



**Outhouse LGBT Centre, 105 Capel St., Dublin D01 R290**

E: [info@ghn.ie](mailto:info@ghn.ie)

W: [www.ghn.ie](http://www.ghn.ie)

**Registered Charity Number (RCN): 20078454**

Mr. Stephen Donnelly,  
Minister of Health, / Minister of State,  
Miesian Plaza,  
50 – 58 Lower Baggot Street,  
Dublin 2.  
D02XW14.

6/09/2024

**Re: Gender Affirming Care Services in Ireland**

Dear Minister Donnelly,

I am writing on behalf of the Gay Health Network (GHN) to address the significant lack of services for transgender individuals in Ireland. Ireland consistently ranks among the worst in Europe for access to gender-affirming care, creating a substantial barrier to the health and well-being of transgender and non-binary people. We acknowledge the urgent need to improve access to appropriate healthcare for those experiencing gender dysphoria.

The UK Department for Health commissioned a review of gender care for young people (the Cass Review) which is proving influential in shaping transgender healthcare in the UK. GHN share the concerns of respected international organisations such as the World Association for Transgender Health (WPATH),<sup>1</sup> Yale Law School Review<sup>2</sup> the British Medical Association<sup>3</sup> and the Max Planck Institute for Brain Research<sup>4</sup> that the Cass review has fundamental flaws<sup>5</sup> and should not be used to shape transgender care services in Ireland. These flaws include:

- Substandard and inconsistent use of evidence.
- Non-evidenced claims.
- Unethical recommendations.
- Overt prejudice.

---

<sup>1</sup> <https://www.wpath.org/media/cms/Documents/Public%20Policies/2024/17.05.24%20Response%20Cass%20Review%20FINAL%20with%20ed%20note.pdf? t=1716075965>

<sup>2</sup> [https://law.yale.edu/sites/default/files/documents/integrity-project\\_cass-response.pdf](https://law.yale.edu/sites/default/files/documents/integrity-project_cass-response.pdf)

<sup>3</sup> <https://www.bma.org.uk/bma-media-centre/bma-to-undertake-an-evaluation-of-the-cass-review-on-gender-identity-services-for-children-and-young-people>

<sup>4</sup> <https://osf.io/preprints/socarxiv/wjafd>, author Dori Grijjseels

<sup>5</sup> Critically Appraising the Cass Report: Methodological Flaws and Unsupported Claims, Dr Chris Noone et al, available: <https://osf.io/preprints/osi/uhndk>

- Pathologisation.
- Intentional exclusion of service users and trans healthcare experts from the review process.

GHN strongly believes that access to gender-affirming care, when appropriate, is crucial for the well-being of transgender youth. Models like those in Malta, Australia and New Zealand, which prioritise psychological support, respect for bodily autonomy, individual care, and ongoing monitoring and support, serve as exemplary standards.

### **The Issues:**

- **Long Waiting Lists:** The National Gender Service (NGS) is overwhelmed, leading to wait times that can stretch for years. This forces transgender people to endure prolonged periods of gender dysphoria, negatively impacting their mental and emotional health.
- **Limited Access for Youth:** Currently, there are no public options for gender-affirming healthcare for transgender youth in Ireland. This lack of support can have devastating consequences for young people grappling with their gender identity and their families.
- **Gatekeeping Model:** The current system often relies on a "gatekeeping" approach, where access to care is contingent on diagnoses and evaluations. This can be dehumanising and dismissive of the lived experiences of transgender individuals.

### **We urge the Irish government to consider models for gender identity services that:**

- Include a comprehensive review of the current model of transgender healthcare provision. This is essential to ensure optimal patient outcomes. While the National Gender Service (NGS) has provided care, there is a clear need to explore alternative service models that better meet the specific requirements of the transgender community. This might involve integrating transgender healthcare into general practice or developing specialised, community-based care services. Prioritising patient experience and access to timely, appropriate care should be the primary focus of any reform.
- Develops a youth pathway: Creates a pathway for transgender youth to access appropriate medical and psychological support.
- Moves to an informed consent model: Implements an informed consent model for hormone therapy, allowing transgender individuals to make informed decisions about their healthcare in consultation with medical professionals.
- Provides support for GPs: Provides training and resources for General Practitioners so they can feel confident in providing this care within the informed consent model.
- Centres the voices of transgender individuals and organisations throughout the development and implementation process.
- Prioritises a holistic approach to care, incorporating mental health support, social services, and gender-affirming healthcare as optional supports on patient request, rather than unnecessary bureaucratic hurdles. Respect for patient autonomy and co-production of care can reduce conflict and improve outcomes.
- Draws inspiration from successful models like those in Malta and New Zealand, ensuring accessibility and inclusivity.

Malta has taken significant steps towards this standard of excellence. Their Gender Wellbeing Clinic offers a range of services through informed consent, including hormone therapy, mental health support, and some surgeries. The government also recognises the need for ongoing development to ensure full access to all necessary services.

### **Access and Informed Consent:**

- **Informed consent model:** Malta practices informed consent, meaning transgender individuals can access care without mandatory mental health diagnoses or real-life experience requirements.
- **Self-determination:** Respecting an individual's self-identified gender should be a core principle.
- **Accessibility:** Services should be accessible regardless of socioeconomic status or location.

### **Comprehensive Care:**

- **Mental health support:** Access to mental health professionals in a supportive capacity when requested by the patient.
- **Hormone therapy:** Safe and effective hormone therapy should be available. Support for those who self-medicate should also be provided, including blood tests, injection supplies (needles etc.), and injection training.
- **Surgical options:** Access to a variety of gender-affirming surgeries should be offered, respecting individual needs and desires.
- **Other services:** Support services like voice therapy, hair removal, and fertility preservation may also be important.

### **Respectful Environment:**

- **Training:** Healthcare providers should be trained in best practices for transgender care, including cultural competency.
- **Inclusive language:** Using respectful terminology and correct pronouns is essential.
- **Privacy:** Strict confidentiality and privacy protocols regarding a person's medical history and gender identity should be maintained.

GHN stands ready to collaborate with the Department of Health and our community partners to help develop a comprehensive and evidence-based approach to gender services that prioritises the well-being of Irish youth and transgender people. We would be grateful for the opportunity to discuss these recommendations further and explore ways to work together.

We believe that all young people, regardless of gender identity, deserve access to healthcare that prioritises both their physical and mental well-being.

Yours sincerely,

---

Professor Peter Keogh  
Gay Health Network