



Department of Children, Equality, Disability, Integration and Youth:

Consultation on a new National Strategy for Women and Girls

Submission by the Ombudsman for Children's Office

October 2024

Contents

1. Introduction	1
2. Children’s rights	1
3. Education and equal opportunities	2
4. Health	6
5. Child Protection and Safety	13
6. Economic Security	16

1. Introduction

The Ombudsman for Children's Office (OCO) is an independent statutory body, which was established in 2004 under the Ombudsman for Children Act 2002, as amended (2002 Act). One of the OCO's core statutory functions under the 2002 Act is to promote the rights and welfare of children up to the age of 18 years. The OCO has prepared this submission pursuant to Sections 7(1)(a) of the 2002 Act, which provides for the Ombudsman for Children to advise any Minister of the Government on the development and coordination of policy relating to children, and Section 7(4) of the 2002 Act, which provides for the Ombudsman for Children to advise any Minister of the Government on any matter relating to the rights and welfare of children.

The OCO welcomes the development of a new National Strategy for Women and Girls (Strategy) along with the stated intention for this new Strategy to expand on the progress made by the previous Strategy and to help advance the rights of women and girls. We acknowledge the many positive developments that have occurred since the first Strategy was published in 2017 including:

- Ratification of the Istanbul Convention.
- Ongoing implementation of the Zero Tolerance Strategy, which includes a recognition of children as victims of domestic violence.
- Publication and ongoing implementation of the Family Justice Strategy and Youth Justice Strategy.
- Enactment of the Criminal Law (Sexual Offences and Human Trafficking) Act 2024.
- Publication of the National LGBTI+ Inclusion Strategy and the commencement of a consultation for the successor strategy

In preparing this submission, the OCO has been mindful of the wide-ranging experience and expertise of the many stakeholders who may contribute to this consultation. Correspondingly the purpose of our submission is to highlight some of the issues which we believe should be considered when developing the new Strategy to ensure that the rights of girls are more fully protected in this area.

2. Children's rights

By ratifying the United Nations Convention on the Rights of the Child (UNCRC) in 1992, Ireland made an oath under international law to respect, protect and fulfil the rights of all children living in Ireland. These rights include the four general principles, which are integral to the realisation of all children's rights under the UNCRC:

- Article 2 provides that all children must be able to enjoy their rights without discrimination of any kind, irrespective of their circumstances or those of their parents/guardians.
- Article 3 requires children's best interests be treated as a primary consideration in all actions concerning them.
- Article 6 recognises children's right to life, survival and development. In this regard, States are expected to interpret 'development' as a holistic concept encompassing all aspects of children's development and are obliged to provide optimal conditions for childhood.¹

¹ UN Committee on the Rights of the Child (2003), [General Comment No.5: General measures of implementation of the Convention on the Rights of the Child](#) CRC/CGC/2003/5, p.4.

- Article 12 provides for children’s right to express their views freely in all matters affecting them and for due weight to be given to children’s views, in accordance with their age and maturity.

Children’s right to equality and non-discrimination are connected to, and indivisible from, their other rights under the UNCRC. Among these rights are children’s rights to: freedom of thought, conscience and religion; freedom of association and peaceful assembly; privacy and protection from unlawful attacks on their honour or reputation; the highest attainable standard of health; education; rest, play and leisure; the protection of rights of children from minority groups; protection from all forms of harm and abuse, protection from economic exploitation; and for disabled children the enjoyment of a full and decent life in conditions that ensure dignity.

It has been argued that the development of the UNCRC was necessary because the principle of non-discrimination was insufficiently developed in international and regional human rights instruments for them to effectively counter child discrimination and this was due partly to their inadequacy to protect children against all kinds of child-specific discrimination.² It has also been argued that children have these specific rights to protect them, as they can be made more vulnerable than other people because of their young age and dependence on adults.³

The OCO notes that the previous National Strategy for Women and Girls, 2017 – 2020, made no reference to the additional rights held by children under the UNCRC. In order to ensure that the particular rights and vulnerabilities of children are taken into account, **the position of children as individual rights holders, along with their specific rights contained in the UNCRC, should be considered and incorporated where necessary into the National Strategy for Women and Girls.**

In light of Ireland’s obligations to give children the opportunity to express their views in all matters affecting them, with due weight being given to these views in accordance with their age and maturity as contained in Article 12 of the UNCRC, **the OCO recommends that consultations be held with children and young people to seek their views as part of the development of this new Strategy.**

3. Education and equal opportunities

Access to STEM education

Article 29 of the UNCRC Article 29 outlines the aims of education and provides that the education of the child shall be directed to:

- a) The development of the child's personality, talents and mental and physical abilities to their fullest potential;
- b) The development of respect for human rights and fundamental freedoms, and for the principles enshrined in the Charter of the United Nations;
- c) The development of respect for the child's parents, his or her own cultural identity, language and values, for the national values of the country in which the child is living, the country from which he or she may originate, and for civilizations different from his or her own;

² Besson, S. (2005). [The Principle of Non-Discrimination in the Convention on the Rights of the Child](#), *The International Journal of Children's Rights*, 13(4), pp. 433-461.

³ Child Rights International Network, [Child's Rights 101](#).

- d) The preparation of the child for responsible life in a free society, in the spirit of understanding, peace, tolerance, equality of sexes, and friendship among all peoples, ethnic, national and religious groups and persons of indigenous origin;
- e) The development of respect for the natural environment.

The UN Committee on the Rights of the Child has outlined how discrimination, either overt or hidden, can undermine or destroy the capacity of girls to benefit from educational opportunities as “gender discrimination can be reinforced by practices such as a curriculum which is inconsistent with the principles of gender equality, by arrangements which limit the benefits girls can obtain from the educational opportunities offered, and by unsafe or unfriendly environments which discourage girls’ participation”.⁴ This statement, although drafted in 2001, remains relevant as these aims of education as contained in the UNCRC can be limited for girls trying to access STEM subjects.

The OCO welcomes that the previous Strategy acknowledged the underrepresentation of girls and women in STEM careers. We also welcome the publication of the [STEM Education Implementation Plan to 2026](#) which aims to “ensure that learners have a positive engagement with STEM education, while also increasing the uptake of STEM related subjects for learners of all backgrounds, ability and gender”. However, we are concerned at the available data which shows significant differences in the level of uptake of STEM subjects⁵ between boys and girls.⁶ We are also concerned at the variations in availability of STEM subjects across different school types, with 94% of boys’ schools, 82% of girls’ schools and 66% of mixed schools providing biology, chemistry and physics. Of particular concern is that the percentage of girls’ schools offering a STEM subject other than maths or a science at senior cycle is 68% compared to 95% of boys’ schools and 87% of mixed schools. Figures at Junior Certificate level are also concerning with 26.9% of 3rd year girls studying a STEM subject other than science or maths compared to 73.4% of boys.

The OCO recommends that the new Strategy contain outcomes and aims to advance girls access to STEM subjects, with a particular focus placed on the availability of STEM subjects other than maths or science in all-girl schools.

Parental leave

Census 2022 reported 186,487 one-parent families headed by a woman and 33,509 one-parent families headed by a man in Ireland.⁷ The OCO is concerned by the lack of consideration given to one-parent families in policy and schemes on leave for parents and the impact this has on children in one parent families. While we acknowledge that this is an issue that can affect one-parent families headed by both mothers and fathers, the data available shows that 85% of one-parent families are headed by women so we are of the view that this should be considered during the development of the new Strategy.

Although the UNCRC does not provide an explicit right to parental leave, access by parents to leave to care for their child is a children’s rights issue. The children’s rights that are engaged in this context, include:

⁴ UN Committee on the Rights of the Child (2001), [General Comment no. 1 Article 29 \(1\): The Aims of Education](#) CRC/GC/2001/1, para.10.

⁵ The Department of Education [Education Indicators for Ireland 2023](#) identifies STEM subjects at Leaving Certificate as agricultural science, mathematics, applied mathematics, biology, physics, chemistry, physics and chemistry, engineering, construction studies, design and communication graphics and technology.

⁶ Department of Education (2023), [Education Indicators for Ireland 2023](#) pp.21-22 and pp.47-48.

⁷ CSO (2023), [Press Statement Census 2022 Results Profile 3 - Households, Families and Childcare](#).

- children’s right to life, survival and development (Article 6);
- children’s right to an adequate standard of living for their physical, mental, spiritual, moral and social development (Article 27); and
- the State’s obligation to assist parents in the performance of their child-rearing responsibilities towards children (Article 18).

The UN Committee on the Rights of the Child General Comment on early childhood states that “realising children’s rights is in large measure dependent on the well-being and resources available to those with responsibility for their care. Recognising these interdependencies is a sound starting point for planning assistance and services to parents, legal guardians and other caregivers”⁸ and “an integrated approach would include interventions that impact indirectly on parents’ ability to promote the best interests of children (e.g. taxation and benefits, adequate housing, working hours) as well as those that have more immediate consequences (e.g. perinatal health services for mother and baby, parent education, home visitors).”⁹ Following its latest review of Ireland’s implementation of the International Covenant on Economic, Social and Cultural Rights, the UN Committee on Economic, Social and Cultural Rights (CESCR) expressed concern about the unintended discriminatory effects on single-parent families in the enjoyment of parental leave and recommended that the State party review existing parental leave schemes with a view to ensuring equitable and adequate parental leave benefits, in terms of both length and payments, and ensuring that they apply equally for children in single-parent families.¹⁰

The Government’s First Five Strategy 2019-2028 notes that paid parental leave is associated with better maternal and child health. The strategy sets out aims around parental leave in order to ensure children can spend more time with their parents, especially in the first year.¹¹ Children in one-parent families are not reflected in the strategy, with no specific reference being made to ensuring that such children can benefit from equal amounts of time in the care of their parent in their first year.

While Government policy is silent on this issue, the Oireachtas Joint Committee on Children, Disability, Equality and Integration has recommended that one parent families should be given double the amount of statutory parent’s leave.¹² In addition, the report of the Citizens’ Assembly On Gender Equality also recommended that single parents should be provided with the same total leave period as a couple.¹³

The [EU Work-Life Balance Directive](#), which Ireland’s parental leave entitlements are based on, does not include provisions specific to one parent families, but it states that Member States should assess whether conditions of access and detailed arrangements for parental leave should be adapted to the specific needs of parents in particularly disadvantaged situations and encourages Member States to assess whether conditions for access to exercising the right to paternity leave, carers’ leave and

⁸ UN Committee on the Rights of the Child (2005), [General Comment No. 7, Implementing child rights in early childhood](#), CRC/C/GC/7/Rev.1, para. 20.

⁹ Ibid, para 20(a).

¹⁰ Committee on Economic, Social and Cultural Rights (2024), [Concluding observations on the fourth periodic report of Ireland](#)* E/C.12/IRL/CO/4, paras, 36-37.

¹¹ Government of Ireland (2018), [First Five - A Whole-of-Government Strategy for Babies, Young Children and their Families 2019-2028](#), p.13 and p.36.

¹² Joint Committee on Children, Disability, Equality and Integration (2021) [Report on pre-legislative scrutiny of the General Scheme of the Parents’ Leave and Benefit \(Amendment\) Bill 2020](#), pp.24-26.

¹³ The Citizens Assembly (2021), [Report of the Citizens’ Assembly on Gender Equality](#), p.61.

flexible working arrangements should be adapted to particular needs, such as those of single parents.

Young Ireland, the National Policy Framework for Children and Young People 2023-2027 (Young Ireland) defines family-friendly working as “employment which supports workers to meet their family commitments, and enjoy family life to the greatest possible extent”.¹⁴ We are of the view that children as well as their parents need to be considered when developing family friendly working policies. Though we recognise that parental leave provisions are grounded in the EU Work Life Balance Directive, with non-transferability of leave based on the need to incentivise more fathers to take available leave, the children of one-parent families (the majority of which are headed by women) are being disadvantaged under the current framework as they can only benefit from their lone parent’s entitlement of 26 weeks’ parental leave per child whereas a child in a two parent family can benefit from their parent’s joint parental leave entitlements of 52 weeks per child. This disadvantage also extends to paid parent’s leave which entitles parent’s to 9 weeks paid leave in the first two years of their child’s life, although in this case, a surviving parent can avail of their partners remaining leave if their partner dies.¹⁵

The OCO recommends that the new Strategy contain outcomes and aims to increase parental leave entitlements for one-parent families so the children of these families can access the same benefit from this leave as children in two parent families.

Leadership

Objective four of the previous Strategy looks to advance women in leadership at all levels and states that the “priority will be to advance women’s leadership in a wide range of areas – in politics, State boards, corporate boards, the civil service, diplomacy, local communities, the youth sector and in sport” with the aim “to ensure women’s full and effective participation in, and equal opportunities for, leadership, at all levels”. The OCO notes that this objective is adult focused and does not contain any reference to girls aged under 18.

In its General Comment on the Rights of the Child during Adolescence, the UN Committee on the Rights of the Child stated that “Investment should also be made in strategies that promote positive gender relations and social norms; address sexual and gender-based violence, including within schools; and promote positive role models, family support and the economic empowerment of women, to overcome the legal, political, cultural, economic and social barriers that represent barriers for girls”.¹⁶ We acknowledge that the outcomes and aims included under Objective 4 in the previous Strategy are focused at areas where children and young people may not traditionally be involved. However, there are many opportunities for girls to be involved in leadership and to develop leadership skills that could be of benefit in later years in age appropriate ways. For example, girls can be encouraged or provided with opportunities to seek leadership positions in school councils and committees or in youth sports clubs. An example of one such existing project which provides leadership opportunities to young people is the [Dermot Earley Youth Leadership Initiative](#), a partnership between the GAA, Foróige, and the University of Galway.

¹⁴ DCEDIY (2023), [Young Ireland, the National Policy Framework for Children and Young People 2023-2027](#), pp.112-113

¹⁵ Citizens Information (2024) [Parent’s Leave](#)

¹⁶ UN Committee on the Rights of the Child (2016) [General Comment No. 20 on the implementation of the rights of the child during adolescence](#), CRC/C/GC/20, p.18

The OCO recommends that the new Strategy contain outcomes and aims to advance leadership opportunities for girls aged under 18.

4. Health

International Standards

Article 24 of the UNCRC requires States to recognise the right of the child to the enjoyment of the highest attainable standard of health and to facilities for the treatment of illness and rehabilitation of health. In its General Comment on the right of the child to the highest attainable standard of health, the UN Committee on the Rights of the Child interprets children's right to health as an inclusive right, extending not only to timely and appropriate prevention, health promotion, curative, rehabilitative and palliative services, but also to a right to grow and develop to their full potential and live in conditions that enable them to attain the highest standard of health through the implementation of programmes that address the underlying determinants of health.¹⁷

Of relevance to this submission is the UN Committee on the Rights of the Child's comments on gender based discrimination in relation to healthcare, including that attention should be given to the differing needs of girls and boys, and the impact of gender-related social norms and values on the health and development of boys and girls; and that attention also needs to be given to harmful gender-based practices and norms of behaviour that are ingrained in traditions and customs and undermine the right to health of girls and boys.¹⁸

The UN Committee on the Rights of the Child has also stated that all policies and programmes affecting children's health should be grounded in a broad approach to gender equality that ensures young women's full political participation; social and economic empowerment; recognition of equal rights related to sexual and reproductive health; and equal access to information, education, justice and security, including the elimination of all forms of sexual and gender-based violence.¹⁹

The OCO recommends that the new Strategy promotes gender equality in access to healthcare and mental healthcare, with particular attention given to the specific rights of girls aged 17 and under.

Target areas for the successor Strategy

Sexual health and wellbeing

The OCO welcomes a number of developments in this area over the last number of years including:

- The enactment of the Health (Regulation of Termination of Pregnancy) Act 2018; and
- the content of the new Junior Cycle and the draft Senior Cycle SPHE Curricula as it relates to sexual and reproductive health.

We also welcome the enactment of the Health (Miscellaneous Provisions) (No. 2) Act 2022 which provides that the HSE shall make available without charge contraception services for women who are ordinarily resident in the State who are aged between 17 and 25. In September 2022, the Government announced that free contraception will be available for all women and girls aged

¹⁷ UN Committee on the Rights of the Child (2013) [General comment No. 15 on the right of the child to the enjoyment of the highest attainable standard of health](#), CRC/C/GC/15, para. 2.

¹⁸ *ibid*, para. 9.

¹⁹ *ibid*, para. 10.

between 16 and 30 as part of measures included in Budget 2023.²⁰ However, while this scheme has been expanded a number of times and, as of September 2024, provides free contraception to women aged between 17 and 35 years, it has not been extended to girls younger than 17.

There is a large volume of international children's rights standards and guidance relevant to the sexual health and wellbeing of girls, which emphasise that adolescents²¹ should have access to comprehensive reproductive health services, including contraception. In its concluding observations following its most recent examination of Ireland's children's rights record, the UN Committee on the Rights of the Child recommended that the Irish State:

- Ensure the access of adolescent girls to age-appropriate reproductive health services, including free and safe abortion and post-abortion services;
- Integrate comprehensive, age-appropriate and evidence-based education on sexual and reproductive health into mandatory school curricula at all levels of education and into teacher training, and ensure that it includes education on gender equality, sexual diversity, sexual and reproductive health rights, responsible sexual behaviour and violence prevention; and
- Strengthen measures to provide adolescents with access to information on family planning and modern contraception, and ensure that relevant professionals receive appropriate training on adolescents' right to sexual and reproductive health-care services.²²

The UN Committee on the Rights of the Child provides the following guidance relevant to access to contraception in its general comments:

- States should adopt comprehensive gender and sexuality-sensitive sexual and reproductive health policies for adolescents.²³
- All adolescents should have access to free, confidential, adolescent-responsive and non-discriminatory sexual and reproductive health services, information and education, including on contraception, including emergency contraception.²⁴ There should be no barriers to commodities, information and counselling on sexual and reproductive health and rights, such as requirements for third-party consent or authorisation.²⁵
- Short-term contraceptive methods such as condoms, hormonal methods and emergency contraception should be made easily and readily available to sexually active adolescents. Long-term and permanent contraceptive methods should also be provided.²⁶

²⁰ Department of Public Expenditure and Reform and Department of Finance, [Your guide to Budget 2023](#), 27 September 2022.

²¹ In paragraph 3 of its [general comment No. 20 \(2016\) on the implementation of the rights of the child during adolescence](#), the Committee on the Rights of the Child notes that adolescence is hard to define for a number of factors, including due to children maturing at different ages, reaching puberty at different ages, and a wide variation in cultural expectations of adolescents. However, for the purpose of the General Comment, the Committee does not seek to define adolescence, but instead focuses on the period of childhood from 10 years until the 18th birthday.

²² UN Committee on the Rights of the Child (2023), [Concluding observations on the combined fifth and sixth periodic reports of Ireland](#), CRC/C/IRL/CO/5-6, para. 33.

²³ UN Committee on the Rights of the Child (2016), [General comment No. 20 \(2016\) on the implementation of the rights of the child during adolescence](#), CRC/C/GC/20, para. 59.

²⁴ *Ibid.*

²⁵ *Ibid.*, para. 60.

²⁶ UN Committee on the Rights of the Child (2013), [General comment No. 15 \(2013\) on the right of the child to the enjoyment of the highest attainable standard of health](#) (art. 24), CRC/C/GC/15, para. 69.

- Age-appropriate, comprehensive and inclusive sexual and reproductive health education, based on scientific evidence and human rights standards and developed with adolescents, should be part of the mandatory school curriculum and reach out-of-school adolescents.²⁷
- In light of articles 3, 17 and 24, States Parties should provide adolescents with access to sexual and reproductive information, including on contraceptives. Adolescents should have access to appropriate information regardless of whether their parents or guardians consent, information should be adequate and sensitive to the particularities and specific rights of adolescents, and adolescents should be actively involved in the design and dissemination of such information.²⁸
- States parties should develop and implement programmes that provide access to sexual and reproductive health services, including contraception.²⁹

The UN Committee on the Rights of the Child has also provided guidance in relation to consent to medical treatment, including sexual health treatment in a number of General Comments.³⁰ Along with this guidance from the UN Committee on the Rights of the Child, the UN Committee on Economic, Social and Cultural Rights,³¹ the UN Committee on the Elimination of Discrimination Against Women,³² the Commissioner for Human Rights,³³ and the European Network of Ombudspersons for Children³⁴ have also outlined advice and guidance in relation to access to sexual and reproductive healthcare, to necessary medications including contraception and to education on sexual and reproductive health.

A report by the Economic and Social Research Institute (ESRI), *Talking about sex and sexual behaviour of young people in Ireland*,³⁵ (2020) found that:

- At age 17, 33% (1,792) of young people reported having had sexual intercourse.
- Nearly 90% of young people who had had sexual intercourse reported using contraception when first having sex.
- Those sourcing most of their information on sex from their friends were significantly less likely to report having used contraception when they first had sex.
- For those sexually active, just under 80% reported always using contraception, with 56% reporting using a condom all the time.

²⁷ UN Committee on the Rights of the Child (2016), [General comment No. 20 \(2016\) on the implementation of the rights of the child during adolescence](#), CRC/C/GC/20, para. 61.

²⁸ UN Committee on the Rights of the Child (2003), [General Comment No. 4 \(2003\) Adolescent health and development in the context of the Convention on the Rights of the Child](#), CRC/GC/2003/4, para. 28.

²⁹ Ibid. para. 31.

³⁰ UN Committee on the Rights of the Child (2016), [General comment No. 20 \(2016\) on the implementation of the rights of the child during adolescence](#), CRC/C/GC/20, para. 39; UN Committee on the Rights of the Child (2003), [General Comment No. 4 \(2003\) Adolescent health and development in the context of the Convention on the Rights of the Child](#), CRC/GC/2003/4, para. 9 and paras 32-33, UN Committee on the Rights of the Child (2009), [General Comment No. 12 \(2009\) The right of the child to be heard](#), CRC/C/GC/12, paras. 101- 102.

³¹ UN Committee on the Rights of Economic, Social and Cultural Rights (2000), [General Comment No. 14 \(2000\) The right to the highest attainable standard of health](#) (article 12 of the International Covenant on Economic, Social and Cultural Rights), E/C.12/2000/4, para. 23 and UN Committee on the Rights of Economic, Social and Cultural Rights (2016), [General Comment No. 22 \(2016\) on the right to sexual and reproductive health](#) (article 12 of the International Covenant on Economic, Social and Cultural Rights), E/C.12/GC/22, paras. 11, 13, 18, 28 and 45

³² UN Committee on the Elimination of Discrimination Against Women (1999), [General recommendation No. 24: Article 12 of the Convention \(women and health\)](#), A/54/38/Rev.1, paras. 18, 29, 31(b) and 31(c).

³³ Council of Europe Commissioner for Human Rights (2017), [Women's sexual and reproductive health and rights in Europe](#), pp. 9-11.

³⁴ European Network of Ombudspersons for Children (2017), [Position Statement on a "Comprehensive Relationship and Sexuality Education: The right of children to be informed"](#), pp. 3-4.

³⁵ A. Nolan and E. Smyth (2020), [Talking about sex and sexual behaviour of young people in Ireland](#).

A discussion paper on Period Poverty, published by the Period Poverty Sub-Committee of the National Strategy for Women and Girls Strategy Committee in 2021, noted that the burden of cost associated with managing routine reproductive biology often falls disproportionately on women.³⁶ This includes both the expense associated with periods and the cost of hormonal and long-term contraception, which are often used to ameliorate the pain and other symptoms associated with periods, in addition to their primary function.³⁷

We are also concerned about the lack of clarity around consent to medical treatment for girls seeking contraceptive healthcare. The relevant children's rights standards and guidance outlined above does not place any age limit on the right of children to access necessary healthcare. The Children's Rights Alliance has noted that children aged 16 and over can discuss contraception with their GP without their parent/guardian's consent or knowledge, and while some doctors will prescribe contraceptives to young people under 17, others will refuse.³⁸ The Law Reform Commission has noted that health care professionals are caught in a legal vacuum because the age of consent in criminal law for sexual intercourse is 17 years,³⁹ and that any scheme to regulate children's access to contraceptive treatment must seek to occupy a middle ground position, which does not condone early sexual activity whilst ensuring that young people have access to necessary medical treatment.⁴⁰

As outlined above, adolescents have a right to evidence-based information on all aspects of sexual and reproductive health, including contraceptives, and this information should not be limited or influenced by those imparting the information – for example by the patron bodies of religious schools. Children have a right to the highest attainable standard of health and the relevant children's rights standards and guidance available on this right do not place any age limit on when children can or cannot access this right.

In light of the above, the OCO recommends that the new Strategy should contain outcomes and actions that will lead to:

- **the development of an updated Senior Cycle SPHE curriculum in a timely manner, with a focus on young people's right to sexual and reproductive health information;**
- **the ongoing review and updating of relationship and sexuality education materials to ensure the ongoing provision of rights based and inclusive information to children and young people;**
- **full implementation of the recommendations of the Period Poverty Discussion paper through the inter-Departmental Period Poverty Implementation Group⁴¹;**
- **the timely development of a successor strategy to the Sexual Health Strategy; and**
- **the extension of the free contraception scheme to include girls younger than 17; and**
- **clarification of the legal position of consent for medical treatment for girls aged 16 and under who are seeking contraceptive health care.**

LGBTI+ children and young people

³⁶ Government of Ireland (2021), [Period Poverty in Ireland – Discussion Paper](#), p. 29.

³⁷ *ibid.*

³⁸ Children's Rights Alliance (2019), [Know Your Rights: Your rights as a child or young person](#), p. 77.

³⁹ Law Reform Commission (2011), [Children and the Law: Medical Treatment](#), para. 2.50; Law Reform Commission (2009), [Consultation Paper - Children and the Law: Medical Treatment](#).

⁴⁰ Law Reform Commission (2009), [Consultation Paper - Children and the Law: Medical Treatment](#).

⁴¹ Dáil Éireann [Debate, Period Poverty](#), 17 January 2024.

The OCO submitted [observations to the consultation on the development of the new LGBTI+ National Inclusion Strategy](#) in July 2024. This submission outlines the relevant children’s rights standards to be considered when developing a new LGBTI+ National Inclusion Strategy along with our recommendations on specific priority actions:

- Gender recognition
- Timely access to transgender healthcare services
- Inclusivity in Schools
- Safeguarding Mental Health
- Combatting Hate Crimes
- Intersex children

We recommend that this submission be considered as part of this consultation as it contains detailed information on the relevant children’s rights that should be considered when developing outcomes and actions for the new National Strategy for Women and Girls.

In light of the above, and in conjunction with our submission in response to the consultation on the development of the new LGBTI+ National Inclusion Strategy, the OCO recommends that the new Strategy should contain outcomes and actions that will lead to:

- **revising the Gender Recognition Act 2015, including providing for a less onerous process for children aged 16 and 17, and for children under 16 to have access to a process of gender recognition on foot of the completed research and in line with children’s rights;**
- **the establishment of multidisciplinary health services and supports within the State for transgender children and children who are questioning their identity;**
- **prioritisation of the safety and inclusion of LGBTI+ children in the school environment and curriculum;**
- **broadening of the curriculum to comprehensively address sexual orientation and gender identity topics beyond current SPHE classes;**
- **the placement of a specific focus on the mental health needs of LGBTI+ children and young people;**
- **the development of strong policy responses to combat the negative impacts of hate crimes on LGBTI+ children; and**
- **prevent unnecessary and irreversible surgical procedures performed on intersex children, ensure associated guidelines for professionals, and provide supports for intersex children, in line with international human rights standards.**

Right to play

Article 31 of the UNCRC requires States to recognise the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts. The OCO is concerned at the available evidence which suggests that participation in physical activity plummets during adolescence with just 7% of girls age 14-15 years meeting recommended physical activity levels.⁴²

⁴² Sport Ireland (2023), [Adolescent Girls Get Active](#), p.3.

In its most recent concluding observations, the UN Committee on the Rights of the Child recommended that Ireland:

- a) Strengthen support for initiatives aimed at promoting children’s right to leisure, play, recreational activities, cultural life and the arts, including the sports action plan, the national network of sports inclusion disability officers and the creative youth plan;
- b) Ensure that such activities are available and accessible for girls, children with disabilities, asylum-seeking and migrant children and socioeconomically disadvantaged children;
- c) Fully involve children in planning, designing and monitoring the implementation of relevant policies and programmes.

The OCO welcomes Action 24 of Young Ireland which requires the Department of Health to publish a successor National Physical Activity Action Plan in 2024.⁴³ However, research conducted by Sports Ireland has identified a number of barriers facing girls in accessing and participating physical exercise. The barriers identified can be different for girls living in rural and urban areas and can include availability of activities and transport along with psychological and social barriers. Research has also suggested that formal school uniforms may have a negative impact on children’s physical activity in school.⁴⁴

The OCO recommends that the new Strategy contain outcomes and aims to support girls to continue their engagement with, and enjoyment of, physical activity as they enter and progress through adolescence.

Smoking and Vaping

The Irish Health Behaviour in School-aged Children (HBSC) Study 2022 shows that girls are more likely to use e-cigs than boys with 15% of boys and 21% of girls reporting that they have ever used electronic cigarettes.⁴⁵ In its 2023 concluding observations, the UN Committee on the Rights of the Child recommended that measures be taken by Ireland to strengthen measures to prevent and address the incidence of drug, alcohol and tobacco use by children and adolescents, including by providing them with accurate and objective information on the harmful effects of alcohol, drug and substance abuse, as well as education on preventing substance abuse.⁴⁶

The OCO welcomes Section 28 of the Public Health (Tobacco Products and Nicotine Inhaling Products) Act which prohibits the sale of nicotine inhaling products to persons under 18. The OCO also welcomes the other provisions contained in the Act aimed at limiting children’s exposure to, and opportunities to purchase, vaping products. However, the OCO is of the view that further steps are needed to limit access to these products and supports the development of regulations that prevent access to nicotine inhaling products to all children aged under 18 in order to protect their right to the highest attainable standard of health.

We believe that regulations around the availability of, and exposure to, vaping products should, at a minimum, be on par with those around the availability of and exposure to tobacco products, and, where it is possible to do so, consideration should be given to regulations that provide stronger

⁴³ DCEDIY (2023), [Young Ireland, the National Policy Framework for Children and Young People 2023-2027](#), p. 70.

⁴⁴ RTE Brainstorm (2024), [Do school uniforms lead to children getting less exercise?](#) and BBC News (2024) [Cambridge study says school uniforms may impede child activity](#).

⁴⁵ Department of Health and University of Galway (2024), [Irish Health Behaviour in School-aged Children \(HBSC\) Study 2022](#), p.35.

⁴⁶ UN Committee on the Rights of the Child (2023), [Concluding observations on the combined fifth and sixth periodic reports of Ireland](#), CRC/C/IRL/CO/5-6, para. 33.

safeguards for children and young people around access to and advertising of both tobacco and nicotine inhaling products.

In light of the above, the OCO recommends that the new Strategy should contain outcomes and actions that will lead to:

- **increased evidence informed education on the health impacts of smoking and vaping; and**
- **a reduction the availability and attractiveness of nicotine inhaling products for children and young people.**

Surrogacy

In May 2022, the OCO published a [submission on the provisions of the Health \(Assisted Human Reproduction\) Bill 2022](#) relating to surrogacy along with [follow-up observations](#) in May 2024. These detailed submissions outline the relevant children's rights standards to be considered when legislating for surrogacy along with our concerns and recommendations in relation to the draft legislation.

In its concluding observations following its most recent examination of Ireland's children's rights record, the UN Committee on the Rights of the Child recommended that the State must ensure that all children, including those born through assisted reproduction technologies (including surrogacy), have access to information about their origins, including by revising the Birth Information and Tracing Act, the Children and Family Relationships Act 2015 and the Health (Assisted Human Reproduction) Bill.⁴⁷

The OCO welcomes the enactment of the Health (Assisted Human Reproduction) Act 2024. However, we have a number of concerns with the regulatory framework as it currently stands. We therefore recommend that our previous submissions on Health (Assisted Human Reproduction) Bill 2022 be considered as part of this consultation as they contain detailed information on the relevant children's rights that have yet to be fully incorporated into the Health (Assisted Human Reproduction) Act 2024.

In short, these relate to the best interests of the child and the post-birth framework, the criminalisation of non-permitted surrogacy, access to information on origins and timeline of commencement.

In light of the above, and in conjunction with our previous submissions on this topic, the OCO recommends that the new Strategy should contain outcomes and actions that will lead to:

- **Full incorporation of the principle of the best interests of the child principle into the 2024 Act;**
- **provision for children under 16 to access identity information;**
- **consideration of the adverse impacts of the post birth framework included in the 2024 Act;**
and
- **establishment of a pre-birth framework of legal parentage in domestic surrogacy cases.**

⁴⁷ UN Committee on the Rights of the Child (2023), [Concluding observations on the combined fifth and sixth periodic reports of Ireland](#), CRC/C/IRL/CO/5-6, para. 20.

5. Child Protection and Safety

A new national strategy for women and girls must prioritise strong measures to combat violence and harm. The UNCRC affirms children's right to protection from all forms of violence. Despite progress, girls in Ireland still face high rates of sexual abuse, domestic violence, and other harm. Addressing these issues is crucial to ensuring girls can lead safe, fulfilling lives. Ireland must implement strategies to prevent violence, support survivors, and hold perpetrators accountable. Article 19 of the UNCRC requires states to take all necessary measures to protect children from violence, including psychological harm and exploitation, and calls for a holistic approach to child protection.⁴⁸

International standards

International guidelines underscore the imperative of protecting girls from violence. In its recent concluding observations regarding Ireland's children's rights record, the UN Committee on the Rights of the Child expressed deep concern over the high prevalence of violence against children, including sexual exploitation, online violence, and bullying. It further noted the low rates of reporting, prosecution, and conviction in such cases, as well as insufficient measures to prevent secondary victimisation.⁴⁹

The Committee also recommended that the Irish government revise the national strategy on domestic, sexual, and gender-based violence, amend the Domestic Violence Act to better protect children, and investigate all cases of violence against children while enhancing prevention measures. It called for stringent action against online exploitation, providing child-friendly, multi-sectoral remedies for victims, and accepting audio-visual recordings of child victim testimonies as evidence. The Committee emphasised implementing the new bullying action plan with a focus on prevention and intervention and training professionals to effectively identify and respond to violence.⁵⁰

Achievements of the previous Strategy

The National Strategy for Women and Girls 2017-2020 correctly prioritised the protection of women and girls from violence, which is vital for the safety and well-being of children, particularly girls. Violence against women and girls has severe consequences, including physical and psychological harm, and negatively impacts their education and overall well-being.⁵¹

The 2018 Domestic Violence Act expanded legal protections for children, recognising them as victims in their own right. This Act introduced Emergency Barring Orders and Safety Orders, designed to shield children from domestic violence, complemented by the Second National Strategy on Domestic, Sexual and Gender-Based Violence (2016-2021), which aimed at improving services for child victims.^{52,53}

⁴⁸ United Nations (1989), [Convention on the Rights of the Child](#), Article 19

⁴⁹ UN Committee on the Rights of the Child (2023), [Concluding Observations on the Sixth Periodic Report of Ireland](#), CRC/C/IRL/CO/6, para. 32

⁵⁰ Ibid., paras. 33-35.

⁵¹ Department of Justice and Equality (2017), [National Strategy for Women and Girls 2017-2020](#)

⁵² Department of Justice and Equality (2018), [Domestic Violence Act 2018](#)

⁵³ Department of Justice and Equality (2016), [Second National Strategy on Domestic, Sexual and Gender-Based Violence \(2016-2021\)](#)

The Criminal Law (Sexual Offences) Act 2017 enhanced protections for young victims, aiming to reduce trauma during legal proceedings.⁵⁴ Additionally, the ratification of the Istanbul Convention in 2019 set comprehensive standards for preventing violence against women, including strengthened protections for children who are indirect victims of domestic violence. Public awareness campaigns, such as the annual #WhatWouldYouDo initiative, have played a crucial role in educating the public about domestic and sexual violence, providing resources for victims, and fostering a more supportive environment for young girls and women.⁵⁵

However, serious concerns remain, as noted by the Committee on the Rights of the Child, such as the high prevalence of violence against children, including sexual exploitation, online violence and bullying, coupled with low rates of reporting and prosecution.

Target areas for successor Strategy

Protection from Violence and Abuse

The National Strategy for Women and Girls (2017-2020) initiated crucial reforms aimed at protecting women and girls from violence, including the ratification of the Istanbul Convention in 2019, which established comprehensive standards for preventing violence against women and enhancing the safety of children indirectly affected by domestic violence.⁵⁶ Although the second national Domestic, Sexual, and Gender-Based Violence (DSGBV) Strategy offered limited recognition of children, primarily viewing them as witnesses, the third DSGBV Strategy seeks to rectify this by explicitly acknowledging children and young people as both witnesses and victims/survivors.⁵⁷ This focus aligns with the principles of the UNCRC and the Istanbul Convention, both emphasising the necessity of child protection.⁵⁸ Furthermore, The lack of political will in implementing Operation Encompass, the early intervention mechanism for children experiencing domestic abuse, is preventing children from accessing instant support when they most need it. A recommendation that the mechanism be considered for implementation in the Third National Strategy for DSGBV appears to have fallen off the political agenda.⁵⁹ Notably, in its latest concluding observations, the UN Committee on the Rights of the Child urged Ireland to revise its national strategy on domestic, sexual, and gender-based violence to ensure more comprehensive protection for children.⁶⁰ To effectively safeguard children, the new national strategy must ensure the full implementation of the Third National DSGBV Strategy, particularly for children in vulnerable situations, as outlined in Article 39 of the UNCRC.⁶¹ This comprehensive approach is vital for addressing the multifaceted nature of harm that children may face and for securing their safety and well-being.

The OCO recommends that the new Strategy clearly address the specific needs of children affected by domestic, sexual, and gender-based violence, ensuring they are recognised as both victims and

⁵⁴ Department of Justice and Equality (2017), [Criminal Law \(Sexual Offences\) Act 2017](#)

⁵⁵ Department of Justice (31 March 2022). [DSGBV Strategies](#).

⁵⁶ Department of Justice. (1 Nov 2023). [Minister Flanagan announces entering into force of Istanbul Convention](#). Dublin.

⁵⁷ Department of Justice. (2022). [Third National Strategy on Domestic, Sexual and Gender-Based Violence](#). Dublin. p.20

⁵⁸ [Istanbul Convention on Preventing and Combating Violence against Women and Domestic Violence](#) (2011). Council of Europe Treaty Series, No. 210

⁵⁹ Department of Justice (2024). [Zero Tolerance Third National Strategy on Domestic, Sexual and Gender Based Violence 2024 Implementation Plan](#). p. 23

⁶⁰ UN Committee on the Rights of the Child, [Concluding Observations on the Sixth Periodic Report of Ireland](#), CRC/C/IRL/CO/6, para. 24

⁶¹ United Nations, [Convention on the Rights of the Child](#), (1989), Article 39

witnesses. This should include outcomes and actions that will lead to targeted provisions for vulnerable children, access to appropriate services, and robust monitoring to ensure effective implementation in line with child protection standards.

Domestic violence

The [Domestic Violence Act 2018](#) introduced significant provisions aimed at safeguarding children from domestic violence, notably requiring courts to consider children's views in decisions regarding domestic violence orders and allowing their inclusion in protection orders that restrict an abuser's contact.⁶² However, the Act does not adequately address the rights of children as direct victims, as they cannot independently apply for protective orders and must rely on the Child and Family Agency for advocacy. This reliance undermines their autonomy and exposes them to vulnerability, preventing meaningful participation in decisions affecting their safety. Furthermore, the current court system is characterised by delays and a lack of specialised support, often re-traumatising children and neglecting to prioritise their voices.⁶³ Although the [Third National Strategy \(2022-2026\)](#) recognises children as victims of domestic violence, it has yet to implement crucial legal reforms that would empower children to seek protective orders autonomously. Therefore, urgent reform is needed to align legal frameworks with children's rights, ensuring both legal and emotional support for young victims of domestic violence. Notably, in its latest concluding observations, the Committee on the Rights of the Child recommended amending the Domestic Violence Act to better safeguard children and ensure prompt investigations into cases of domestic violence.⁶⁴

The OCO recommends that the new Strategy contain outcomes and aims which lead to amending the Domestic Violence Act to allow children to apply for protective orders independently and receive specialised support within the court system. These changes are vital to ensure children's autonomy, protect their rights, and provide necessary legal and emotional support.

Female Genital Mutilation

Urgent measures are needed to protect girls in Ireland from the harmful and illegal practice of female genital mutilation (FGM), which infringes upon their fundamental rights to bodily integrity, health, and freedom from violence. Despite being prohibited under the [Criminal Justice \(Female Genital Mutilation\) Act 2012](#), an estimated 1,632 girls remain at risk.⁶⁵ To better safeguard these children, child-centred prevention strategies should be implemented, including mandatory FGM training for all professionals working with children, such as healthcare providers, teachers, and social workers. Additionally, public awareness campaigns should educate families and communities about the dangers of FGM, while reinforcing children's rights to safety and well-being.

The OCO recommends that the new Strategy include a national action plan aimed at preventing female genital mutilation, and continue to encourage reporting of female genital mutilation and other harmful practices to the relevant authorities.

⁶² Department of Justice and Equality (2018), [Domestic Violence Act 2018](#)

⁶³ Child Law Reporting Project (2021). [Ripe for Reform: An Analytical Review of Three Years of Court Reporting on Child Care Proceedings](#). Dublin: Child Law Reporting Project.

⁶⁴ Committee on the Rights of the Child. (2023). [Concluding observations on the fifth periodic report of Ireland](#). CRC/C/IRL/CO/5. para. 24(b)

⁶⁵ Irish Examiner (10 June 2024). [Up to 5,790 women and girls in Ireland have suffered 'hidden' abuse of female genital mutilation](#).

Data collection

Accurate and comprehensive data collection is crucial in developing effective strategies to protect children, particularly girls, from domestic and gender-based violence. By identifying specific risks and vulnerabilities, data enables the creation of targeted interventions that address the unique needs of children, ensuring their safety and well-being. Moreover, it allows for ongoing monitoring and evaluation, ensuring interventions remain effective and responsive. Prioritising data collection upholds children's rights to live free from violence and harm, as enshrined in the UNCRC, and contributes to building a safer, more equitable society.

The OCO recommends that any new Strategy should contain outcomes and actions that will lead to comprehensive data collection to identify risks and enable targeted interventions, ensuring effective protection for children from domestic and gender-based violence and upholding their right to live free from harm.

6. Economic Security

The new strategy must prioritise economic security, which is essential not only for adults but also for the well-being and development of children. A family's economic situation significantly influences children's rights to life, survival, and development, as outlined in Article 6 of the UNCRC. Economic inequality limits children's access to essential resources such as education, healthcare, nutritious food, and safe housing, hindering their growth and potential. In Ireland, one-parent families, particularly those headed by women, face higher rates of poverty and economic insecurity, which directly impact their children's futures.⁶⁶

Target areas for successor Strategy

Support for Parents

Article 18 of the UNCRC emphasises the shared responsibility of both parents and the state in the upbringing and development of the child.⁶⁷ It mandates that states must provide appropriate assistance to parents and legal guardians in the performance of their child-rearing responsibilities. Furthermore, Article 27 calls upon states to take appropriate measures to assist parents in securing the conditions necessary for the child's development, particularly through the provision of material assistance and support programs.⁶⁸

The Committee on the Rights of the Child, in its concluding observations on the combined fifth and sixth periodic reports of Ireland, called for increased availability of affordable childcare options for working parents, particularly for those in disadvantaged situations, including by significantly increasing the resources allocated to childcare and transitioning towards a publicly funded model of childcare.⁶⁹ It further called for expanding school meal programs to address food insecurity.⁷⁰ Further, the Committee on Economic, Social and Cultural Rights, in its concluding observations on the fourth periodic report of Ireland, recommended establishing a social protection floor to provide

⁶⁶ Children's Rights Alliance (2024). [Child Poverty Monitor 2024](#). p.5

⁶⁷ United Nations. (1989). [Convention on the Rights of the Child](#). Article 18

⁶⁸ Ibid, Article 27

⁶⁹ Committee on the Rights of the Child. (2024). [Concluding observations on the combined fifth and sixth periodic reports of Ireland](#). para. 26(d)

⁷⁰ Ibid, para 35(a)

financial stability for families,⁷¹ adopting a national action plan to eradicate poverty⁷² and increasing social benefits to keep up with the cost of living.⁷³

Since 2017, Ireland has made notable progress under the previous Strategy in supporting families and working parents. Initiatives like Supporting Parents⁷⁴ have enhanced access to parenting services, proposals to expand paid leave have increased entitlements for both mothers and fathers,⁷⁵ and the National Childcare Scheme (NCS) has made childcare more affordable.⁷⁶ However, significant challenges remain. Childcare costs in Ireland remain prohibitively high, with Ireland ranking among the highest in the OECD for childcare expenses. This puts many families, especially lone parents, in a difficult position, with around 60% of lone parents unable to afford childcare.⁷⁷ While the NCS provides subsidies to alleviate these costs, it reaches only 9% of children under 15, leaving many families, particularly those from disadvantaged backgrounds, unable to access the support they need.⁷⁸ In addition to financial barriers, non-financial obstacles also hinder access. Vulnerable households, including those from the Traveller community or with low digital literacy, often struggle to navigate the NCS application process. For lone parents, the need for stronger economic support is particularly pressing. With high housing and childcare costs, it's notable that 75% of homeless families are headed by lone parents.⁷⁹ Adequate economic support is essential to ensure that children can enjoy a standard of living that fosters their physical, mental, and social development, in line with their rights.

The OCO recommends that the successor Strategy prioritises policies that ensure all children, regardless of family structure or socio-economic background, have access to high-quality childcare and support services, in line with the EU child guarantee's call for free access to Early Learning and Childcare (ELC). This includes addressing both financial barriers, such as the high cost of childcare, availability of childcare places in local areas and non-financial obstacles, like application difficulties.

Employment and Training

Article 18 of the UNCRC emphasises the need for states to support parents in their child-rearing responsibilities, which includes providing access to employment and training opportunities.⁸⁰ Similarly, Article 6 of the International Covenant on Economic, Social and Cultural Rights recognises the right to work and obliges states to take appropriate steps to achieve the full realisation of this right, including technical and vocational guidance and training programs.⁸¹

⁷¹ Committee on Economic, Social and Cultural Rights, [Concluding Observations on the sixth periodic report of Ireland](#) (2023), para. 35(a)

⁷² Ibid, para 39(a)

⁷³ Ibid, para 35(a)

⁷⁴ Department of Children, Equality, Disability, Integration and Youth (27 April 2022). [Minister for Children launches Supporting Parents, a national model of parenting support services.](#)

⁷⁵ RTÉ News, [Parent's Leave and Parent's Benefit extended from today](#) (1 August 2024).

⁷⁶ Department of Children, Equality, Disability, Integration and Youth (29 August 2024). [Thousands of families to benefit from substantial reductions in early learning and childcare costs from 2 September](#)

⁷⁷ Society of St Vincent de Paul (2019). [Working, Parenting and Struggling? An analysis of the employment and living conditions of one parent families in Ireland.](#) p. 5

⁷⁸ Reilly, L., Pierce, M., Norris, M., & Foley, L. (2023). [European Child Guarantee: Analysing the extent to which children in Ireland have access to key services.](#) UCD Geary Institute for Public Policy.

⁷⁹ Barnardos. (2023). [75% of families becoming homeless since eviction ban ended are headed by one parent.](#)

⁸⁰ United Nations, [Convention on the Rights of the Child](#), (1989), Article 18

⁸¹ [International Covenant on Economic, Social and Cultural Rights](#). United Nations Treaty Series 993 (1966). Article 6

While the CESCR welcomed measures such as the Gender Pay Gap Information Act 2021, it expressed concern about persistent gender pay gaps, driven by women's overrepresentation in part-time, low-paid work.⁸² It recommended that Ireland focus efforts on closing gender pay gaps by addressing segregation and removing barriers to full-time employment.⁸³ The CESCR also urged a review of employment policies to tackle high unemployment and underemployment among marginalised groups, guided by General Comment No. 18 (2005).⁸⁴ Meanwhile, the Committee on the Rights of the Child called for child rights-based budgeting⁸⁵ and increased social benefits to help families with the rising cost of living,⁸⁶ creating a more inclusive environment for children and families.

Since 2017, Ireland has improved economic support for families under the previous Strategy through initiatives like locally funded courses promoting self-development and entrepreneurship for women. Increased awareness of eligibility for Springboard+ and HCI Pillar 1 courses has strengthened economic security by providing access to reskilling and upskilling opportunities, particularly for the unemployed, self-employed, and returners to the workforce.⁸⁷ Addressing disparities is crucial to ensuring that all children benefit from improved economic security and opportunities for a better quality of life, regardless of family structure. In Ireland, one-quarter of women are classified as low-paid, with lone parents especially vulnerable due to barriers in accessing quality employment.⁸⁸ Enhancing access to training and job opportunities can empower mothers to secure higher-paying jobs, which directly improves their children's well-being. Women with young children face significant challenges when re-entering the workforce, making affordable childcare and after-school programs essential supports. By investing in education and training, particularly for women and lone parents, through adequate income supports the government can help close the pay gap and promote economic security, which is vital for children's development.

The OCO recommends that the new Strategy contain outcomes and actions that will lead to the expansion of targeted employment and training initiatives for parents, particularly women, to enhance economic security and gender equality. This should include addressing barriers such as the high cost of childcare, promoting access to vocational and technical training, and ensuring that all families, especially one parent families, benefit from these opportunities.

Poverty and Social Inclusion

Article 27 of the UNCRC ensures children's right to an adequate standard of living and Article 28 supports improved education access for marginalised groups like Traveller and Roma women.⁸⁹ Similarly, the CESCR emphasises the importance of addressing socio-economic inequalities in its

⁸² Committee on Economic, Social and Cultural Rights, [Concluding Observations on the sixth periodic report of Ireland](#) (2023), para. 24

⁸³ Ibid, para. 25(b)

⁸⁴ Ibid, para. 26

⁸⁵ Committee on the Rights of the Child. (2023). [Concluding observations on the fifth periodic report of Ireland](#). CRC/C/IRL/CO/5. para.

⁸⁶ Ibid, para. 35(a)

⁸⁷ Department of Further and Higher Education, Research, Innovation and Science (21 May 2024). [Ministers O'Donovan and Collins announce more than 11,400 free or subsidised places on college courses](#)

⁸⁸ Hingre, G., Russell, H., McGinnity, F., and Smyth, E. (2024). [Gender and labour market inclusion on the island of Ireland](#), ESRI Research Series 176, Dublin: ESRI, <https://doi.org/10.26504/rs176>

⁸⁹ [UN Convention on the Rights of the Child](#), adopted November 20, 1989, Articles 27 and 28

General Comment No. 20 on non-discrimination, stressing that measures must be taken to support marginalised and vulnerable groups, including children.⁹⁰

In its recommendations to Ireland in February 2023 the UN Committee on the Rights of the Child recommended that Ireland should ensure that measures to combat poverty comply with a child rights-based approach and include a particular focus on children from disadvantaged families, especially children of single parents, refugee children and children of ethnic minority groups.⁹¹ In its latest concluding observations, the CESCR also called on Ireland to implement a comprehensive national action plan aimed at eradicating poverty, with particular emphasis on groups most vulnerable to social exclusion, including children, single-parent families, and ethnic minorities.⁹² Taking this step is crucial for Ireland to effectively eliminate child poverty and create a more secure and supportive environment for all children.

The previous strategy made notable progress in addressing social exclusion, particularly through initiatives aimed at empowering women in disadvantaged communities, including lone parents, those in rural areas, migrant women, women with disabilities, and older women. Despite efforts, barriers like limited access to childcare, affordable housing, flexible work, and services like healthcare and education persist.

Women facing multiple forms of discrimination, such as migrants and refugees, continue to struggle with social exclusion. Under the previous strategy, the National Traveller and Roma Inclusion Strategy (NTRIS) 2017-2021 achieved advancements in education and employment, while also raising awareness of the unique challenges faced by Traveller and Roma communities. Despite this, its implementation was hampered by limited resources and poor coordination.⁹³ These are shortcomings that must be addressed in the rollout of NTRIS II. In relation to child poverty, [Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People, 2014-2020](#) set a national child-specific social target to lift over 70,000 children out of consistent poverty by 2020. This target was not achieved. While the consistent poverty rate for children dropped from 7% to 4.8% between 2022 and 2023, it must be noted that the deprivation rate increased from 18.8% to 21.4% during the same period.⁹⁴

Expanding education, employment, affordable childcare, stable housing social inclusion initiatives, and adequate income supports for women in marginalised communities in the new National Strategy for Women and Girls will be key to advancing social equity and safeguarding children's rights. With 10.6% of the Irish population at risk of poverty or social exclusion,⁹⁵ women in these groups often face compounded barriers to employment, such as discrimination and limited resources.⁹⁶ In 2023, 45.6% of one parent families were experiencing enforced deprivation compared to 14.6% of two parent families.⁹⁷ Moreover, Ireland has yet to meet its consistent

⁹⁰ UN Committee on Economic, Social and Cultural Rights. (2009). [General comment no. 20: Non-discrimination in economic, social and cultural rights](#) (art. 2, para.2 of the International Covenant on Economic, Social and Cultural Rights). 42nd sess. Geneva: United Nations.

⁹¹ UN Committee on the Rights of the Child (2023), [Concluding observations on the combined fifth and sixth periodic reports of Ireland](#), CRC/C/IRL/CO/5-6, para. 35.

⁹² Committee on Economic, Social and Cultural Rights, [Concluding Observations on the sixth periodic report of Ireland](#) (2023), para. 39(a)

⁹³ Pavee Point. (2024). National Traveller and Roma Inclusion Strategy-II: Pavee Point Overview. Retrieved from: <https://www.paveepoint.ie/wp-content/uploads/2024/08/NTRIS-II-Pavee-Point-Overview.pdf>

⁹⁴ Central Statistics Office (Ireland). (2024). [Survey on Income and Living Conditions 2023](#).

⁹⁵ Ibid

⁹⁶ Migrant Rights Centre Ireland. (2020). [Towards an Inclusive Labour Market in Ireland](#). Migrant Rights Centre Ireland. p. 2

⁹⁷ CSO (2024) [Survey of Income and Living Conditions 2023](#), Table 5.1.

poverty target, highlighting the need for further investment.⁹⁸ While Young Ireland contains commitments to reduce the number of children and young people living in poverty over the lifetime of the framework,⁹⁹ and welcome the establishment of the Child Poverty and Well-being Programme office, we are concerned at the delays in developing a new child poverty target.¹⁰⁰ Investing in these efforts not only promotes gender equality but also supports children's rights to a standard of living that fosters their development, helping break cycles of poverty.

The OCO recommends that the new Strategy include targeted measures to:

- **establish an ambitious new target for reducing consistent child poverty and do so in the context of working systematically across Government to eradicate child poverty; and**
- **ensure equitable access to employment and training opportunities for women and girls, particularly those from marginalised groups. This should involve the expansion of accessible and affordable childcare services with free access for low income families, the provision of tailored career support, and the promotion of flexible work arrangements to accommodate caregiving responsibilities.**

⁹⁸ Social Justice Ireland. (26 February 2024). [Ireland's progress towards achieving the UN SDGs - Goal 1 No Poverty 2024](#).

⁹⁹ DCEDIY (2023), [Young Ireland, the National Policy Framework for Children and Young People 2023-2027](#).

¹⁰⁰ Department of Social Protection. (2023, November 20). [National Child Poverty Target Public Consultation](#).