EU LGBTIQ Equality Strategy 2026-2030

Submission

Mental Health Reform

MHR Submission to Public Consultation on an EU LGBTIQ Equality Strategy

24th June 2025

Which of the following priorities identified in the 2020-2025 LGBTIQ equality strategy should remain a focus for EU action?

Maximum 5 selection(s)

Selected:

- ✓ Enforcing and improving legal protection against discrimination
- ✓ Combating inequality in education, health, culture and sport
- ✓ Strengthening LGBTIQ people's legal protection against hate crime, hate speech and violence
- ✓ Protecting and promoting LGBTIQ people's physical and mental health
- ✓ Improving the recognition of trans and non-binary, and intersex people

Are there new priorities which you would like EU action on LGBTIQ equality to focus on? Please explain:

The EU should prioritise introducing mandatory, age-appropriate inclusive education on gender identity and sexual orientation in all EU schools and ensuring uniform mental health access for LGBTQI+ youth. The EU should also boost research on intersectional LGBTIQ experiences to inform policy and improve access to inclusive, affirming healthcare—like gender-affirming care and intersex bodily autonomy—for genuine equality.

LGBTIQ people may experience discrimination based on the overlap of their sexual orientation, gender identity, gender expression or sex characteristics with other aspects of their identity. Which other characteristics require more focused attention in the EU's efforts to ensure LGBTIQ equality?

Maximum 5 selection(s)

Selected:

- ✓ Age,
- ✓ Disability
- ✓ Mental health challenges
- ✓ Race or ethnicity
- ✓ Neurodivergence

You may also explain your choices above:

LGBTIQ+ youth in rural areas, migrants, and neurodivergent individuals face compounded discrimination. Age affects access to support[1]; disability and neurodivergence deepen exclusion and healthcare gaps[2]. Race and ethnicity add systemic bias. High rates of self-harm and suicide, especially among trans youth[3], highlight urgent mental health needs. Focusing on these traits ensures EU efforts uplift all LGBTIQ voices, embracing their complexity.

Combating discrimination against LGBTIQ people is one of the pillars of the current LGBTIQ equality strategy. To what extent do you agree with the following statements?

*The EU should support Member States in promoting health equity for LGBTIQ people through guidance and collaboration and the exchange of best practices

*The EU should support LGBTIQ equality in education through guidance and collaboration with Member States

*The EU should support Member States' efforts to advance LGBTIQ equality in sports through guidance and collaboration

*The EU should address LGBTIQ homelessness and socio-economic inequalities

*The EU should focus on promoting a safe and inclusive working environment, including by cooperating with private organisations

*The EU should play a key role in combating bias and discrimination in AI and online

Response: Strongly Agree with all

You may also explain your choices above:

Disparities in health[4], education [5] [6], and housing[7] impact LGBTQI+ lives deeply. In addition, artificial intelligence draws from existing online data sets which often exclude or misrepresent LGBTQI+ people. As a result, it could exacerbate exisiting biases or profile LGBTIQ+ individuals. Coordinated EU action is essential, especially in tech

regulation, workplace policy, and school inclusion to prevent suicide and mental distress.

Improving LGBTIQ people's safety is another pillar of the current LGBTIQ equality strategy. To what extent do you agree with the following statements?

*The EU should play a major role in combating conversion practices

*It is important for the EU to counter intersex genital mutilation

*The EU should prioritise fighting anti-LGBTIQ online hate speech, including in partnership with digital platforms

*The EU should better support countering anti-LGBTIQ hate speech and hate crimes

*The EU should fully support the prevention of bullying (including cyberbullying) and discrimination against LGBTIQ children and young people

*The EU should help better protect LGBTIQ public and private events, including Pride marches

*The EU should further improve support for LGBTIQ victims of crime

*The EU should prioritise safeguarding the rights of LGBTIQ asylum seekers

Response: Strongly Agree with all

You may also explain your choices above:

LGBTIQ+ youth face high rates of bullying[8], and conversion practices still occur in some regions[9]. Despite a commitment to protect the rights of intersex adults and children genital mutilation continues to be carried out in Ireland and in other EU countries[10] [11]. EU-wide action could ensure legal consistency and victim support in relation to these issues.

Building more inclusive societies for LGBTIQ people is another pillar of the current LGBTIQ equality strategy. To what extent do you agree with the following statements?

*The EU should create a conducive environment for LGBTIQ civil society organisations and human rights defenders

*The EU action should focus on countering anti-LGBTIQ narratives

*The EU should play a major role in improving recognition for trans, intersex and non-binary people

*It is important for the EU to uphold the rights of rainbow families and their children

*The EU should play a major role in upholding the rights of LGBTIQ children, like all children

*The EU should challenge and raise awareness of gender stereotypes

Response: Strongly Agree with all

You may also explain your choices above:

A rise in anti-gender narratives[12] and the politicisation of queer lives [13] threaten the lives and wellbeing of transgender, intersex and non-binary people, LGBTQI+ families and children. It is vital that the EU provides clear, visible support for civil society and youth to address these threats.

Advancing LGBTIQ equality in the EU's external relations is another pillar of the current LGBTIQ equality strategy. To what extent do you agree with the following statements?

*The EU should promote LGBTIQ equality in countries that are candidate members or potential candidates for EU membership

*The EU should promote LGBTIQ equality in its neighbourhood countries

*The EU should promote LGBTIQ equality in non-EU countries

*The EU should play a major role in protecting LGBTIQ human rights defenders and supporting LGBTIQ civil society in non-EU countries

*The EU should counter the spread of anti-LGBTIQ and identity-based disinformation and information manipulation

*The EU should continue to promote the full and equal enjoyment of human rights by LGBTIQ people around the world, including through the UN and other international organisations

Response: Strongly Agree with all

You may also explain your choices above:

LGBTIQ+ rights are regressing in some regions including the USA, The UK, Georgia, Ghana, and Kazakhstan; the EU must counter global disinformation and provide asylum, funding, and legal support. The EU can exert influence over other countries to uphold the human rights of all people.

Due to existing inequalities, LGBTIQ people are more vulnerable in times of crisis, such as during the COVID-19 pandemic or Russia's war of aggression in Ukraine. How could LGBTIQ equality be better integrated into response mechanisms to pandemics and to crises in general?

It would be helpful to establish inclusive crisis protocols across health, housing, and migration systems at a national and EU-level. Specific protocols are needed to ensure LGBTIQ+ identities are not erased in emergency responses, with specific safe spaces and trauma-informed care. The Eu should mandate inclusive asylum procedures and training for officers on LGBTIQ+ rights and vulnerabilities.

Which actions do you think the Commission should prioritise in the next 5 years?

Maximum 5 selection(s)

- ✓ Improving the collection of equality data
- ✓ Running information and awareness-raising campaigns
- ✓ Training and building the capacity of professionals in various sectors (e.g. healthcare providers, law enforcement and justice professionals)
- ✓ Enforcing and monitoring existing EU anti-discrimination legislation
- ✓ Mainstreaming LGBTIQ equality across all EU policies

Into which specific EU policy areas do you think LGBTIQ equality should be better integrated?

Selected:

- ✓ Digital Policy
- ✓ Education & Training Policy
- ✓ Health Policy
- ✓ Justice and Fundamental Rights Policy
- ✓ Children's Rights and Youth Policy

You may also specify which parts of the policies chosen should consider LGBTIQ equality more:

Youth education, mental health access, justice protection, and migration fairness are some of the areas where LGBTIQ individuals remain most vulnerable. Areas of particular concern include recognition of bias-related hate crimes, lack of inclusive physical and mental health care, systemic discrimination, and equal and inclusive relationship and sex education.

Which stakeholders do you believe the Commission should work with more to advance LGBTIQ equality?

Selected: National Governments, Human rights organisations / civil society organisations, LGBTIQ rights organisations, National education and training institutions, Children's rights and youth organisations

You may also explain your choices above:

Local LGBTIQ groups and youth organisations have on-the-ground insights and should co-develop strategies with Member States and educators. Further collaboration with national governments could address the inter-country variation in the way LGBTIQ+ rights are recognised and upheld across the EU.

Do you have any additional comments or suggestions to improve LGBTIQ equality in the EU? You may use the space below and/or upload a document.

Further notes on Challenges and Recommendations

The EU should establish a permanent observatory on LGBTQI+ youth mental health and fund targeted interventions. Education, legal harmonisation, and cross-border family recognition should be enforced equally across Member States.

1. National Mental Health Crisis Among LGBTIQ Youth

- **Challenge**: Ireland's 2024 "Being LGBTQI+ in Ireland" report revealed alarming rates of depression (50%), anxiety (66%), and suicidality (77%) among LGBTQI+ youth aged 14–18[14].
- Elevated rates of suicidality among LGBT young people are observed in many EU countries [15]
- **Recommendation**:
- The **EU should fund Member State pilot programs** for trauma-informed, LGBTIQ-inclusive mental health services.
- Promote the development of **EU-wide mental health indicators for LGBTQI+ youth** to guide interventions and funding.

2. Patchy Implementation of Inclusive Education

- **Challenge**: Despite policy progress, Irish schools vary widely in the delivery of LGBTIQ-inclusive relationships and sexuality education (RSE), particularly in faith-based schools[16] [17].
- **Recommendation**:
  - Create **binding EU minimum standards for inclusive RSE** that respect national competence but require inclusion of sexual and gender diversity.
  - Encourage **training programs for educators** that reflect intersectional identities, especially for neurodiverse or migrant LGBTQI+ youth.

3. Support for Rainbow Families and Cross-Border Recognition

- **Challenge**: Same-sex families report difficulties in parental recognition when moving across EU borders[18].
- **Recommendation**:
  - Expedite adoption of the proposed **EU Parenthood Recognition Regulation**, ensuring full legal recognition for rainbow families across the Union.
  - Include **case studies and family testimonies** in implementation reviews to ensure practical impact.

4. Trans and Non-Binary Rights

- **Challenge**: Ireland's Gender Recognition Act does not fully recognise non-binary people and lacks clear pathways for under-16s.Only 2 EU countries fully recongise non-binary genders [19]
- **Recommendation**:
  - The EU should promote **best-practice guidance on gender recognition laws**, encouraging Member States to adopt **self-determination-based** systems with recognition for non-binary identities and minors (as in Malta or Germany).
  - Fund **trans-led civil society organisations** to participate in policy design.

5. Combatting Rural Isolation and Online Hate

- **Challenge**: Irish LGBTQI+ youth in rural areas face higher rates of bullying and social isolation; online hate has escalated.
- **Recommendation**:
    - Expand **EU digital safety standards** under the Digital Services Act to address hate speech targeting LGBTQI+ people, including **platform accountability** and community reporting.
    - Fund **rural outreach programs** that connect isolated LGBTQI+ individuals with peer support via online and mobile services.

6. Better Data, Better Policy

- **Challenge**: Ireland still lacks comprehensive disaggregated equality data on LGBTQI+ experiences in areas like housing, policing, and healthcare.
- **Recommendation**:
    - Require **standardised data collection across all Member States**, using FRA and Eurostat frameworks, disaggregated by gender identity, sexual orientation, race/ethnicity, and disability.
    - Encourage Member States to **collaborate with civil society** on ethical, participatory data practices.

7. Crisis Preparedness and Inclusive Humanitarian Response

- **Challenge:** During COVID-19 and Ukraine displacement, LGBTIQ people in Ireland (and arriving migrants) lacked targeted protection.
- **Recommendation:**
- Create an EU Emergency Inclusion Protocol ensuring shelters, relief, and health systems are safe for LGBTQI+ people.
- Mandate inclusive asylum procedures and training for officers on LGBTQI+ rights and vulnerabilities.

Ireland’s national experience—marked by progress in legal equality but persistent psychosocial and systemic challenges—underscores the need for a **deeper, intersectional, and life-course approach** at EU level. Mental health, education, and rural inclusion emerge as **high-impact intervention areas**.

Mental Health-Specific Data

The 2024 "Being LGBTQI+ in Ireland" report reveals a concerning decline in mental health among LGBTQI+ youth, with particularly high rates of depression, anxiety, self-harm, and suicidality among adolescents aged 14–18 and transgender and gender non-conforming individuals. These findings highlight the urgent need for targeted mental

health support and inclusive policies to address the specific challenges faced by these vulnerable groups.
LGBTQI+ youth in Ireland face significant mental health challenges, with recent studies indicating a decline in well-being since 2016. Despite advancements in LGBTQI+ rights, young individuals continue to experience high rates of depression, anxiety, self-harm, and suicidal ideation. Multiple factors contribute to these issues, including discrimination, lack of support, and societal pressures. However, various support services are available to assist LGBTQI+ youth in navigating these challenges.

Recent research indicates a deterioration in mental health among LGBTQI+ youth in Ireland 2016[20]:

- **Increased Symptoms**:
  - Severe/extremely severe depression symptoms rose by 17%.
  - Severe/extremely severe anxiety symptoms increased by 30%.
  - Severe/extremely severe stress symptoms grew by 33%.
- **Self-Harm and Suicidality**:
  - 72% of LGBTQI+ individuals aged 14–18 reported self-harming.
  - 77% experienced suicidal thoughts, and 33% had attempted suicide.
- **Transgender and Gender Non-Conforming Youth**:
  - Reported higher levels of mental health challenges compared to their cisgender peers, with 44% experiencing severe/extremely severe depression and 55% experiencing severe/extremely severe anxiety.

Factors Contributing to High Rates of Mental Health Issues

Several internal and external factors contribute to the mental health challenges faced by LGBTQI+ youth:

- **Internal Factors**:
  - Feelings of shame and confusion regarding one's identity.
  - Self-hatred and difficulty in self-acceptance.
- **External Factors**[21]:
  - Family rejection and lack of support.
  - Bullying and discrimination in schools and communities.
  - Negative media representation and societal rejection.
  - Exposure to anti-LGBTQI+ hate speech, both online and offline.
- **Additional Challenges**:
  - Transgender and non-binary youth face higher risks, with studies showing that 73% have self-harmed and 36% have attempted suicide[21].

- The COVID-19 pandemic has exacerbated mental health issues, with 58% of teenagers reporting worsened mental health during this period.

Gender recognition

- As of 2025, **Germany** and **Iceland** are the only European countries that fully recognize non-binary gender identities in legislation, allowing individuals to register a legal gender other than male or female. Other countries, such as **Malta**, **Austria**, and **Belgium**, offer partial recognition or have introduced third-gender options under specific conditions.
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- **Ireland: Binary Recognition Only**
- Ireland's **Gender Recognition Act 2015** allows individuals to change their legal gender through self-declaration but only recognizes male and female genders[22].
- Non-binary identities are not legally recognized, and there is no provision for a third gender option on official documents.

- **Germany: Comprehensive Legal Recognition**
- In **December 2018**, Germany introduced a third gender option, "diverse," in civil status records, primarily for intersex individuals [24].
- The **Self-Determination Act**, effective **November 1, 2024**, simplifies the process for transgender, intersex, and non-binary individuals to change their legal gender and name through self-declaration, removing previous medical and court requirements.
- **Iceland: Inclusive Gender Recognition**
- Since **2019**, Iceland allows individuals to register their gender as "X" and adopt gender-neutral family names, reflecting a non-binary identity [25].
- The **Gender Autonomy Act** permits self-determination of legal gender without medical intervention, supporting a broad spectrum of gender identities

Recommendations

- **Fund Member State pilot programs** for trauma-informed, LGBTIQ-inclusive mental health services.
- Promote the development of **EU-wide mental health indicators for LGBTIQ+ youth** to guide interventions & funding.
- Promote **best-practice guidance on gender recognition laws,** encouraging Member States to adopt **self-determination-based** systems with recognition for non-binary identities & minors.
- Fund **trans-led civil society organisations** to participate in policy design.
- Create **binding minimum standards for inclusive RSE** that respect national competence but require inclusion of sexual and gender diversity.
- Encourage **training programs for educators** that reflect intersectional identities, especially for neurodiverse or migrant LGBTIQ+ youth.

- Expedite adoption of the **EU Parenthood Recognition Regulation**, ensuring full legal recognition for rainbow families.
- Include **case studies & family testimonies** in implementation reviews to ensure practical impact.
- Expand **EU digital safety standards** under the Digital Services Act to address hate speech targeting LGBTIQ+ people, including **platform accountability** & community reporting.
- Fund **rural outreach programs** to connect isolated LGBTQI+ individuals with virtual peer support.
- Require **standardised data collection across all Member States**, using FRA & Eurostat frameworks, disaggregated by gender identity, sexual orientation, ethnicity, and disability.
- Encourage Member States to **collaborate with civil society** on ethical, participatory data practices.

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