

Shadow Report

from

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Dublin Rape Crisis Centre
Galway Rape Crisis Centre
Kilkenny Rape Crisis Centre (KASA)
Rape Crisis North East
Tipperary Rape Crisis Centre
Tullamore Rape Crisis Centre
Wexford Rape Crisis

in advance of the examination of Ireland's eighth periodic
report under the UN Convention on the Elimination of all
forms of Discrimination against Women

May 2025

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Overview of recommendations

General

1. Require that criminal justice agencies such as An Garda Síochána, the Courts Service, the Office of the Director of Public Prosecutions and other related State bodies collect and publish disaggregated data to support oversight and targeted interventions.
2. Ensure that data systems across the justice sector are aligned with Ireland's commitments under CEDAW, SDG 5.2, and the Istanbul Convention (Article 11).
3. Develop formal mechanisms to incorporate anonymised NGO service data into the evaluation of DSGBV strategies and programmes.

Women's access to justice

4. Introduce mandatory, ongoing training on gender-sensitive, trauma-informed approaches for all Gardaí, legal professionals and members of the judiciary involved in sexual violence cases.
5. Ensure intersectionality is included in all training programmes to address the specific needs of diverse and marginalised groups of women and girls.
6. Ensure meaningful, structured involvement of relevant civil society organisations, in the delivery of training on gender-sensitive, trauma-informed approaches, drawing on their frontline expertise with victim/survivors.
7. Establish independent evaluation of training content, delivery and outcomes, including the participation of civil society organisations.

Women's access to justice & counselling records

8. Ensure that the drafting of the Criminal & Civil Law (Miscellaneous Provisions) Bill 2025 includes meaningful consultation with victim/survivors and frontline services, leading to an outcome that protects survivors' privacy, dignity and access to justice.

Stereotypes

9. Develop a dedicated, cross-departmental strategy to challenge gender stereotypes in education, media and public discourse, with measurable targets and a monitoring framework.
10. Fully implement the revised Social Personal and Health Education (SPHE) and Relationships and Sexuality Education (RSE) curricula, including media literacy education across all schools, with appropriate teacher training and supports to deliver the content effectively.
11. Strengthen the role of Coimisiún na Meán in addressing harmful gender portrayals in the media, with clear standards and mechanisms for public complaints.
12. Publish the new National Strategy for Women and Girls.

Gender-based violence against women

13. Develop a centralised, disaggregated and harmonised statistical database on all forms of DSGBV.
14. Fully implement GREVIO recommendations with a published timeline.
15. Ensure the independence and statutory authority of the DSGBV Agency, Cuan.
16. Establish a statutory Domestic and Family Violence Death Review mechanism.
17. Review and amend the Domestic Violence Act 2018 to address implementation gaps and improve access to justice and protection.
18. Consolidate existing sexual offence laws into a single statute that retain Ireland's clear, consent-based definition of rape, while streamlining fragmented provisions from multiple Acts to reflect international best practice and the lived experiences of victim/survivors.
19. All frontline workers who interact with victim/survivors of sexual violence must be adequately trained and engage in continual updating of their training to ensure that victim/survivors of sexual violence receive the supports and services they need.
20. The State must provide sufficient, sustainable, multi-annual funding to ensure that civil society and NGOs are able to function effectively to maintain their programmes of work.

Trafficking and exploitation of prostitution

21. Expand access to gender-specific accommodation for women who have been trafficked, beyond the limited capacity currently offered.
22. End the placement of trafficking victims in Direct Provision and ensure all victim/survivors receive appropriate wraparound supports, including legal, medical and psychological support and assistance.
23. Establish a compensation scheme that is accessible, victim/survivor-centred, and compliant with international human rights standards, ensuring that victim/survivors can obtain redress without undue delay.
24. Ensure the full and timely roll-out of the National Referral Mechanism (NRM), accompanied by clear operational guidelines that set out the entitlements, support and assistance available to all identified victims of trafficking.
25. Develop and implement a comprehensive, adequately resourced exit strategy for individuals seeking to leave prostitution, grounded in the lived experience of those effected.

Education

26. Accredited Relationships & Sexuality Education training should be available to all post-primary teachers delivering SPHE/RSE, with core RSE skills embedded in initial teacher education and reinforced through ongoing professional development.

27. Ensure the consistent delivery of RSE across all schools, regardless of school ethos or patronage, to uphold every student's right to inclusive, evidence-based education.
28. Integrate media literacy and critical engagement with online content into the RSE curriculum, to equip young people with the skills to challenge harmful stereotypes and unrealistic portrayals of sex and relationships.

► Rape Crisis Centres

Rape Crisis Centres (RCCs) provide crisis counselling and long-term therapy to those who have experienced rape, sexual assault and childhood sexual abuse. The services include helplines and associated services, one-to-one counselling, medical, Garda and court accompaniment, education and training programmes, policy interventions, public awareness campaigns to prevent sexual violence and data collection and analysis on trends and issue relating to sexual violence. The work carried out by RCCs has prompted social, political and cultural changes in Ireland.

As frontline service providers, we work with and support people who have been directly affected by sexual violence. Through this work, we see the often life-long consequences of the trauma and harm it inflicts. The impact of this abuse is profound, not only due to the violence itself but also because of the silence, disbelief and systemic barriers that victim/survivors frequently encounter in its aftermath.

Throughout this submission, we use the term victim/survivor to acknowledge the varied ways individuals relate to their experiences of sexual violence. Those who contact RCC's have experienced serious harm and, in many cases, criminal acts. They have also endured and survived that trauma. Some identify more strongly with one term than the other. Some do not care for either term.



► About this submission

This shadow report is submitted by a coalition of 8 rape crisis centres across Ireland to contribute to the United Nations Committee on the Elimination of Discrimination against Women's review of Ireland's eighth periodic report under the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).

Rape crisis centres offer a unique and critical perspective on the real-life implementation of Ireland's obligations under the Convention. Our direct work with victim/survivors informs our analysis of gaps in law, policy and service provision and our recommendations for reform. Our report focuses specifically on access to justice, gender-based violence, service provision and the structural inequalities that shape victim/survivor experiences.

A number of the rape crisis centres are members of the Irish Observatory on Violence Against Women, which is chaired by the National Women's Council (NWC);¹ some have also contributed to the shadow report compiled by the Irish Observatory and endorse that report.

While we acknowledge the progress made by the State since its last review, substantial gaps remain that demand urgent and sustained attention. This submission responds to the Committee's 2023 List of Issues Prior to Reporting (LoIPR) and considers the State's 2024 report. It focuses specifically on issues related to sexual violence and engages with several of the LoIPR thematic headings. These have been selected to reflect the key areas where the State's obligations intersect with the core work and expertise of rape crisis centres, namely:

► GENERAL (paragraph 1)

Preventing and responding to violence against women and girls requires evidence-based policymaking, grounded in reliable and comparable data. This requires documenting of the scale and nature of the problem to inform effective policy responses and to monitor the impact of measures undertaken.

Rape Crisis Centres across Ireland welcomed the publication of the Central Statistics Office's Sexual Violence Survey (SVS) in 2022.² This was a significant step toward meeting Ireland's data obligations under CEDAW³ and Sustainable Development Goal 5.2⁴. The SVS provides nationally representative data on sexual violence prevalence, capturing both contact and non-contact experiences and lifetime and childhood exposure.

¹ For more information see the National Women's Council website at:

https://www.nwci.ie/discover/what_we_do/building_the_womens_movement/convening_and_chairing_womens_rights_groups/national_observatory_on_violence_against_women

² <https://www.drcc.ie/news-resources/news/new-data-underscores-urgency-of-tackling-epidemic-of-sexual-violence/#:~:text=Dublin%20Rape%20Crisis%20Centre%20today,viole%20on%20an%20international%20level>.

³ CEDAW concluding observations on Ireland. March 2017

19. The Committee recommends that the State party (d) Take measures to collect data which should, inter alia, be disaggregated by sex, gender, ethnicity, disability and age, in order to inform policy and programmes on women and girls, as well as assist in tracking progress in the achievement of the Sustainable Development Goals

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/IRL/CO/6-7&Lang=En

⁴ Targets and indicators for Sustainable Development Goal 5.2, requiring "Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation" require comparative data as evidence. <https://unstats.un.org/sdgs/metadata/?Text=&Goal=5&Target=5.2>

It fills a longstanding data gap and enables policymakers to better understand the scale of sexual violence in Ireland.⁵

Criminal justice agencies such as An Garda Síochána, the Courts Service, the Office of the Director of Public Prosecutions do not currently disaggregate data as set out by the Committee on victims or accused persons in a systematic or publicly accessible way. Data and information gaps such as these not only limit the State's ability to understand the scale of violence against women and girls in Ireland but to assess its performance and progress in line with international human rights obligations. When the Council of Europe (COE) Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) published its baseline report on Ireland, Grevio urged the Irish authorities to:

*“ensure, as a matter of priority, the systematic collection of comparable data on all forms of violence against women from all relevant administrative sources, including the law-enforcement and justice, healthcare, asylum and social services sectors, and specialist support service providers, disaggregated, at the minimum, by the sex and age of both the victim and the perpetrator, the type of violence, the relationship of the victim to the perpetrator and the geographical location”.*⁶

Data collection must be relevant, coordinated and aligned across relevant agencies. Currently, data is often gathered for narrow, agency-specific purposes rather than within an integrated framework aimed at preventing and responding to domestic, sexual and gender-based violence (DSGBV). While key State bodies, including criminal justice agencies and health services have their own internal data management systems, these systems are not harmonised and the data they generate is rarely comparable across sectors.

The State's recently published Data Catalogue for Key Criminal Justice System Datasets (2024) confirms that variables such as ethnicity, disability and migration status are inconsistently recorded and that microdata is not publicly available. This fragmented approach prevents the State from generating the evidence needed to understand systemic issues such as attrition and to drive meaningful reform. To build a comprehensive picture of violence against women and girls, State agencies must urgently adopt common definitions and coordinated data collection methods. It must also commit to sharing and analysing data in a transparent, cross-sectoral manner.

Furthermore, there is no national system to integrate anonymised data from frontline rape crisis centres, despite the richness of such data for understanding victim/survivor pathways, unmet needs, and systemic gaps.

Recommendations:

1. Require that criminal justice agencies An Garda Síochána, the Courts Service, the Office of the Director of Public Prosecutions and other related State bodies collect and publish disaggregated data to support oversight and targeted interventions.
2. Ensure that data systems across the justice sector are aligned with Ireland's commitments under CEDAW, SDG 5.2, and the Istanbul Convention (Article 11).
3. Develop formal mechanisms to incorporate anonymised NGO service data into the evaluation of DSGBV strategies and programmes.

⁵ CSO Sexual Violence Survey 2022: Main Results <https://www.cso.ie/en/releasesandpublications/ep/p-svsmr/sexualviolencesurvey2022mainresults/keyfindings/>

⁶ GREVIO's (Baseline) Evaluation Report on Ireland, November 2023 <https://rm.coe.int/grevio-s-baseline-evaluation-report-on-legislative-and-other-measures-/1680ad3feb> (59 a)

This kind of data infrastructure is essential to measuring and achieving substantive equality, especially for women and girls at greatest risk of marginalisation.

► **WOMEN'S ACCESS TO JUSTICE** (paragraph 4)

Despite years of advocacy from rape crisis centres and the wider DSGBV sector, Ireland still lacks a systematic, mandatory capacity building programme to ensure gender-sensitive and trauma-informed approaches across the criminal justice system. While there have been some sector-specific and ad hoc training initiatives, these remain inconsistent and are not compulsory.

Although progress has been made, significant gaps persist with victim/survivors continuing to face inconsistent responses at different points of contact within the criminal justice system.^{7 8} The impact of the trauma of sexual violence is not well understood and is not adequately discussed in many of Ireland's institutions including the justice system. Failure to properly train all professionals who interact with victim/survivors of sexual violence can result in unnecessary re-traumatisation. In addition, deeply engrained attitudes and biases relating to sexual activity and gender stereotypes can blind professionals and service providers to the harm or crime and can lead to an inappropriate response.

▪ **An Garda Síochána (AGS)**

Gardaí (Irish police) are often the first point of contact for victim/survivors of sexual violence, making their role particularly significant. AGS has committed to providing a respectful and responsive service to all victims.⁹ The nationwide establishment of Divisional Protective Service Units (DPSUs)¹⁰ is a particularly welcome development, ensuring that vulnerable victims of DSGBV receive consistent, specialist and sensitive support from highly trained detectives. However, gaps remain. Outside of these units, those reporting crimes cannot be assured of a consistent service from frontline Gardaí who may lack the necessary training and awareness to respond appropriately. Specialist services such as rape crisis centres are not included in the design or the delivery of AGS training. On occasion, rape crisis staff may be invited to provide some input but this is done on an ad-hoc basis.

⁷ Lauren Boland (20 March 2025). *Report reveals litany of problems in garda treatment of domestic abuse survivors*. Available at: <https://www.thejournal.ie/report-reveals-litany-of-problems-in-garda-treatment-of-domestic-abuse-survivors-6655212-Mar2025/>

⁸ *Domestic Abuse: An inspection of the Garda Síochána's approach to prevention, protection, prosecution and victim support* (2024). Available at: <https://www.gsinsp.ie/domestic-abuse/>

⁹ <https://www.garda.ie/en/victim-services/>

¹⁰ *AGS Divisional Protective Service Units Now Operational Nationwide* (2020). Available at: <https://www.garda.ie/en/about-us/our-departments/office-of-corporate-communications/press-releases/2020/september/an-garda-siochana-divisional-protective-services-units-now-operational-nationwide-.html>

▪ **The Courts**

Progress has been made in the courts, with the Judicial Council¹¹ offering training to new judges¹² and while these initiatives are welcome there is still no standardised or comprehensive training programme for all legal professionals dealing with sexual offences. Training programmes need to be made available on a consistent basis to all justice system personnel, not just a select few.

There is a pressing need for a coordinated, mandatory approach to ensure all justice personnel can respond to victim/survivors in a gender-responsive and trauma-informed manner. This includes judges, Gardaí (especially those outside of DPSUs) and court staff. Training must also address the specific barriers faced by migrant women, Traveller and Roma women, women with disabilities, LGBTQ+ victim/survivors and others affected by intersecting forms of discrimination.

This has been documented in multiple sources, including:

- The *O'Malley Review (2020)*¹³ recommended training for all involved in sexual offence trials, most notably training for lawyers (Chapter 10)
- *Supporting a Victims Journey* includes a recommendation (9.1) that training should include information around trauma and how it impacts on the delivery of evidence.¹⁴
- And the *Third National Strategy on Domestic, Sexual and Gender-Based Violence (2022–2026)* (TNS) recognises the need for training of An Garda Síochána and Gardaí in the DPSU's,¹⁵ as well as the judiciary, the Courts Service and the legal profession.¹⁶

Notwithstanding the need for reforms being well documented, implementation is fragmented.

Recommendations:

1. Introduce mandatory, ongoing training on gender-sensitive, trauma-informed approaches for all Gardaí, legal professionals and members of the judiciary involved in sexual violence cases.
2. Ensure intersectionality is included in all training programmes to address the specific needs of diverse and marginalised groups of women and girls.
3. Ensure meaningful, structured involvement of relevant civil society organisations, in the delivery of training on gender-sensitive, trauma-informed approaches, drawing on their frontline expertise with victim/survivors.
4. Establish independent evaluation of training content, delivery and outcomes, including the participation of civil society organisations.

¹¹ <https://judicialcouncil.ie/about-the-judicial-council/>

¹² Mary Carolan (September 17th 2021). *New to the bench judges to be trained for the first time*. Available at: <https://www.irishtimes.com/news/crime-and-law/new-to-the-bench-judges-to-be-trained-for-the-first-time-1.4676043>

¹³ O'Malley, T. (2020). *Review of Protections for Vulnerable Witnesses in the Investigation and Prosecution of Sexual Offences*. Available at: <https://assets.gov.ie/static/documents/review-of-protections-for-vulnerable-witnesses-in-the-investigation-and-prosecution-of.pdf>

¹⁴ *Supporting a Victim's Journey: A plan to help victims and vulnerable witnesses in sexual violence cases (2020)*. Available at: <https://assets.gov.ie/static/documents/supporting-a-victims-journey-a-plan-to-help-victims-and-vulnerable-witnesses-in-sexual.pdf>

¹⁵ Department of Justice (2022). *Zero Tolerance: Third National Strategy on Domestic, Sexual & Gender-Based Violence Implementation Plan*. Available at: <https://assets.gov.ie/static/documents/dsgbv-implementation-plan.pdf> Action 3.5.1, pg.38

¹⁶ Ibid. Action 3.1.1, pg. 31

Ireland is obligated under CEDAW Article 15 and General Recommendation 33 on Women's Access to Justice is to ensure that justice systems are accessible, fair, and responsive to the lived experiences of all women, including victim/survivors of sexual violence. The current framework does not yet meet this standard.

► Further Concerns: Women's Access to Justice & Counselling Records

The routine request for the disclosure of therapeutic records in sexual offence trials has a chilling effect on victim/survivors,¹⁷ who may fear that deeply personal and sensitive information will be used to undermine their credibility in court. This risk can deter individuals from seeking the counselling and support services they deserve.¹⁸ The Department of Justice has recently secured approval to draft the Criminal and Civil Law (Miscellaneous Provisions) Bill 2025.¹⁹ Rape Crisis Centres view this as a significant opportunity for meaningful consultation with all relevant support services and with victim/survivors themselves. Such engagement is essential to ensure that the reforms uphold victim/survivors' rights to privacy, dignity and access to justice, under Articles 2 and 15 of the Convention.

Recommendations:

1. Ensure the drafting of the Criminal and Civil Law (Miscellaneous Provisions) Bill 2025 includes meaningful consultation with victim/survivors and frontline services, leading to an outcome that protects survivors' privacy, dignity, and access to justice.

► STEREOTYPES (paragraph 8)

Harmful gender stereotypes about women's roles in families and society, including around sexuality, consent and victim-blaming, continue to permeate Irish culture. There have been some recent efforts; the TNS includes a goal of working towards the eradication of the social and cultural norms that underpin and contribute to gender-based violence²⁰ and the *National Strategy for Women and Girls (2017–2020)*²¹ sought to promote greater understanding of gender equality, although the absence of a current successor strategy leaves a significant gap in this area.

¹⁷ Eithne Dodd (7 May 2025) *Handing over counselling notes was 'soul destroying' – victim* Available at:

<https://www.rte.ie/news/ireland/2025/0507/1511466-handing-over-counselling-notes-soul-destroying-victim/>

¹⁸ Carl O'Brien (17 January 2025) *Calls for law to be changed to end access to rape victims' counselling notes* Available at:

<https://www.irishtimes.com/crime-law/courts/2025/01/17/calls-for-law-to-be-changed-to-end-access-to-rape-victims-counselling-notes/>

¹⁹ <https://www.gov.ie/en/department-of-justice/press-releases/minister-jim-ocallaghan-secures-government-approval-to-progress-the-general-scheme-of-the-criminal-law-and-civil-law-miscellaneous-provisions-bill-2025/#:~:text=Press%20release->

[.Minister%20Jim%20O'Callaghan%20secures%20government%20approval%20to%20progress%20the, Law%20\(Miscellaneous%20Provisions\)%20Bill%202025&text=Bill%20includes%20measures%20to%3A, offences%20around%20'sex%20for%20rent'](https://www.gov.ie/en/department-of-justice/press-releases/minister-jim-ocallaghan-secures-government-approval-to-progress-the-general-scheme-of-the-criminal-law-and-civil-law-miscellaneous-provisions-bill-2025/#:~:text=Press%20release-)

²⁰ Department of Justice (2022). *Zero Tolerance: Third National Strategy on Domestic, Sexual & Gender-Based Violence Implementation Plan*. Available at: <https://assets.gov.ie/static/documents/dsgbv-implementation-plan.pdf> Goal 1, Pg. 3

²¹ Department of Justice and Equality (2017). *National Strategy for Women and Girls 2017–2020: creating a better society for all* <https://assets.gov.ie/6427/88cc57e206a34e94aef2310f2b100d5.pdf>

Notwithstanding these, stereotypes continue to shape the experiences of women and girls in Ireland, including within the criminal justice system and online and can negatively affect help-seeking pathways.

In November 2024, the European Commission published a Flash Eurobarometer on Gender Stereotypes on Violence against Women²² from across the 27 EU member states, including over 1,000 people in the Republic, to better understand the attitudes of EU citizens that present substantial obstacles to the advancement of equality and human rights.

Almost one in seven Irish people believe a woman is at least partially responsible if she suffers sexual violence while under the influence of alcohol or drugs, according to the findings of that research.²³ In early 2025, Dublin Rape Crisis Centre published research on public attitudes towards sexual violence in Ireland which found that one in eight people would be unsure or express doubts if someone told them they had been raped or experienced sexual violence while under the influence of drink or drugs. This scepticism was highest among under men under 25 (23%).²⁴ Such stereotypes frequently result in the victimisation and marginalisation of women.

In courtrooms, victim/survivors of sexual violence are still subject to outdated and damaging myths, based on appearance, alcohol use, sexual history and delays in reporting, all of which undermine their credibility in court. They can still face scrutiny based on their character rather than the accused's actions, as seen in the public backlash following the use of a young woman's underwear as evidence in 2018.²⁵ Despite recommendations from the O'Malley Review,²⁶ statutory training for judges and legal professionals on rape myths is still not fully embedded. These stereotypes not only retraumatise victim/survivors but also impact their access to justice.

While public awareness campaigns such as *We-Consent*²⁷ and the State's own "*Let's have the consent conversation*"²⁸ have helped to shift cultural attitudes and public perception, there is no national strategy to dismantle stereotypes.

Despite the work of the National Council for Curriculum and Assessment (NCCA) in revising the Social, Personal and Health Education (SPHE) and the Relationships and Sexuality Education (RSE) curricula to reflect contemporary understandings of gender, consent and respectful relationships, these reforms have not yet been fully implemented across schools. Teachers often lack the training needed to deliver gender-sensitive content and school ethos continues to shape inconsistent delivery of RSE.

²² Eurobarometer on Gender Stereotypes on Violence against Women (December 2024) Available at:

https://ec.europa.eu/commission/presscorner/detail/en/statement_24_5989

²³ Seán McCárthaigh (2 December 2024) Available at: <https://www.independent.ie/irish-news/one-in-seven-irish-people-believe-women-are-partially-responsible-for-sexual-violence-if-influenced-by-drugs-or-alcohol/a742508820.html>

²⁴ Dublin Rape Crisis Centre (April 2025) *Research on public perceptions on sexual violence in Ireland* Available at:

https://www.drcc.ie/assets/files/pdf/2025_04_briefing_note_drcc_research_on_sexual_violence_final.pdf and <https://www.drcc.ie/news-resources/resources/video-overview-of-research-into-attitudes-on-sexual-violence/>

²⁵ Marie O'Halloran (13 November 2018) *TD holds up thong in Dáil in protest at Cork rape trial* comments Available at:

<https://www.irishtimes.com/news/politics/oireachtas/td-holds-up-thong-in-dail-in-protest-at-cork-rape-trial-comments-1.3696564>

²⁶ O'Malley, T. (2020). *Review of Protections for Vulnerable Witnesses in the Investigation and Prosecution of Sexual Offences*.

Available at: <https://assets.gov.ie/static/documents/review-of-protections-for-vulnerable-witnesses-in-the-investigation-and-prosecution-of.pdf> Pg. 122

²⁷ <https://www.we-consent.ie/>

²⁸ <https://www.gov.ie/en/department-of-justice/campaigns/consent/>

Online, the problem is growing. Women in politics²⁹ or those with a public online presence³⁰ frequently experience targeted misogyny and harassment.

While the Online Safety and Media Regulation Act 2022³¹ and the establishment of *Coimisiún na Meán*, the media regulator in Ireland,³² mark a positive step, regulation remains limited in scope and enforcement.

The gaps identified contravene Ireland's obligations under CEDAW Article 5, which calls on states to eliminate prejudices and practices based on stereotyped roles for men and women.

Recommendations:

1. Develop a dedicated, cross-departmental strategy to challenge gender stereotypes in education, media and public discourse, with measurable targets and a monitoring framework.
2. Fully implement the revised Social Personal and Health Education (SPHE) and Relationships and Sexuality Education (RSE) curricula, including media literacy education across all schools, with appropriate teacher training and supports to deliver the content effectively.
3. Strengthen the role of *Coimisiún na Meán* in addressing harmful gender portrayals in the media, with clear standards and mechanisms for public complaints.
4. Publish the new *National Strategy for Women and Girls*.

► GENDER-BASED VIOLENCE AGAINST WOMEN (paragraphs 9 & 10)

Ireland has made progress in addressing gender-based violence (GBV) against women, notably through the development of national strategies and more recently the establishment of a statutory agency, Cuan, dedicated to domestic, sexual and gender-based violence (DSGBV).³³ However, gaps remain.

■ Paragraph 9

(a) Comprehensive Statistical Data: As referenced in the General section, the lack of disaggregated data continues to impede Ireland's ability to fulfil its obligations under CEDAW and the Istanbul Convention (Articles 11 and 68). This further highlights the need for a national, centralised disaggregated database. While several data sources exist, such as those from An Garda Síochána, the Courts Service, Office of the DPP and NGOs, they are neither harmonised nor integrated. This data gap limits the State's ability to effectively

²⁹ National Women's Council (2024) *Women Beyond the Dáil* Available at: https://www.nwci.ie/images/uploads/Women_Beyond_the_Dail_2024.pdf Pg. 17

³⁰ Claire Henry (24 November 2023) Available at: <https://www.breakingnews.ie/ireland/man-jailed-for-terrible-attack-on-social-media-influencer-charleen-murphy-1556413.html>

³¹ <https://www.irishstatutebook.ie/eli/2022/act/41/section/45/enacted/en/html>

³² <https://www.cnam.ie/about/who-we-are/>

³³ Department of Justice (23 February 2024) *Minister McEntee opens Cuan – the new statutory domestic, sexual and gender-based violence agency* Available at: <https://www.gov.ie/en/department-of-justice/press-releases/minister-mcentee-opens-cuan-the-new-statutory-domestic-sexual-and-gender-based-violence-agency/#:~:text=The%20Agency%2C%20which%20is%20called,needs%20of%20victims%20and%20survivors>

monitor outcomes under the Third National Strategy and to fulfil its international treaty obligations.

(b) Implementation of GREVIO Recommendations: The 2023 Baseline Evaluation Report from GREVIO identified several significant issues in Ireland's³⁴ efforts to combat violence against women, including shortcoming in data collection, judicial practices and barriers to justice for survivors, especially around access to legal advice and the fear of having counselling notes disclosed. The State has accepted the GREVIO report and committed to reviewing its findings. Some recommendations, such as establishing a statutory DSGBV agency, have been addressed. The State has not yet published an action plan to implement all GREVIO recommendations.

(c) Domestic, Sexual and Gender-Based Violence Agency: The establishment of the statutory DSGBV Agency, Cuan, in 2024 is a major milestone. While scoping work has begun to explore how the voices of victim/survivors can be meaningfully embedded in the agency's work, this remains at an early stage and has not yet resulted in formal structures for participation. Plus, the agency's mandate lacks clarity on their enforceable powers in relation to holding other state bodies accountable for their roles in responding to gender-based violence. Without robust oversight and mechanisms for victim/survivor participation, there is a risk that the agency may fall short of driving the coordinated and systemic change required under CEDAW and the Istanbul Convention.

(d) Familicide and Domestic Homicide Reviews: The 2022 *Familicide Study*,³⁵ commissioned by the Department of Justice, made clear recommendations for establishing a multidisciplinary Domestic and Family Violence Death Review mechanism. Such a review process is essential not only for learning from past tragedies but also for identifying systemic gaps and driving reform. Implementation however, is still pending

(e) Review of the Domestic Violence Act 2018: The Domestic Violence Act 2018 was a significant legislative development. It strengthened the legal protections available to victim/survivors of domestic violence and a new offence of coercive control was established. However, while the Act improved upon previous legislation, it remains primarily positioned towards private, civil law responses, rather than promoting a proactive, State-led responses which recognises domestic abuse as a public wrong³⁶. A review of the Act is warranted to assess its implementation and to identify gaps particularly in relation protection, enforcement and intersectional access to justice.

■ Paragraph 10

(b) Definition of Rape in Criminal Law: While Ireland has adopted a consent-based legal definition of rape in Section 48 of the Criminal Law (Sexual Offences) Act 2017, the continued reliance on earlier legislation, namely the Criminal Law (Rape) Act 1981 and the Criminal Law (Rape) (Amendment) Act 1990, has resulted in a fragmented and outdated

³⁴ GREVIO Baseline Evaluation Report Ireland (2023) Available at: <https://rm.coe.int/grevio-s-baseline-evaluation-report-on-legislative-and-other-measures-/1680ad3feb>

³⁵ Department of Justice (2023) Study on Familicide & Domestic and Family Violence Death Reviews Available at: <https://assets.gov.ie/static/documents/study-on-familicide-domestic-and-family-violence-death-reviews.pdf>

³⁶ Leahy, Susan (2023) *What has been done: Still a private matter? Evaluating the Irish State's response to domestic abuse* Available at: <https://academic.oup.com/lawfam/article/37/1/ebad008/7163204>

legal framework.³⁷ These overlapping Acts differentiate between types of rape and forms of penetration in ways that do not reflect a contemporary understanding of sexual violence or the lived experiences of victim/survivors. It can also reinforce harmful hierarchies of harm that are out of step with the trauma experienced. The consolidation of these laws into a single statute that enshrines a clear, consent-based and inclusive definition of rape is essential. Such a reform would provide legal clarity and send a stronger message that all non-consensual sexual acts are equally serious.

It would also bring Irish law into line with international best practice, including CEDAW and the Istanbul Convention, both of which call for comprehensive, consent-based definitions of sexual violence grounded in human rights and gender equality.

(c) Capacity-Building for Police and Prosecutors: Under the heading *Women's Access to Justice*, we highlighted the lack of systematic and mandatory training for Gardaí and prosecutors to build capacity in gender-sensitive and trauma-informed approaches throughout the criminal justice system.

(d) Front-Line Training Across Public Bodies: There is currently no national training framework in place for front-line staff across public services who engage with victim/survivors of DSGBV. Such training must also include content that focuses on harmful practices such as early and forced marriage and female genital mutilation (FGM), as well as the barriers faced by marginalised groups, including migrant women, Traveller and Roma women and women with disabilities. While the Third National Strategy acknowledges the need for such training,³⁸ concrete steps must be taken to resource the delivery across all relevant public bodies.

(e) Resourcing NGOs: Despite the additional €6.3 million allocated to organisations supporting victims of crime and abuse in 2024,³⁹ civil society and NGOs in the DSGBV sector continue to operate without access to secure, multi-annual funding streams. This prevents services from being able to plan ahead. The sector is also heavily dependent on charitable donations and fundraising events to keep services operating. This lack of sufficient, sustainable funding impacts the sectors ability to recruit and retain skilled staff and risks leaving rape crisis centres and other specialist services unable to meet the counselling and therapeutic needs of victim/survivors of sexual violence in a timely way. This funding insecurity also places a significant strain on the limited resources of the sector, particularly their staff. Sustainable State funding is not just a practical necessity, it is a reflection of how seriously the State takes its obligation to support those affected by such serious violations.

Recommendations:

1. Develop a centralised, disaggregated and harmonised statistical database on all forms of DSGBV.
2. Fully implement GREVIO recommendations with a published timeline.

³⁷ Law Reform Commission (2019) Fifth Programme of Law Reform Available at: https://www.lawreform.ie/_fileupload/Programmes%20of%20Law%20Reform/LRC%20120-2019%20Fifth%20Programme%20of%20Law%20Reform.pdf Para 1.18, pg.7

³⁸ Department of Justice (2022). *Zero Tolerance: Third National Strategy on Domestic, Sexual & Gender-Based Violence Implementation Plan*. Action 1.4.1, 1.4.2, pg. 13. Available at:

³⁹ Department of Justice (2024). Minister McEntee details €6.3 million in additional funding for domestic and sexual violence services Available at: <https://www.gov.ie/en/department-of-justice/press-releases/minister-mcentee-details-63-million-in-additional-funding-for-domestic-and-sexual-violence-services/>

3. Ensure the independence and statutory authority of the DSGBV Agency, Cuan.
4. Establish a statutory Domestic and Family Violence Death Review mechanism.
5. Review and amend the Domestic Violence Act 2018 to address implementation gaps and improve access to justice and protection.
6. Consolidate existing sexual offence laws into a single statute that retain Ireland's clear, consent-based definition of rape, while streamlining fragmented provisions from multiple Acts to reflect international best practice and the lived experiences of victim/survivors.
7. All frontline workers who interact with victim/survivors of sexual violence must be adequately trained and engage in constant updating of their training to ensure that victim/survivors of sexual violence receive the supports and services they need.
8. The State must provide sufficient, sustainable, multi-annual funding to ensure that civil society and NGOs are able to function effectively to maintain their programmes of work.

► **TRAFFICKING AND EXPLOITATION OF PROSTITUTION (paragraph 11)**

Ireland has taken some positive steps to strengthen its response to trafficking and the exploitation of prostitution. The *Third National Action Plan to Combat and Prevent Human Trafficking*⁴⁰ and the *Criminal Law (Sexual Offences and Human Trafficking) Act 2024*, which places the National Referral Mechanism (NRM)⁴¹ on a statutory footing, represent important progress. However, significant gaps remain in how the State addresses the gendered realities of trafficking and exploitation. Chief among these is the lack of gender-specific⁴² and trauma-informed accommodation for women who have been trafficked. Notwithstanding the opening of the State's first specialised accommodation unit, Rosa's Place,⁴³ for female victims of human trafficking, many other victim/survivors are still being accommodated in direct provision which may compound their vulnerability. Without appropriate housing and wraparound supports, many women remain at risk of further harm.

The US State Department Trafficking in Persons Report (TIP Report) raises concern that the numbers of identified victims in Ireland is declining with just 53 victims identified in 2024, compared to 95 in 2016.⁴⁴ According to the Irish Human Rights and Equality Commission (IHREC), sexual exploitation remains the most common form of trafficking accounting for 55% of identified cases.⁴⁵

⁴⁰Department of Justice (2023) *Third National Action Plan to combat and prevent Human Trafficking* Available at:

<https://assets.gov.ie/static/documents/third-national-action-plan-to-combat-and-prevent-human-trafficking.pdf>

⁴¹ <https://www.irishstatutebook.ie/eli/2024/act/28/enacted/en/print#part3> Part 3, Chapter 1

⁴² Irish Human Rights and Equality Commission (2023) *Trafficking in Human Beings in Ireland, Second Evaluation of the Implementation of the EU Anti-Trafficking Directive* Available at: https://www.ihrec.ie/app/uploads/2023/09/Trafficking-in-Human-Beings-in-Ireland-Digest_FA_web-Final.pdf.

⁴³ The Passage (April 2024) *An overview of homelessness and human trafficking in Dublin* Available at: <https://ie.depaulcharity.org/wp-content/uploads/sites/2/2024/04/An-overview-of-homelessness-and-human-trafficking-in-Dublin-3-1.pdf> pg. 27.

⁴⁴ US Department of State (2024) *2024 Trafficking in Persons Report: Ireland* Available at: <https://www.state.gov/reports/2024-trafficking-in-persons-report/ireland/>

⁴⁵ Irish Human Rights and Equality Commission (2023) *Trafficking in Human Beings in Ireland, Second Evaluation of the Implementation of the EU Anti-Trafficking Directive* Available at: https://www.ihrec.ie/app/uploads/2023/09/Trafficking-in-Human-Beings-in-Ireland-2023_FA_web-Final.pdf pg. 7

Further research in 2023 by the Sexual Exploitation Research Programme (SERP) highlighted the particular vulnerabilities of children in care to trafficking for sexual exploitation.⁴⁶ This data and research underscores the need for more proactive and targeted measures to safeguard those most at risk of trafficking and sexual exploitation, particularly children in the care system.

The recent publication of the review of Part 4 of the *Criminal Law (Sexual Offences) Act 2017*⁴⁷ confirmed what frontline services have long observed: that exit strategies for those seeking to leave prostitution are limited and fail to provide sustainable pathways out of exploitation. This highlights the urgent need for adequately resourced exit strategies, grounded in the lived experiences of those directly affected.

The ongoing work of the Law Reform Commission on compensation for victims/survivors of DSGBV, including victims of trafficking, is a welcome development. It is crucial that the resulting recommendations support the establishment of a victim-centred, trauma-informed compensation framework that recognises the specific harms experienced and ensures timely and accessible redress.

A gender-specific, rights-based approach is essential to ensure that Ireland's legal and policy frameworks effectively support women who are trafficked or exploited through prostitution, in line with the obligations under CEDAW Articles 6 and 11.

Recommendations:

1. Expand access to gender-specific accommodation for women who have been trafficked, beyond the limited capacity currently offered.
2. End the placement of trafficking victims in Direct Provision and ensure all victim/survivors receive appropriate wraparound supports, including legal, medical and psychological support and assistance.
3. Establish a compensation scheme that is accessible, victim/survivor-centred, and compliant with international human rights standards, ensuring that victim/survivors can obtain redress without undue delay.
4. Ensure the full and timely roll-out of the National Referral Mechanism (NRM), accompanied by clear operational guidelines that set out the entitlements, support and assistance available to all identified victims of trafficking.
5. Develop and implement a comprehensive, adequately resourced exit strategy for individuals seeking to leave prostitution, grounded in the lived experience of those effected.

► NON-GOVERNMENTAL ORGANISATIONS (paragraph 14)

Non-governmental organisations, including rape crisis centres, play a vital role in providing frontline services, advocating for systemic change and advancing the rights of women and girls under CEDAW.

⁴⁶ Canning et al (2023) *Protecting against Predators: A Scoping Study on the Sexual Exploitation of Children and Young People in Ireland*, SERP Available at: <https://serp.ie/wp-content/uploads/2023/06/Protecting-Against-Predators-FULL.pdf> pg. 18

⁴⁷ Department of Justice (2025) *Review on the Operation of Section 7A of the Criminal Law (Sexual Offences) Act 1993* Available at: <https://assets.gov.ie/static/documents/review-on-the-operation-of-section-7a-of-the-criminal-law-sexual-offences-act-1993.pdf>

Despite ongoing recognition by the State of their importance, as noted in paragraph 10(e) under the section on Gender-Based Violence Against Women, these organisations continue to operate without secure multi-annual funding.

► EDUCATION (paragraph 16)

We touched on this topic under the heading of Stereotypes. Access to high-quality, age-appropriate and inclusive relationships and sexuality education (RSE) is a critical tool in preventing sexual violence and advancing gender equality.

(b) Training and Support for Educators: Ensuring that teachers responsible for delivering RSE receive adequate training and ongoing support is crucial. Educators need to be equipped with the necessary skills, knowledge and confidence to deliver RSE in a manner that is inclusive, age-appropriate and responsive to the diverse needs and identities of all students. Currently, there is no requirement for a specific qualification or accreditation to teach RSE in schools. Training remains voluntary and so does not reach all teachers involved in delivering Social, Personal and Health Education (SPHE) and RSE.

Many newly qualified teachers report feeling unprepared to teach RSE effectively.⁴⁸ The 2019 Teach-RSE project⁴⁹ highlighted the importance of building student teachers' competence and confidence in this area by embedding a broad range of RSE-related skills into initial teacher education. Without targeted investment in training and ongoing professional development, the State risks compromising the quality and effectiveness of RSE throughout the education system.

(c) Measures for mandatory, standardised, age-appropriate RSE: Comprehensive, rights-based RSE is essential for promoting gender equality, preventing gender-based violence and supporting young people to make informed decisions about their sexual and reproductive health. However, despite recent reforms, its delivery remains inconsistent and is often shaped by the ethos of individual schools, many of which are under religious patronage. This ethos can influence what is taught, how it is taught and whether some topics are addressed at all. Teachers may struggle to balance the school's ethos with the need to provide inclusive, evidence-based education, because there is uncertainty over what content is allowed and how to approach it.

The content young people encounter online must also be included within the RSE curriculum in a manner that is appropriate to their age and stage of development. Research by Women's Aid⁵⁰ and the Children's Rights Alliance⁵¹ has shown how exposure to pornographic content can shape harmful attitudes towards sex and relationships.

⁴⁸ Katherine Donnelly (24 March 2022) *Student teachers are not trained to deliver classes in relationships and sex education, says report*. Available at: <https://www.independent.ie/irish-news/student-teachers-are-not-trained-to-deliver-classes-in-relationships-and-sex-education-says-report/41482352.html>

⁴⁹ Maunsell et al (2019) *TEACH-RSE: Research Report* Available at: https://www.dcu.ie/sites/default/files/staff/2022-03/TEACH-RSE%20Research%20Report_Final.pdf

⁵⁰ Breslin et al (2024) *Facing Reality: Addressing the role of pornography in the pandemic of violence against women and girls* (SERP) Available at: https://serp.ie/wp-content/uploads/2024/10/WA_SERP_Report_FINAL.pdf

⁵¹ CRA (2025) *Online Safety Monitor: Safeguarding Children's Rights Online* Available at: <https://childrensrights.ie/wp-content/uploads/2025/04/Online-Safety-Monitor-2025.pdf>

These studies highlight the importance of integrating media literacy into RSE to help students critically engage with and challenge the unrealistic portrayals of sex and gender that are widespread online.

RSE must be inclusive of all students including those with varying levels of literacy, cognitive ability and neurodiversity. To ensure consistent and effective delivery, educators require training and ongoing support. Only then can all young people be equipped with the skills and understanding they need to navigate relationships safely and with confidence and respect.

Recommendations:

1. Accredited RSE training should be available to all post-primary teachers delivering SPHE/RSE, with core RSE skills embedded in initial teacher education and reinforced through ongoing professional development.
2. Ensure the consistent delivery of RSE across all schools, regardless of school ethos or patronage, to uphold every student's right to inclusive, evidence-based education.
3. Integrate media literacy and critical engagement with online content into the RSE curriculum to equip young people with the skills to challenge harmful stereotypes and unrealistic portrayals of sex and relationships.

► Conclusion

Ireland has made meaningful progress since 2017, particularly through the ratification of the Istanbul Convention and the development of national strategies. However, many structural and systemic issues persist, especially those that limit survivors' access to justice, undermine their privacy and safety, and constrain frontline service capacity.

We urge the Committee to maintain its focus on the issues highlighted. Realising Ireland's obligations under CEDAW will only be possible when victim/survivor rights are consistently upheld in law, in policy and in practice.

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