

## **Submission to the Department of Housing, Local Government and Heritage on the Review of the Electoral Reform Act 2022**

April 2026

### **About Women's Aid**

Women's Aid welcomes the opportunity to make a submission to the Department of Housing, Local Government and Heritage on the review of the Electoral Reform Act 2022.

Women's Aid is a leading national organisation that has been working in Ireland to stop domestic violence and abuse (DVA), against women and children since 1974. In this time, the organisation has built up a huge body of experience and expertise on the issue, enabling us to best support women and share this knowledge with other agencies responding to women and children experiencing domestic violence. More information on Women's Aid's work is available on [www.womensaid.ie](http://www.womensaid.ie).

Women's Aid welcomes the opportunity to provide a brief submission to the review of the Electoral Reform Act 2022, focusing on its impact on women experiencing domestic violence and abuse.

Domestic violence and abuse are very common in Ireland. A recent FRA-Eige reports finds that in Ireland, since age 15:

- 22.7% of women have experienced physical violence (including threats) and/or sexual violence and 33.2% psychological violence by an intimate partner<sup>1</sup>.
- 11% have experienced sexual violence by an intimate partner and 21.7% by any perpetrator<sup>2</sup>.
- 21% have experienced stalking in their lifetime, 9.2% in the past 5 years and 3.5% in the last 12 months<sup>3</sup>.

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1 FRA and EIGE, EU Gender-based Violence Survey – Evidence for Policy and Practice, Publications Office of the European Union, Luxembourg, 2026, Table 1 and Table 8, <https://fra.europa.eu/en/publication/2026/eu-gender-based-violence-survey-evidence>

2 Ibidem, Table 2.

3 Ibidem, Table 29

For many women who separate from an abusive partner in a context of DVA, it is essential that their new address remains confidential, so that the abuser cannot find them and put them and their families at risk. The same can be said for victims of stalking.

Women's Aid therefore appreciates that the Electoral Reform Act 2022, introduced in Ireland the possibility of anonymous registration for people whose safety may be at risk if their details are made public on the register.

However, we would argue that the list of 'qualified persons' who can provide a declaration that the safety of the elector (or of a member of their household) would be at risk if the published electoral register contained their name and address, is too limited. Currently it only includes (a) a member of the Garda Síochána not below the rank of superintendent, and (b) a registered medical practitioner.

It is quite striking that this list does not include staff of domestic violence services, who are very well placed to provide such declaration.

Many women do not report the abuser to the Garda<sup>4</sup> or mention the abuse to their medical practitioner. Many women survivors of coercive control may not have physical injuries. Women who are physically injured by the abuser and who access medical treatment may or may not disclose the reason for their injury.

We note that the UK provides for a much more extensive list of professionals that can be qualified persons, which includes directors of social services and children's services, registered nurses, midwives, and refuge managers, as well as medical practitioners and police of or above the rank of Inspector.<sup>5</sup>

### **Recommendation One**

Women's Aid recommends that the current list of qualified persons is expanded to include as a minimum:

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4 The 2014 European Agency for Fundamental Rights Violence Against Women Survey found that In Ireland only 28% of women indicated that the most serious incident of violence by a partner came to the attention of the Police. This includes both by women reporting themselves and third-party reporting.

<https://fra.europa.eu/en/publication/2014/violence-against-women-eu-wide-survey-main-results-report>  
Unfortunately, the 2026 FRA and EIGE report does not provide this data disaggregated by member state.

5 See Voter registration form for registering anonymously, page 7,

[https://assets.publishing.service.gov.uk/media/67fce56d4f66a92e28546631/ITR-A-E\\_Anon.pdf](https://assets.publishing.service.gov.uk/media/67fce56d4f66a92e28546631/ITR-A-E_Anon.pdf)

- Managers of any Cuan funded specialist domestic violence service.
- Senior Tusla Social workers
- Registered nurses and midwives, psychologists, and counsellors.

In relation to the use of court orders as evidence of risk, we note the lack of S28 orders, introduced in Ireland by Part 5 of the Criminal Justice (Miscellaneous Provisions) Act 2023<sup>6</sup>, which aim to protect victims of stalking. This is clearly due to the fact that these orders did not exist when the Electoral Reform Act was passed.

S28 orders for victims of stalking are similar to the orders under the Domestic Violence Act 2018 but apply regardless of the relationship between victims and stalkers, as such they are very useful when there is no intimate relationship and the Domestic Violence orders cannot apply.

Victims of staking are often very afraid that the stalker may find out their residential address, and consequently that the stalking may move from online to offline or escalate. They should therefore also be able to register as anonymous electors.

### **Recommendation Two**

Women's Aid recommends that S28 orders are included in the list of acceptable evidence for registering as anonymous elector.

Women's Aid thanks the Department for their consideration of this submission and its recommendations and would welcome the opportunity to further discuss, as necessary.

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6 S28 Criminal Justice (Miscellaneous Provisions) act 2023,  
<https://www.irishstatutebook.ie/eli/2023/act/24/enacted/en/print#sec28>