results - Profile 4, disability, health and carers.](#)

<sup>63</sup> Central Statistics Office. (2023). [Census 2022 profile 4: Disability, health and carers - Disability and everyday living.](#)

<sup>64</sup> Institute for Strategic Dialogue. (2023). [Uisce faoi thalamh: Summary report.](#)

individuals, and others. This rise in hostility is leading to greater division within communities, not only in Ireland but across the EU.

It is critical to differentiate between legitimate protest—a fundamental right in any democracy—and actions deliberately designed to incite hatred and fuel division. Acts of incitement to hatred, such as attacks on libraries, bookshops, and individuals from minority communities, must not be tolerated. We know that safety is built in communities where all people, regardless of background, have access to decent work, secure housing, good schools, and healthcare. Addressing challenges through social supports, skilled youth and community workers, rather than through fear and scapegoating, is essential. Both the government and social media companies have a role to play in stemming this rise in hatred by expediting hate crime and hate speech laws and enforcing standards online.

#### **Key actions/indicators**

- Government and social media companies must stem the rise of hatred, including by expediting overdue hate crime and hate speech laws, and by enforcing standards online.

## **Develop all-island strategies to advance women’s rights and gender equality**

Women have contributed enormously to peacebuilding, reconciliation and all island development. Through community development approaches, we have brought a bottom-up approach to sustainable peacebuilding, building cross-community and cross-border relations and partnerships. Despite the important role played by women, we have been historically underrepresented in decision making fora. The All Island Women’s Forum, led by NWC, has contributed to a greater understanding of shared island challenges, and opportunities for progressive and peaceful social change through a gendered lens. The Forum provides a critical space for developing all island approaches to women’s equality - building sustainable North-South links, a space for marginalised communities, and an enhanced understanding and intercommunity collaboration. The Forum can be utilised as a mechanism for developing harmonised policy initiatives North and South and developing all island policy solutions to advance women’s rights and gender equality.

In collaboration with Women’s Aid Federation Northern Ireland, NWC undertook a North/South initiative addressing intimate partner violence across the island of Ireland. The project seeking to enhance cross-border cooperation and develop an all-island approach, developed a comprehensive dialogue report (due to be published November 2024) outlining key recommendations and strategies to more effectively tackling intimate partner violence. This is an innovative and unique project across the island and for the first time is developing ways forward to tackle violence against women from an all- island perspective.

#### **Key actions/indicators**

- Increase core funding to the National Women’s Council to advance full equality for women on an All-Island basis
- Resource and implement recommendations of the report of the All Island to Tackle VAW Group
- Ringfence specific funding in future Shared Island programmes in the form of a ‘Women’s Fund’ for women’s organisations working in the areas of peacebuilding, reconciliation, and North/South-cooperation on the island

## Socio-economic equality

As outlined previously, NWC is of the view that it is not appropriate to rank priority areas relating to socio economic equality. There was a strong consensus among NWC’s membership that all of these issues are interconnected, are of equal importance, and require the same level of State response. Through consultation with our members, a strong focus emerged on women's caring responsibilities in the context of socio-economic equality. Women disproportionately bear the responsibility of paid and unpaid care work, and there is a pressing need for more robust, and targeted legislative and policy solutions in this area. By addressing these issues, we can enable women to participate freely and equally in all aspects of society. Childcare was central to our member’s discussion on care, as accessible and affordable childcare remains one of the biggest barriers to women’s full participation in society. Without it, women face significant obstacles in accessing education, employment, and engaging in community and political life. Reform of our state structures is essential to fostering a more egalitarian society that fully acknowledges and supports caring responsibilities, particularly in the areas of social protection and employment. To ensure the advancement of women’s socio-economic equality, NWC recommends a focus on the following areas for inclusion in the development of the next National Strategy for Women and Girls.

### Increase/benchmark social protection rates to ensure adequate income for all

Our social protection systems were built for a different era and based on a largely male breadwinner understanding of both the labour market and social protection systems – resulting in significant gender gaps in income and access to state support.<sup>65</sup> Women bore the brunt of decisions to cut social protection payments during the austerity years because women are more likely than men to be lone parents, to be outside the paid labour market because of unpaid caring responsibilities, and to benefit more from child-related supports.<sup>66</sup> The gendered structural inequalities in our labour and social protection systems are compounded further by the cost-of-living crisis, which continue to impact women disproportionately hard. Since January 2020, inflation has risen by a total of 20% – costs now are one-fifth higher than they were before the pandemic. Yet increases in social protection rates have not kept pace. Recent budgets have relied on once-off expenditure to get people through the cost-of-living crisis – however, an over-reliance on this form of non-core spending will not protect women from poverty, or tackle income and wealth inequality in the long-term. Payment increases have not been sufficient to offset increases in cost of living and are still going up. We need a social protection system that can support all women to achieve a minimum essential standard of living, now and into the future.

#### Key actions/indicators

- Establish the Minimum Essential Standard of Living as the benchmark for social protection payments by 2026 to ensure an adequate income for all
- Reform social protection payments to better support the most marginalised groups in society, including through the adjustment of income disregards, and eligibility thresholds

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<sup>65</sup> National Economic and Social Council (2022) *Ireland’s Social Welfare System: Gender, Family and Class*.

<sup>66</sup> Doorley, K. at al (2018) [The Gender impact of Irish budgetary policy 2008-2018](#).

## Reform the social protection system to treat women as individuals, not dependents

Our social protection system continues to be rooted in a ‘male breadwinner’ approach to paid and unpaid work. This is evidenced by the ‘qualified adult’ system – where payments to two-parent families comprise a payment for the main claimant and a Qualified Adult (QA) payment to additional adults in the household. The available data shows that 90% of QAs are women.<sup>67</sup> This system creates a relationship of dependency, as QAs do not receive an income in their own right and are excluded from many active labour market programmes that require a core social protection payment.

The Roadmap for Social Inclusion has a commitment to examine individualisation, and the Citizens’ Assembly on Gender Equality also recommended it. The Covid-19 income supports have demonstrated that it is possible to administer payments in an individualised way. We now have an opportunity to abolish the system of dependency and implement an individualised approach, based on equality with individual entitlements for all women.

### Key actions/indicators

- Adopt a fully individualised social protection system so that women are treated as individuals, rather than dependents of their partner
- Ensure Qualified Adults can access a range of active labour market programmes
- Resource a national survey to ascertain skills, education, health, care/support and employment experience of Qualified Adults to address data gaps

## Introduce a Universal State Pension to guarantee a decent income for older women

As women are more likely to be in low paid, part-time jobs on precarious contracts, and are more likely to take time out of paid employment because of caring and supporting responsibilities, it makes it difficult to collect sufficient PRSI contributions, and they are less likely to be eligible for the full State Pension (Contributory). They are less likely to be covered by occupational or private pension schemes, and more reliant upon the means-tested State Pension (Non-Contributory).<sup>68</sup> Older women have also faced structural barriers like the Marriage Bar and exclusion from new schemes to recognise care and support – and these issues should be rectified through a retrospective scheme. Moving to a Universal State Pension, guaranteeing adequate income for all at pension age, is the best way to support women and those who encounter barriers to the labour market, including disabled people, carers and supporters, lone parents, Travellers and Roma.

### Key actions/indicators

- Deliver a Universal State Pension system for all
- Benchmark State Pension to 34% of average earnings to maintain the relative value of the State pension compared to earnings growth and price inflation.
- In the interim, the State should provide for retrospective contributions, including for those caring more than 20 years to ensure a full State Pension (Contributory); to allow access for women born before 01/09/1946 to the Homemaker’s and Home Caring Periods schemes; and

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<sup>67</sup> NES (2021) Background Paper 151/4, 2021 – Ireland’s Social Welfare System: Gender, Family and Class.

<sup>68</sup> National Women’s Council of Ireland (2021) [Submission to the Commission on Pensions](#).

a once-off, ring-fenced retrospective scheme in acknowledgement of the injustices of the marriage bar

## Close the gender pay gap, implement a living wage, legislate for collective bargaining rights

The current employment system does not properly recognise and value care responsibilities, which alienates many women from the labour market and limits their participation at varying levels. Lone parents, migrants and ethnic minority women, Traveller and Roma women, disabled women and young women already all experience heightened barriers to labour market participation. It is imperative that the State create the conditions in which women can access decent, secure work that is also compatible with care responsibilities. This includes enhanced flexible working and family leave entitlements. Action must also be taken to improve pay, conditions and collective bargaining across the labour market, particularly in sectors with a high level of female employment.

For many women paid work is no guarantee of income adequacy as women predominate in sectors characterised by low paid and precarious work. 6 out of 10 low paid workers are women<sup>69</sup> and the gender pay gap remains at almost 10%, with this rate increasing to as high as 50% in some sectors. This has serious implications for a woman's lifetime earnings, her life and career decisions, and her ability to live in older years with a decent income. The Irish Government must support women to access decent work opportunities, and all labour activation policies must be gender and equality-proofed.

### Key actions/indicators

- Legislate for and enhance collective bargaining across the labour market, particularly in industries with a high level of female employment, in order to raise wages and improve working conditions<sup>70</sup>
- Expand the Gender Pay Gap Information Act 2021 to include organisations with more than 25 employees and set up a centralised database of this information
- Pursue active policies that enhance pay and conditions for women in paid employment, in particular across the care and community sectors (where women are disproportionately represented, and work is insecure and low paid)

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<sup>69</sup> 6 out of 10 low paid workers are women with young people and lone parents more likely to be low paid or National Minimum Wage (NMW) workers. According to the CSO, in 2021 median weekly earnings for males were €711.87 compared with €570.22 for females, a differential of 19%. Furthermore, almost half of women earn less than €20,000 a year.

<sup>70</sup> In 2024 the Irish government will transpose the EU Directive on Adequate Minimum Wages. This directive requires Ireland to implement a national action plan on collective bargaining coverage. Currently, collective bargaining coverage is relatively low in the Irish labour market compared to other EU countries. It is critical for women that the State takes the appropriate measures through the transposition of this Directive to enhance collective bargaining rights. The Irish Human Rights and Equality Commission's in its July 2023 policy statement on care recommends that the State take immediate action to address the ongoing absence of a statutory right to collective bargaining, and adopt measures to increase trade union membership across the care sector. It is of fundamental importance that the Irish Government enhance collective bargaining across the labour market, particularly in industries with a high level of female employment, in order to raise wages and improve working conditions.

## Deliver a new public system of accessible, affordable, high-quality childcare

Lack of accessible and affordable childcare is the single biggest barrier to women's participation in all areas of society, including the workplace, but also in education, the arts, sports and the political sphere.<sup>71</sup> Notwithstanding significant investment in recent years in early childhood education and care our current system is not fit for purpose. Currently, Ireland has the highest level of private provision of Early Childhood Education and Care (ECEC) of any OECD country.<sup>72</sup> A fully state-subsidised, profit-driven model, is not sustainable as a long-term vision for the sector and will never meet the needs of a changing society.

ECEC costs for parents are among the highest in the EU, leaving many families struggling financially or being unable to cover the costs of childcare. High costs of childcare across the country are particularly compounded in certain areas, as there is up to a 60% variation in service fees between the most and least expensive counties.<sup>73</sup> For many families they are unable to access the childcare they need due to the limited number of childcare spaces available (particularly for under 2s) because it is simply not cost effective for private providers to provide this care due to ratio levels. Rural and disadvantaged urban areas are also underserved by private providers where there it is less incentivised to operate. It is particularly difficult for parents of children with extra needs to access care, in addition to single-parent families (mainly led by women), families living with addiction, and Traveller and Roma women. Staff recruitment and retention pose a critical challenge affecting service provision, sustainability and quality, with high staff turnover driven by low pay and poor conditions.

Together for Public is a new alliance of over 30 organisations, led by NWC is calling for a Public System of Early Childhood Education and Care to ensure accessible, affordable, high quality care for every child, from whenever families need it. Countries with public systems have demonstrated greater affordability, accessibility, and quality in their services, with better pay, security and conditions for workers.<sup>74</sup> A fully public-funded and public-delivered system of Early Childhood Education and Care is an absolute necessity to advance gender equality and build a care sector that works for all children, women, families, educators and providers.

### Key actions/indicators

- Deliver a new public system of not for profit, accessible, affordable, high-quality childcare
- Legislate to guarantee childcare for every child, in every community, across Ireland, ensuring access from the age that families need it
- Ensure decent wages and working conditions for all educators
- Expansion of the community sector and rollout of public-delivered ECEC services (starting with those areas underserved via pilot programme) alongside private provision

## Extend paid maternity, paternity, other family leave, and enhance flexible working

International practice shows that where a public system of early childhood education and care operates in tandem with paid systems of parental leave (so that there are no gaps in childcare) the

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<sup>71</sup> Women are still the main caregivers for children in Ireland. In 2022, 244,823 women listed themselves as looking after the family home in the Census, compared to 27,495 men. And 86% of lone parents in Ireland are women.

<sup>72</sup> Oireachtas Library & Research Service. (2020). *Public provision of early childhood education: An overview of the international evidence.*

<sup>73</sup> Pobal. (n.d.). *Childcare fees.*

<sup>74</sup> Heery, E. (2020) *Public Provision of Early Childhood Education, an overview of the international evidence.*

impact for gender equality is significant. In contrast, in Ireland, it is women who end up making the difficult decisions – to leave work or to go part-time, to drop out of education, to curtail their passions in the arts or sports. This is reinforced by the gender pay gap, whereby in heterosexual couples, women often earn less than men. In turn, women’s decisions to leave work or take part-time roles reinforces the gender pay gap.

Payments for family leave in Ireland are much lower than EU norms and there is a larger gap between the end of paid leave and the start of early years education services.<sup>75</sup> Payments in most OECD countries offer at least 50% of average earnings, with many offering 100%, while in Ireland less than a third of average earnings are replaced.<sup>76</sup> Family leave payments must be increased and linked to earnings to keep up with inflation but also to begin the process of bringing payments more in line with EU norms. A new system of public childcare must be combined with better paid and longer maternity, paternity, and other family leave so that parents have real choices when it comes to caring for their child. Family leave must be flexible enough for lone parents, or other carers and guardians, to be able to avail of the full leave entitlement too. This must also be complemented with improved flexible working conditions to support parents work life balance.

### **Key actions/indicators**

- Increase Maternity, Adoptive, Paternity and Parent’s Benefit payments to an adequate benchmarked level, and examine the implementation of a percentage-of-earnings model of leave/benefit
- Convert existing unpaid Parental Leave to paid leave
- Ensure lone parents have access to the same leave entitlements as couples
- Progress and fully implement legislation to provide for deferral of maternity leave for new mothers/birthing parents during their care/treatment for serious illness

## **Physical and mental health**

NWC reiterates that ranking priority areas related to the physical and mental health of women and girls is not appropriate, as all these issues are interconnected and equally important. A holistic approach to women’s healthcare is needed, addressing physical, mental, and emotional well-being in parallel, while taking a life-course perspective that considers the changing needs of women across all stages of life. This includes the specific needs of adolescent girls, adult women, and older women to ensure improved health outcomes and quality of life for all.

It is equally important to recognise and address the structural inequalities that prevent marginalised women, such as disabled, ethnic minority, and migrant women, from accessing healthcare that appropriately meets their needs. Applying an intersectional lens to healthcare is essential to ensure that services are designed to meet the diverse needs of all women. Such an approach can identify and address the specific challenges that marginalised women face, inform the design of services and care delivery that are equitable and effective for all women, and improve health equity. Empowering women with autonomy and influence over their healthcare decisions is key to achieving equitable health outcomes. Such an approach fosters a more responsive healthcare system that addresses women’s unique needs and experiences, promoting gender equality and ensuring that women’s voices are integral to health policy and service delivery. Providing the necessary

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<sup>75</sup> Oireachtas Library & Research Services (2021) [L&RS Bill Digest: Family Law Bill 2021](#).

<sup>76</sup> OECD (2021) OECD Family Database: F2.1. [Parental Leave Systems](#).

resources—such as education and access to information, is vital for enabling women to achieve their autonomy in healthcare, ensuring they can advocate for themselves and make informed choices.

Despite significant developments in women’s health (as outlined above under question X), there is a need to ensure continued investment in women’s health research, data collection and service reform to appropriately meet the needs of all women and girls. A comprehensive approach to women’s health must also be adopted through the development of the strategy, ensuring that critical areas (which have not been identified in the survey), including reproductive and maternal health, are addressed. Healthcare must also shift from a crisis-driven approach to one that prioritises prevention and early intervention to ensure long-term, sustainable outcomes. To ensure the advancement of women’s health, NWC recommends a focus on the following areas for inclusion in the development of the next National Strategy for Women and Girls.

## Guarantee universal healthcare for all women and girls

A universal health care system is essential in ensuring all women and girls can access the care they need, when they need it, without incurring undue financial hardship. The provision of universal healthcare is a feminist issue due to the structural inequalities that women face in accessing healthcare that appropriately meets their needs. Marginalised women are more likely to face lifetime health problems and die younger because of systemic health inequalities. They are particularly reliant on the public healthcare system, face significant barriers to timely, high-quality care in a privatised system, widening existing health inequalities.<sup>77</sup> Sláintecare, our national framework for moving from a two-tier system to universal health and social care, has the potential to improve the health outcomes of all women by mapping population profiles and prioritising the provision of high-quality services and supports.

### Key actions/indicators

- Commit at least 10% of the annual health budget’s allocation to the delivery and expansion of universal health care
- Develop patient-centred care models to ensure better primary and community care
- Expand GP visit cards to children 8-10 years and older, and to households where the median household income is €55,149 or less
- Extend the chronic disease management programme to women aged 18+ years who are diagnosed with gestational diabetes or pre-eclampsia, among other chronic conditions

## Investment in women’s health services

NWC has supported the Department of Health for several years to develop the first ever Women’s Health Action Plan (2023-2024) and the subsequent successor Plan (2024-2025). While positive steps have been taken, such as in relation to free contraception, and fertility treatments, more is needed to bridge the stark health inequalities experienced by marginalised women. This includes the health needs of migrant women, Traveller and Roma women, LGBTIQ+ individuals, disabled women, and women who have experienced homelessness, addiction, and gender-based violence. The principles of the new Women’s Health Action Plan are to “Listen, Invest and Deliver”. In doing so, the Department must adopt a targeted approach to ensure the experiences and perspectives of all women are included. Furthermore, the Department should consider how investment in women’s health can tackle the social determinants of health, including how policies relating to housing,

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<sup>77</sup> NWC (2019) [Evidence Base for the Development of the Women’s Health Action Plan](#).



climate justice, poverty, and education are affecting women. Continued advancements are also needed in the areas of reproductive health (menopause, maternal, menstrual, and fertility treatment), as well as sexual health, mental health and chronic diseases.

#### **Key actions/indicators**

- Allocate secure multi-annual funding to women's health services to support the implementation and further development of the Women's Health Action Plan
- Address health inequalities experienced by marginalised women by developing targeted, and cultural humility practices in health services, embedded with equality data collection
- Continue to roll out the free contraception scheme to people of all ages (beyond the current 17-35 years cohort)
- Implement the recommendations of the O'Shea abortion review by ensuring no woman or pregnant person must travel for essential reproductive health care
- Expand publicly funded fertility services with the establishment of a Public Assisted Human Reproductive Treatment Centre
- Support referral pathways to Specialist Menopause Clinics and increase their capacity

### **Deliver gender sensitive mental health services that meet all women and girl's needs**

The World Health Organisation considers gender to be a critical determinant of mental health. Research demonstrates that many of the risk factors for experiencing mental health difficulties, including – poverty, violence, low socioeconomic status, insecure employment, and responsibility for care of others – disproportionately impact women.<sup>78</sup> Gender has also been shown to affect how mental distress presents, in addition to support needs, and access to and experiences of mental health care. This is particularly true for marginalised women – such as Traveller and Roma women – who face additional structural barriers including racism and discrimination. Despite the mental health crisis worsening in Ireland in recent years, Government has not come close to meeting the Sláintecare target for mental health funding to be 10% of the overall health expenditure. Significant investment is needed to resource a gender-sensitive implementation of Sharing the Vision to reform our mental health system and improve mental health outcomes for all women and girls living in Ireland.

#### **Key actions/indicators**

- A commitment to a long-term funding strategy which brings the mental health allocation to +10% of the overall health budget by 2030
- Reinstatement of a national leadership role for mental health in the HSE to ensure oversight and leadership in service improvements including the delivery of gender sensitive mental health services
- Deliver on gender-sensitive mental health services through full implementation of Sharing the Vision, ensuring services and staff are resourced through training, education, policies and systems to promote gender sensitivity, complemented by cultural humility and trauma informed practices

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<sup>78</sup> NWC (2023) *Gender-sensitive Mental Health*.

## Fasttrack the establishment of Ireland’s first Mother and Baby Unit

One in five women will experience perinatal mental health difficulties during pregnancy or up to one year after giving birth. While a very small proportion will experience severe or complex mental health difficulties (approx. 2-4 per 1,000), with an even smaller number requiring hospital admission<sup>79</sup>, there is no dedicated Mother and Baby Unit in Ireland. The HSE’s Specialist Perinatal Mental Health Model of Care (2017), includes a clear commitment to the establishment of an MBU<sup>80</sup>, however this core component of the model has failed to be delivered. Currently, women who need in-patient care following childbirth are separated from their babies. MBUs are critical in keeping mothers and their babies together, delivering mental health care to women, and nurturing and supporting the mother-infant relationship.

### Key actions/indicators

- Establishment of Ireland’s first Mother & Baby Unit at the previously approved site at St. Vincent’s University Hospital, Dublin. to provide in-patient care and support for mothers experiencing very severe and complex perinatal mental health difficulties
- This should be complemented with increased investment in the development and implementation of an updated Specialist Perinatal Mental Health Model of Care to ensure strengthening and resourcing of all specialist perinatal mental health services, as well as supports at primary care level and in the community, recognising the increasing demand and pressure on existing services
- Research and data on the experiences of ethnic minority and migrant women to improve perinatal mental health services for all women, underpinned by practices of cultural humility, gender sensitivity and trauma informed care

## Ensure direct access to safe, local, legal abortion for all who need it

At least 1,117 women have travelled from Ireland to Britain for an abortion since 2018.<sup>81</sup> This is a stark figure which represents the ongoing barriers to timely, equitable, and accessible abortion services in Ireland. Marie O’Shea’s 2023 review of Ireland’s abortion provision noted the significant barriers women face when trying to access abortion care. While some progress has been made to improve the geographical coverage – with 17 out of 19 maternity hospitals now providing care – issues like criminalisation and the mandatory 3-day wait impinge upon women’s right to reproductive health care. The Independent Review on abortion provides us with a significant opportunity, rooted in the lived experiences of women, pregnant people and service providers to tackle the legal and operational barriers to access. The State must progress the development of abortion policy, in line with these lived experiences, evolving international guidance (including recent guidance from the WHO) and best clinical practice on reproductive rights and abortion care. NWC is calling for the urgent implementation of the O’Shea recommendations as well as expanding and enhancing abortion care more broadly for all who need it.

### Key actions/indicators

- Full decriminalisation of abortion in line with World Health Organisation (WHO) guidance to remove the chilling effect on healthcare providers, ensuring that they can use their clinical judgment to care for patients without fear of prosecution
- Remove the mandatory three day wait period to ensure timely access to abortion care

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<sup>79</sup> Health Service Executive. (2017). *Specialist perinatal mental health services model of care.*

<sup>80</sup> Ibid.

<sup>81</sup> Office for National Statistics. (2023).

- Review the 12-weeks gestational limit and enable abortion on request up to viability to ensure that no woman or pregnant person is forced to travel abroad for essential reproductive healthcare
- Remove the 28-day limit to ensure all women with a diagnosis of severe or fatal foetal anomaly are guaranteed compassionate care in their own country
- Broaden coverage to ensure access to abortion care in all communities nationwide through primary care and maternity hospital settings

## Extend the Free Contraception Scheme to all ages

Research conducted by Dublin Well Woman in 2020 found that many women face barriers when trying to access affordable and appropriate forms of contraception.<sup>82</sup> While the financial burden has been significantly reduced since the introduction of a Free Contraception Scheme in 2022, NWC continues to call for this Scheme to be available to women of all ages. Universal access to contraception is fundamental to reproductive health and critical for achieving gender equality. In the NHS (UK), free contraception is available to all, including adolescents. To promote reproductive rights, women must have real contraceptive choice and access to the most effective forms of contraception. This is particularly pertinent in the context of the rising costs of living and ensuring marginalised groups of women benefit from targeted initiatives.

The expansion of the Scheme would also ensure that women and people identifying as transgender or non-binary would have access to a service which covers the cost of consultations with GPs, family planning, student health and primary care centres, and prescriptions for a wide range of contraceptive options. The Scheme has been a success to date with almost 2,400 GPs and 2,050 pharmacies taking part, and more than 189,000 women accessing free contraceptive services in 2023.<sup>83</sup>

### Key actions/indicators

- Continue to roll out the free contraception scheme to people all ages (beyond the current age cohort of 17-35 years)

## Fully resource and integrate relationships and sexuality education within SPHE

A new junior cycle SPHE curriculum commenced in schools in September 2023, followed by the Senior Cycle curriculum one year later. The primary school consultation concluded June 2024 and is expected to be implemented in 2025/26. The SPHE curricula has the potential to transform young people's perceptions of gender and gender stereotypes and prevent gender-based violence. Research shows that Relationships and Sexuality Education (RSE) leads to healthier relationships, improves self-esteem, and is crucial to preventing gender-based violence. Our national strategy on violence against women strongly recommends a reformed school curricula which can focus on issues like gender stereotypes, intimate partner abuse, and the harms of pornography.

In order to be as effective as possible, SPHE should be mandatory. It is critical that all schools are supported to deliver the junior and senior SPHE cycles in full, that the curriculum is fully inclusive, and culturally sensitive, taking account of the particular needs of minority and marginalised groups.

<sup>82</sup> Well Woman Centre. (2020). [Contraceptive access and provision in Dublin: A report.](#)

<sup>83</sup> Government of Ireland. (2023, October 16). [Minister for health announces that free contraception will be extended to women aged 32-35 from 1 July 2024.](#)

Teachers must also receive ongoing training, and a whole school approach developed (involving parents, students and wider community) to embed the values of gender equality in the structures and ethos of the school.

#### **Key actions/indicators**

- Provide all teachers with high quality training, resources and tools, including on gender stereotypes, gender equality, and the various forms of violence against women
- Increase the number of graduate programmes in SPHE and provide Continuous Professional Development (CPD) support for teachers with previous SPHE training experiences
- Establish a framework for an evidence based continuous review and evaluation of the SPHE curricula which incorporates a gender lens, in addition to robust mechanism for students, parents and the wider community to provide feedback on the new curricula's implementation

## **Women's leadership and participation**

Ensuring that the voices of women are included in decision-making forums and that their contribution is supported and resourced is key to tackling gender inequalities. Despite the recent introduction of 40% gender quotas for general elections, significant barriers remain in ensuring equal representation of women in politics. Gender-based abuse of female politicians must be tackled, family-friendly policies adopted, and women must be put forward for seats that are actually winnable. We must also see gender quotas extended to local elections. Local government, with its close connection to women's lived experiences, has the potential to boost women's participation in decision-making and better represent their interests. Given that local political experience is a crucial pathway to national office for women, targeted measures are needed to support their engagement in local government. Legislation and practical measures must also be introduced to ensure the inclusion of marginalised women, such as Traveller and Roma women, working-class women, disabled women, migrant women, LGBTQ+ women, and those in rural areas. These groups often face the greatest impact from policy decisions and encounter additional barriers to full participation in public and political life.

To address the persistent under-representation of women in STEM and on corporate boards, policy measures must focus on eliminating structural barriers, implementing gender quotas, and fostering inclusive recruitment and retention practices. Increasing women's participation in these sectors is critical to achieving gender equality, as it ensures equitable access to leadership, drives innovation, and promotes balanced decision-making. Such representation is essential for creating a more inclusive society, where women have equal opportunities to influence and shape the future of key industries.

The women's sector in Ireland has been crucial in addressing issues like isolation, economic dependency, and violence among diverse groups of women. However, underinvestment in community development and local women's organisations has worsened social exclusion. Jobs in this sector, largely held by women, remain insecure and low-paid, hindering collective action and grassroots initiatives aimed at tackling inequalities and promoting women's representation. As violence against marginalised groups increases, the community sector's role in fostering inclusion is more critical than ever, yet it cannot fulfill this function without adequate funding. To ensure the advancement of women's visibility, participation and leadership, NWC recommends a focus on the following areas for inclusion in the development of the next National Strategy for Women and Girls.

## Legislate for Gender Quotas in Local Elections

Despite being over half of Ireland's population, women remain underrepresented in Irish politics, particularly at the local level, where only 26% of councillors are women.<sup>84</sup> Women face additional barriers to entering and retaining a career in local politics. Gender quotas have proven effective at the national level and should be implemented locally to address this imbalance. Research shows that policy outcomes improve when women are adequately represented. It is crucial to take meaningful action to introduce legislative gender quotas in local elections, to amplify women's voices and ensure equitable representation in local government.

## Mandate 40% Quota for Women on Corporate Boards

National Women's Council calls on Government to support Deputy Higgins' Private Members' Bill on Board Gender Quotas. The NWC's 'Balance the Odds' campaign initiated in 2022, is essential for advancing women's equality by increasing their representation on corporate boards. The proposed Private Members' Bill mandates a 33% quota for women on boards, increasing to 40% after three years, with potential sanctions for companies that fail to meet these requirements.

In November 2022, the EU approved the "Women on Boards" Directive, requiring that by 2026, at least 40% of the underrepresented gender must be represented on non-executive boards of listed companies, or 33% across all directors. This legislation has real potential to improve women's representation on boards and subsequent leadership in the corporate world.

## Boost women's Representation in STEM

Recent research shows that women occupy just 25% of STEM (Science, Technology, Engineering, and Mathematics) jobs in Ireland. Male students are twice as likely to be encouraged to pursue tech studies compared to their female peers. Addressing this imbalance is crucial, as women's unique insights can drive more innovative solutions in STEM fields and ensure that gender-specific issues are properly addressed. We encourage the government to invest and support learning environments that encourage participation from all students, addressing any unconscious biases or stereotypes that may discourage girls from pursuing STEM.

## Put women at the heart of peace building and reconciliation

Conflicts often disproportionately affect women, through sexual violence, displacement, and loss of livelihoods. It is crucial that we intensify our efforts in peacebuilding and reconciliation throughout the island. Women often play key roles in their communities and can facilitate reconciliation and trust-building, which are critical for sustaining peace. The NWC "All-Island Women's Forum" aims to address underrepresentation of women and further develop women's role in peacebuilding and civic society, ensuring reconciliation remains central to our future. We recommend funding civil society organisations to strengthen connections North and South.

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<sup>84</sup> O'Connor, J. (2023, October 16). [This political battle will play out in the shadows. Irish Examiner.](#)

### Key actions/indicators

- Reform remuneration for Councillors by allowing childcare/care and support costs as an expenditure category for Councillors
- Introduce maternity leave provision for members of the Oireachtas
- Increase funding for development of local and regional Women's Caucuses
- Funding civil society organisations to strengthen connections North and South
- Invest and support learning environments that encourage participation of women and girls in STEM (and other sectors which are typically underrepresented by women), addressing gender specific barriers to access and retention
- Increase core funding to the National Women's Council to advance full equality for women on an All-Island basis
- Ringfence specific funding in future Shared Island programmes in the form of a 'Women's Fund' for women's organisations working in the areas of peacebuilding, reconciliation, and North/South-cooperation on the island

## Gender equality in law and policy

Similarly, with other priority areas identified in the survey, there was a strong consensus among NWC's membership that it is not possible to rank the priority issues relating to gender equality in law and policy due to their interconnected nature. There was a strong focus on adopting an intersectional approach through law and policy, recognising the many forms of discrimination experienced by particular groups of women, including Traveller and Roma and other ethnic minority groups. Significant inequalities exist both between and among women, with many facing additional barriers to full and equal participation in various areas of society, such as education, employment, and income security. For instance, Traveller women experience disproportionately higher rates of poverty and unemployment, lower educational status, and an elevated risk of various health issues, among other challenges. Through our consultation with members, there was a strong focus on the need for enhanced data collection using intersectional approaches to make data systems more inclusive to improve outcomes for all women and girls. In recognition of the lack of integration across national policies and strategies to date, there is also a need for enhanced coordination and alignment in this area to address the many challenges facing women today. This involves gender mainstreaming to integrate a gender equality perspective at all stages and levels of policies, budgets, and service provision.

## Gender proof and coordinate all national law, policy and strategy

Gender proofing policy is a critical means to promoting women's rights and advancing gender equality. Ireland successfully applied to participate as a beneficiary authority in the European Commission's Technical Support Instrument (TSI) 2022 flagship project on "Gender Mainstreaming in Public Policy and Budget Processes". Despite this step being taken by the State, this two year project is due to conclude in 2024, with what appears to be little progress made in this area. The ultimate goal of the TSI Project on Gender Mainstreaming is to build capacity to integrate gender equality into budgetary and policy making processes across all government departments. This can contribute to reducing gender disparities and to effectively consider how gender interacts with other equality dimensions – to tackle additional barriers experienced by marginalised groups of women. The next NSWG must prioritise gender mainstreaming, ensuring it is integrated into policy development, budgetary decision making, as well as data collection efforts.

Research highlights limited integration across Irish policy, particularly between migration and gender equality.<sup>85</sup> For example, migrant women are not specifically addressed in the Migration Strategy 2017-2021, nor in the current National Strategy for Women and Girls (NSWG). International bodies have also reported poor coordination between the NSWG and the National Traveller and Roma Inclusion Strategy (2024-2028). The development of the next NSWG presents a significant opportunity to promote a coordinated policy approach and ensure alignment with other strategies. It is crucial that the State addresses the systemic inequalities faced by women and girls through a gender mainstreaming approach that prioritises intersectionality and incorporates a gender dimension at every stage of policy-making and implementation. This should be embedded in the next NSWG and, more broadly, in other government strategies that recognise the specific needs of women (through a specific gender lens) and provide tailored responses.

#### **Key actions/indicators**

- Gender proof and impact assess all national policies and strategies, tracking whether policies have unanticipated equality-related effects and are meeting equality objectives
- Ensure integration across national policy and strategy through a joined-up policy and gender mainstreaming approach, including with other equality strategies, the Third National Strategy, among others

### **Legislate for Gender budgeting (to apply to all Government bodies)**

While equality budgeting was introduced on a pilot basis in 2017 with a focus on gender, the scope was rapidly expanded to include other dimensions of equality. This shift occurred before critical gender-specific issues had been fully addressed, significantly limiting progress on gender budgeting. Importantly, equality budgeting has also built on Ireland's framework for performance budgeting, which is a relatively new structure in itself. The government still faces challenges in implementing performance budgeting with a requirement for significant enhancements, including the development of specific targets that link to key national indicators.

The establishment of the Equality Budgeting Interdepartmental Network provides a critical space to drive implementation of gender (equality) budgeting across all Government departments. In tandem to this Network, the Equality Budgeting Expert Advisory Group, set up to guide the overall approach to equality budgeting has not been in operation for a considerable period of time. As outlined above, the EU mission funded Technical Support Instrument (TSI) project to progress gender mainstreaming and gender responsive budgeting in Ireland will complete in 2024. It appears that minimal advancements have been made, and with limited reporting on the project. Although recommended by the OECD, (gender) equality budgeting is not currently required by legislation, and does not apply to all government bodies or local authorities. The OECD<sup>86</sup> has identified numerous challenges with implementation of (gender) equality budgeting in Ireland, including the absence of an overarching equality strategy, lack of a legislative basis or incentives for Departmental engagement, and difficulties with performance budgeting. In line with recommendations of the OECD, NWC is proposing the inclusion of the following actions in the next NSWG.

#### **Key actions/indicators**

- Legislate for (gender) equality budgeting across all Government bodies including local authorities – ensuring that equality considerations are prioritised in a structured format as part of the annual budgetary cycle

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<sup>85</sup> Economic and Social Research Institute. (2023). [Social inclusion and the role of the public services in Ireland.](#)

<sup>86</sup> OECD. (2021). [Strengthening economic and social rights: Summary of findings.](#)

- Develop a set of national equality goals and indicators to inform policy action, budgetary decisions and accountability – this should form part of an improved performance budgetary framework
- Implement the upcoming National Equality Data Strategy to support (gender) equality budgeting. Such a strategy can improve the extent to which official statistics and data provide insight on equality gaps, assess the impact of government measures and inform next steps
- Expand equality budgeting beyond performance budgeting to link it with robust budget policy tools, including gender proofing, gender impact assessments, monitoring compliance of policy with equality goals, and integrating equality related analysis in a more structured manner within the process of spending review
- Support Government Departments to engage with (gender) equality budgeting, including through multi-annual funding arrangements and provide appropriate training and resources

## Data collection

A critical concern remains the lack of comprehensive gender-disaggregated data in areas related to women’s rights and gender equality. The discontinuation of the *Women and Men in Ireland* report by the Central Statistics Office (CSO) after 2019 left a significant gap in the availability of data on gender inequalities across key indicators. While the recent introduction of the Women and Men in Ireland hub is welcome it is imperative that existing data gaps in relation to gender analysis are addressed and comparative data made available across a number of years.

Additionally, the absence of robust, up-to-date data on violence against women has a detrimental impact on the State’s efforts to eliminate all forms of violence against women. The 2023 Survey on Sexual Violence in Ireland was the first comprehensive study on sexual violence since the 2002 Sexual Abuse and Violence in Ireland (SAVI) report. However, further investment is needed to ensure continuous and reliable data collection, as well as the monitoring of trends over time. The commitment in the TNS to ‘develop enhanced coordination of data collection strategies’ must be delivered in consultation with civil society organisations, adhere to human rights principles, and be allocated sufficient resources to ensure long-term sustainability.

The commitment to equality budgeting outlined in the 2020 *Programme for Government*, provided a basis for the introduction of gender budgeting, however, progress has stalled. Gender budgeting, if implemented effectively, can provide the necessary gender-disaggregated data to assess how women are affected by budgetary measures, particularly in areas of taxation, social protection, and public services. It is equally important to ensure that the data generated is used effectively to reduce gender inequalities in practice, and that it informs decision-making to produce tangible improvements for women’s socio-economic outcomes.

Without reliable and comprehensive data, including on violence against women, the effectiveness of services and policy interventions will remain limited. It is essential that the State invests in robust data systems to ensure that policies are informed by evidence and are responsive to the needs of all women, especially those most vulnerable and marginalised. Data must also be disaggregated by specific groups of women—such as Traveller and Roma women, disabled women, and migrant women. This is essential to address the intersectional challenges that certain groups face and to inform targeted policy responses.

It is crucial that sustained investment is allocated to research that explore gender equality and the unique experiences of marginalised groups. This investment will provide the evidence base needed



to inform effective policy development and implementation, ensuring that the diverse needs of all women are recognised and addressed.

#### **Key actions/indicators**

- Address existing data collection gaps through the further development and ongoing monitoring of gender equality indicators
- In the area of VAW, ensure the ‘gold standard’ of data collection and analysis is developed, with An Garda Síochána, Courts system, TUSLA and HSE and other relevant agencies, in consultation with civil society organisations and is in line with human rights based standards
- The Workplace Relations Commission should publish detailed accounts of the cases adjudicated with disaggregated data

## **Outstanding issues**

There were significant shortfalls in the implementation of the current National Strategy for Women and Girls as evidenced in the independent report on evaluation of implementation processes of three equality strategies, including the NSWG. Such gaps include -

- A lack of prioritisation and clarity on implementation of strategy actions
- Lack of robust indicators
- The absence of clear implementation plans
- Lack of an intersectional approach across and within the strategies, including for example, on meeting the particular needs of migrant women, Traveller women, disabled women and women of colour
- Lack of opportunity to amend strategy actions and respond to emerging needs, as required.

The lack of progress indicators for NSWG made it impossible to assess whether the Strategy was being implemented as intended, as no indicator sets were identified or developed prior to its publication. Indicators, including baseline values and targets, are often overlooked during national strategy development. This results in a vague plan that fails to guide on implementation or provide wider stakeholders with measurable, trackable goals and actions on the State’s progress.

In line with the above learnings, NWC is of the view that there is an opportunity through the preparation of a new strategy to further develop and progress key actions on a range of issues relating to the advancement of women’s and girls’ rights. It is imperative, however that any new strategy includes specific commitments with robust actions and indicators, actional plans with clear timelines, and clearly identified bodies responsible for implementation. This much be complemented with appropriate resourcing (clear budget/budget lines) and an effective and sustained monitoring mechanism, including for example, an oversight/implementation committee to achieve full and successful implementation.

The report of the Citizen’s Assembly on Gender Equality provides a strong blueprint for achieving a gender equal Ireland, including a clear action plan, with timelines for implementation. It highlights key areas such as closing the gender pay gap, promoting women’s participation in leadership, and addressing the care economy. The report also emphasises the need for legislative changes and societal shifts to support these goals, ensuring that progress is both measurable and sustained over time. The new National Strategy has the potential to expand on the previous strategy objectives on leadership, social and economic issues, visibility and active participation, healthcare, and gender mainstreaming. It must also address gaps in the current strategy in areas such as poverty, the

ongoing cost of living crisis, housing precarity and homelessness, violence against women, climate change, among others. These new areas for inclusion in the next NSWG are described earlier in this submission.

A cross-departmental and whole-of-society approach is essential for the successful implementation of Ireland's next National Strategy for Women and Girls. By coordinating efforts across government departments, the strategy can address the diverse and interconnected challenges women face, from economic inequality to women's health and caregiving responsibilities. Critically, women and women's organisations must be at the centre of the next Strategy's design, development and implementation to ensure it reflects the lived experiences of women and girls, while fostering collective ownership for its success. An ambitious strategy must be delivered that will drive meaningful, lasting progress toward gender equality across all areas of society. Integral to this, is the inclusion of an intersectional approach to progressing equality for women and girls and ensuring the voices of women from diverse and highly marginalised communities are meaningfully engaged with and are represented at all stages of policy development and implementation.

The development of a new National Strategy for Women and Girls offers an opportunity to significantly build on the last strategy, advance gender equality and empower all women and girls. Women continue to experience significant inequalities across society, with marginalised groups facing multiple forms of discrimination. The structural inequalities facing women must be dismantled and the intersectional forms of discrimination that women face successfully tackled, so that all women and girls, in all their diversity can live a barrier free life.

For further information or to discuss any of the content in this submission/response, you can contact Kate Mitchell, Head of Development and Policy, NWC at [katem@nwci.ie](mailto:katem@nwci.ie).