

Article 41.2 of the Constitution of Ireland

June 2018



**Coimisiún na hÉireann um Chearta
an Duine agus Comhionannas**
Irish Human Rights and Equality Commission



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Article 41.2 of the Constitution of Ireland

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Introduction

The Irish Human Rights and Equality Commission ('the Commission') is both the national human rights institution and the national equality body for Ireland, established under the Irish Human Rights and Equality Commission Act 2014. In accordance with its founding legislation, the Commission is mandated to keep under review the adequacy and effectiveness of law and practice in the State relating to the protection of human rights and equality and to make recommendations to the Government to strengthen and uphold human rights and equality in the State.

In 2016 the Government committed to holding a referendum on Article 41.2 of the Constitution of Ireland, *Bunreacht na hÉireann*, in its *Programme for a Partnership Government*.¹ In response to a parliamentary question on 23 May 2018, the Minister for Justice and Equality, Charles Flanagan TD, stated that 'the issue of the provision on a woman's life within the home is being examined by my Department in collaboration with other relevant Departments and the Office of the Attorney General with a view to determining the best legal approach as regards the question to be put to the people' and it is proposed to hold a referendum on the matter in October 2018.²

Article 41 of the Constitution of Ireland protects the rights of the family and contains a number of provisions imposing duties on the State. Article 41.1 recognises the family as the 'natural primary and fundamental unit group of Society'. Noting that Article 41.3.1 obliges the State to 'guard with special care the institution of Marriage, on which the Family is founded' the Supreme Court has interpreted the references to the family in Article 41 as the family founded on marriage.³ Nevertheless in more recent cases, a wider interpretation of the types of familial relationships protected by Article 41 has been contemplated by the Superior Courts.⁴ In addition, following a referendum to amend Article 41 of the

¹ A Programme for a Partnership Government (2016), p. 153.

² Dáil debates, Wednesday, 23 May 2018, Question No. 18892/18.

³ *State (Nicolaou) v An Bord Uchtála* [1996] IR 567. This narrow judicial interpretation has been the subject of much litigation and debate.

⁴ *RX, QMA & CX v Minister for Justice, Equality and Law Reform* [2010] IEHC 446. In that case Mr Justice Hogan stated: 'The fact that marriage was (and, of course, is) regarded as the bedrock of the family contemplated by the Constitution does not mean that other close relatives could not, at least under certain circumstances, come within the scope of Article 41'.

Constitution in 2015, the constitutional definition of the family has been expanded to include married same-sex couples.⁵ Legislation and public policy also recognise a much broader range of family relationships, for example through the introduction of automatic guardianship rights to unmarried fathers in certain circumstances⁶ and the provision for cohabiting couples and one parent families in the social welfare code.

Article 41.2 states:

1. In particular, the State recognises that by her life within the home, woman gives to the State a support without which the common good cannot be achieved.
2. The State shall, therefore, endeavour to ensure that mothers shall not be obliged by economic necessity to engage in labour to the neglect of their duties in the home.

Even when the Constitution was being drafted, its treatment of women in Article 41.2 and other provisions was ‘the single biggest policy issue which dominated much of the debate at the time both inside and outside the Dáil’.⁷ Since the adoption of the Constitution, and particularly in the last thirty years, there have been repeated calls at both the national and international level to amend or remove Article 41.2.

In this Statement the Commission sets out a summary of equality and human rights concerns with respect to Article 41.2 and suggests how these might be addressed.

⁵ Article 41.4 provides that ‘marriage may be contracted in accordance with law by two persons without distinction as to their sex’. Previously the High Court defined marriage as between a man and a woman in *Zappone & Gilligan v. Revenue Commissioners & Ors* [2006] IEHC 404. See also: IHREC (2015) *Policy Statement on Access to Civil Marriage*, available:

https://www.ihrec.ie/download/pdf/ihrec_policy_statement_access_civil_marriage_11_feb_2015.pdf

⁶ Section 6 of the Guardianship of Infants Act 1964, as amended by the Children and Family Relationships Act 2015. For an overview of the amendments see: O’Toole and Mahon (2016) ‘Guardianship and the family’ *Bar Review*, 21(4). See further: Bergin-Cross (2015) ‘The Evolution of the Definition of Marriage and the Family under the Irish Constitution’, *Irish Journal of Family Law*, 15(2).

⁷ Convention on the Constitution (2013) *Second report of the Convention on the Constitution*, p. 11

Gender Stereotyping

The Commission and its predecessor bodies, have previously highlighted human rights and equality concerns with respect to Article 41.2. Most recently the Commission's 2017 report to the United Nations Committee on the Elimination of Discrimination Against Women (CEDAW) noted 'that this provision perpetuates stereotypical attitudes towards the role of women in Irish society' and stated that:

The Commission is of the view that constitutional reform is necessary in order to address stereotyping concerning the roles and responsibilities of women and men in the family and in society and encourages the Government to call a referendum on Article 41.2 of the Constitution of Ireland without delay⁸

It has been argued that the papers from drafters of the Constitution, Éamon deValera and John Hearne in particular, indicate that the provision did not intend to either confine women to the home or to limit the rights of women.⁹ Also in *Sinnott v Ireland*, Ms Justice Denham (as she then was), observed, in a dissenting judgment, that:

Article 41.2 does not assign women to a domestic role. Article 41.2 recognises the significant role played by wives and mothers in the home. This recognition and acknowledgement does not exclude women and mothers from other roles and activities.

Recognising that Article 41.2 may be read in two ways, Scannell agrees with the view that the provision may be read as 'tribute to the work that is done by women in the home as mothers', which provides a constitutional guarantee to support women working in the home.¹⁰ On the other hand, Scannell argues that some may view Article 41.2 as 'grossly offensive' and it may be regarded as 'the grossest form of sexual stereotyping' which denies

⁸ IHREC (2017) *Ireland and the Convention on the Elimination of All Forms of Discrimination Against Women*, pages 53-54.

⁹ All Party Oireachtas Committee on the Constitution (2006) *Tenth Progress Report*, p. 108.

¹⁰ Scannell, "The Constitution and the Role of Women" in Farrell ed., *De Valera's Constitution and Ours* (Dublin, 1988) at 124-125 as cited in Hogan (2005) 'DeValera, the Constitution and the Historians' *The Irish Jurist* 40(1), 293-320.

women a freedom of choice that men take for granted, particularly given that the duties of fathers are not mentioned in the Constitution.¹¹

Reviewing a number of legal historians' views on the question of whether the Constitution discriminates against women, Hogan concludes that 'almost no one today would deny that this provision [Article 41.2] is (at best) paternalistic and is wholly unsuited to modern conditions'.¹² In his presentation to the Convention on the Constitution, Professor Gerry Whyte observed:

While Article 41.2 does not appear to have ever been cited explicitly by either the Oireachtas or the courts to justify such gender discrimination, it undoubtedly reflected a system of values that permitted such discrimination until the process of securing gender equality in employment began in the 1970s.¹³

The Commission remains concerned that the language used in Article 41.2 of the Constitution of Ireland continues to perpetuate stereotypical attitudes towards the role of women in Irish society.

It may be argued that the so-called marriage bar, which required women in public service jobs to leave their employment upon marriage, may be viewed as an example of such discrimination. The impact of the marriage bar is still evident today for those who were forced to leave employment prior to 1973 and engaged in care work prior to 1994, when the Homemaker's Scheme was introduced.¹⁴ The Commission has previously recommended that women who were discriminated against by the marriage bar should not be precluded from the Homemaker's Scheme and it should be applied retrospectively by the State immediately, in order to ensure equitable access to the contributory State pension.¹⁵

Moreover, the Commission is of view that Article 41.2 is not compatible with Ireland's international human rights obligations, in particular Articles 2, 5, 7 and 11 of the UN

¹¹ Scannell, "The Constitution and the Role of Women" in Farrell ed. (1988) *De Valera's Constitution and Ours*, p. 124-125 as cited in Hogan (2005) 'DeValera, the Constitution and the Historians' *Irish Jurist* 40(1), 293-320.

¹² Hogan (2005) 'DeValera, the Constitution and the Historians' *Irish Jurist* 40(1), 293-320.

¹³ Convention on the Constitution (2013) *Second report of the Convention on the Constitution*, p 11.

¹⁴ The Homemaker's Scheme allows up to twenty years out of the workforce due to care responsibilities to be discounted from the pension assessment.

¹⁵ IHREC (2017) *Ireland and the Convention on the Elimination of All Forms of Discrimination against Women*, p. 93.

Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and Articles 3, 25 and 26 of the International Covenant on Civil and Political Rights (ICCPR).

CEDAW requires States to ‘embody the principle of the equality of men and women in their national constitutions or other appropriate legislation’ and to take all appropriate measures to eliminate ‘prejudices and customary and all other practices which are based on the idea of the inferiority or the superiority of either of the sexes or on stereotyped roles for men and women’.¹⁶

Commenting on these obligations, the Committee on the Elimination of Discrimination Against Women (CEDAW Committee), the expert body in charge of monitoring States Parties implementation of the Convention, has stated:

Inherent to the principle of equality between men and women, or gender equality, is the concept that all human beings, regardless of sex, are free to develop their personal abilities, pursue their professional careers and make choices without the limitations set by stereotypes, rigid gender roles and prejudices.¹⁷

In its 2005 Concluding Observations on Ireland, the CEDAW Committee expressed the following concerns:

[...] the persistence of traditional stereotypical views of the social roles and responsibilities of women and men in the family and in society at large which are reflected in article 41.2 of the Constitution and its male-oriented language, as recognized by the All-Party Oireachtas Committee on the Constitution, in women’s educational choices and employment patterns, and in women’s low participation in political and public life.¹⁸

The CEDAW Committee recalled these concerns in its 2017 Concluding Observations on Ireland, stating that it:

[...] regrets that the existing discriminatory provision contained in article 41.2 of the Constitution, which perpetuates traditional stereotypical views of the social roles and

¹⁶ Articles 2(a) and 5(a) CEDAW. Ireland ratified CEDAW in 1985 and has been examined by CEDAW four times on its implementation of the Convention.

¹⁷ CEDAW (2010) *General Recommendation No. 28 on the core obligations of States parties under article 2 of the Convention on the Elimination of All Forms of Discrimination against Women*, CEDAW/C/GC/28, para 22.

¹⁸ CEDAW (2005) *Concluding Observations on Ireland’s Combined Fourth and Fifth Reports*, UN Doc. CEDAW/C/IRL/CO/4-5, para 24.

responsibilities of women and men in the family and in society at large, has not been amended.¹⁹

Similarly, the UN Human Rights Committee, the expert body monitoring the implementation of the ICCPR, criticised Article 41.2 for its perpetuation of:

[...] traditional attitudes toward the restricted role of women in public life, in society and in the family', in breach of the State's obligations under Articles 3 (equality between women and men), 25 (equality in public life) and 26 (equality before the law) of the International Covenant on Civil and Political Rights.²⁰

In its 2014 Concluding Observations on Ireland, the UN Human Rights Committee welcomed the recommendations of the Convention on the Constitution in 2013 to amend or modify Article 41.2, and the State's commitment to hold a referendum and to establish a Task Force on the matter. It also, however stated that it:

regrets the slow pace of progress in modifying the language of article 41.2 of the Constitution on the role of women in the home.²¹

¹⁹ CEDAW (2017) *Concluding Observations on the combined sixth and seventh periodic reports of Ireland*, UN Doc. CEDAW/C/IRL/CO/6-7, para 10.

²⁰ Human Rights Committee (2008) *Concluding Observations on Ireland's Third Periodic Report*, UN Doc. CCPR/C/IRL/CO/3, para 10.

²¹ UN Human Rights Committee (2014) *Concluding observations on the fourth periodic report of Ireland*, CCPR/C/IRL/CO/4, para 7.

Recognition of Care Work

It has been argued that Article 41.2 represents ‘an important constitutional affirmation of the public and essential good that care work provides to the State in the pursuance of ‘the common good’.²² This has arisen in a number of cases before the Superior Courts. In *Sinnott v Ireland*, Ms Justice Denham (as she then was), in a dissenting judgment, described Article 41.2 as ‘a recognition of the work performed by women in the home. The work is recognised because it has immense benefit for society’.²³ In *DT v CT*, a divorce case that considered whether ‘proper provision’ had been made for a spouse in accordance with the Constitution, Mr Justice Murray, interpreting the Constitution as a ‘contemporary document’, recognised that ‘the duties and obligations of spouses are mutual and, ... [the Constitution] implicitly recognises similarly the value of a man’s contribution in the home as a parent’.²⁴

However, as noted by the Constitutional Review Group in 1996 Article 41.2 ‘has not been of any particular assistance even to women working exclusively within the home’.²⁵ For example, in *L v L* the Supreme Court rejected an argument grounded in Article 41.2 to support a married women’s claim to a 50 per cent share in the family home on the basis that Article 41.2 did not give the Courts jurisdiction to make a transfer of property in favour of a mother.²⁶

While Article 41.2.1 may be viewed as a negative obligation since it is a statement of recognition of the value of care work to society, Article 41.2.2 places a positive obligation on the State to ‘endeavour to ensure that mothers shall not be obliged by economic necessity to engage in labour’ outside the home. Indeed, according to draft papers on the Constitution, the purpose of Article 41.2 was to ensure ‘that the state should provide economic support if the mother needed to stay at home’.²⁷ It may be argued that the support for care work envisaged by Article 41.2.2 lays the foundation for recognising a right

²² Olivia Smith (2012) ‘How Far From a “Right to Care”? Reconciling Care Work and Labour Market Work In Ireland’ *Irish Jurist* 47(1), 143-167, p 148.

²³ [2001] IESC 63

²⁴ [2002] IESC 68.

²⁵ Constitution Review Group (1996) *Report of the Constitution Review Group* (Dublin: Government Publications), pp. 333–334.

²⁶ *L v L* [1992] 2 IR 77.

²⁷ All Party Oireachtas Committee on the Constitution (2006) *Tenth Progress Report*, p 108.

to social security, albeit in a particular context, in the Constitution. In international law, such a right is recognised in the context of facilitating the enjoyment of the rights to work and to participate in public life. Article 11(2)(c) CEDAW requires State Parties:

To encourage the provision of the necessary supporting social services to enable parents to combine family obligations with work responsibilities and participation in public life, in particular through promoting the establishment and development of a network of child-care facilities.

Commenting on this view of Article 41.2.2 in his presentation to the Convention on the Constitution, Professor Gerry Whyte recalled the late Supreme Court judge Brian Walsh's description of Article 41.2.2 as 'a protective guarantee'.²⁸ Nonetheless, Professor Whyte noted that others have described Article 41.2 as 'a "duty of imperfect obligation" and is certainly not as onerous as other constitutional duties imposed on the State'.²⁹ He also recognised that the courts would be unlikely to interpret the current Article 41.2.2 as imposing additional financial obligations on the State to support mothers in the home given that tax and social welfare impact on public expenditure. This view is based on the exercise of judicial caution in a number of matters raising economic, social and cultural rights before the Irish Superior Courts³⁰.

The Commission notes that the strengthening of protection of economic, social and cultural rights in the Constitution is currently a matter of public debate. The Eighth Report of the Convention on the Constitution³¹ currently stands referred to the Joint Oireachtas Committee on Finance, Public Expenditure and Reform, and Taoiseach for consideration of the recommendation to amend the Constitution to strengthen the protection of economic, social and cultural rights and to consider any 'implications arising in terms of balance of rights, good governance (including the separation of powers) and resource prioritisation'.³² While a full exposition of the arguments for and against strengthening socio-economic rights

²⁸ Convention on the Constitution (2013) *Second report of the Convention on the Constitution*, p 12-13.

²⁹ Convention on the Constitution (2013) *Second report of the Convention on the Constitution*, p 12-13.

³⁰ For example, *T.D. v Minister for Education* [2001] 4 IR 259.

³¹ Convention on the Constitution (2014) *Eighth Report of the Convention on the Constitution*.

³² Following on from a commitment in the Programme for a Partnership Government, Eoghan Murphy TD proposed a motion to refer the report, which was passed by Dáil Éireann on 28 September 2017.

protection in the Constitution is beyond the scope of this paper, the Commission reiterates its view that socio-economic rights should be fully recognised in the Constitution of Ireland.

Previous Proposals on Article 41.2

In 2013, 88 per cent of the members of the Convention on the Constitution voted in favour of amending or modifying Article 41.2, 98 per cent suggested it should be made gender neutral to include other carers in the home and 62 per cent suggested that carers beyond the home should be included.³³

In its response to the report of the Convention, the Government accepted the recommendation to amend the language in Article 41.2 and the Minister for Justice and Equality established a Task Force on Implementation of the Recommendations of the Second Report of the Convention on the Constitution ('the Task Force') to consider all previous proposals in order to devise the most appropriate wording.³⁴

The main previous proposals considered were the following:

- In 1993 the Second Commission on the Status of Women recommended the deletion of Article 41.2.2
- In 1996 the Constitution Review Group recommended deleting Article 41.2 and replacing it with the following:

The State recognises that *home and family life* gives to society a support without which the common good cannot be achieved. The State shall endeavour to support *persons caring for others* within the home. (*Emphasis added*)

- In 1997 the First Progress Report of the All-Party Oireachtas Committee on the Constitution recommended deleting Article 41.2 and replacing it with the following:

³³ Convention on the Constitution (May 2013), *Second Report of the Convention on the Constitution*.

³⁴ Minister for Justice and Equality delivered the Government's response to the Convention's Second Report in the Dáil on 10 October 2013. The Task Force was comprised of officials from the Department of Justice and Equality and was assisted in its work by the Departments of Health, Social Protection, and Public Expenditure and Reform and the Office of the Attorney General. The report of the Task Force was published on the website of the Department of Justice and Equality in October 2016 ('hereafter Task Force Report'), see: http://www.justice.ie/en/JELR/TaskForceReport_Impl-2nd-Rpt-Conv-Constit.pdf/Files/TaskForceReport_Impl-2nd-Rpt-Conv-Constit.pdf

The State recognises that *family life* gives to society a support without which the common good cannot be achieved. The State shall endeavour to *support persons caring for others* within the home. *(Emphasis added)*

- In 2006 the Tenth Progress Report of the All-Party Oireachtas Committee on the Constitution recommended amending Article 41.2.1 to and 41.2.2 to read:

The State recognises that by reason of *family life within the home*, a parent gives to the State a support without which the common good cannot be achieved. *(Emphasis added)*

The State shall, therefore, endeavour to ensure that *both parents* shall not be obliged by economic necessity to work outside the home to the neglect of their *parental duties*. *(Emphasis added)*

In its 2016 Report, the Task Force put forward two options. The first option suggested amending Article 41.2 as follows:

The State recognises that *home and family life* gives to society a support without which the common good cannot be achieved. The State shall endeavour to support *persons caring for others* within the home *as may be determined by law*. *(Emphasis added)*

This is essentially the text proposed by the Constitution Review Group in 1996 with the addition of the qualifier '*as may be determined by law*'.

The second option proposed by the Task Force contained two proposals. Firstly, amending Article 41.2 as follows:

The State recognises that *home and family life* gives to society a support without which the common good cannot be achieved. *(Emphasis added)*

This in effect amends 41.2.1 by replacing it with the first part of the 1996 Constitution Review Group text. Secondly, the Task Force suggested inserting the following provision into Article 45 of the Constitution:

The State shall endeavour to ensure that *persons caring for others in the home and in the wider community* receive support in recognition of the contribution they make to society. (*Emphasis added*)

Article 45 sets out Directive Principles of Social Policy that ‘are intended for the general guidance of the Oireachtas ... and shall not be cognisable by any Court’. Thus, this proposal, while widening the scope of the provision by referencing caring for others in the wider community, does so at the cost of weakening any existing positive obligation in respect of family care work.

Approaches to Reform

As outlined above, the Commission is of the view that Article 41.2 perpetuates gender stereotypes and embeds a value system in our constitutional framework that serves to undermine gender equality. While rendering Article 41.2 gender neutral will assist somewhat in addressing stereotyping in our legal framework the Commission is of the view that in order to advance gender equality further, it is necessary to include an explicit provision on gender equality in the Constitution and reiterates its previous call for the implementation of the recommendations of the Task Force in that regard.³⁵

It is also important to make Article 41.2 gender neutral in order to recognise same-sex male couples following the insertion of Article 41.4 into the Constitution in 2015.

The Commission reiterates its position that Article 41.2 should be amended to make it gender-neutral.

The concept of family life

The various amendments set out above propose a number of ways to achieve gender neutrality, namely by replacing references to ‘woman’ and ‘mothers’ with references to either ‘family life’, ‘home and family life’, ‘the parent’ or ‘the person’. Given that Article 41.2 exists within the rubric of the constitutional protection of the family, as outlined above, the Commission broadly supports the recommendations which suggest replacing references to ‘woman’ and ‘mothers’ with a reference to ‘family life’. However, when choosing the precise wording it is essential that human rights and equality considerations are taken into account in order to ensure that the formulation is in keeping with the developing constitutional conception of family.

³⁵ The Task Force recommended that further consideration be given to this in the wider context of the recommendations of the 1996 Constitutional Review Group. Task Force Report, p. 20.

As well as being recognised in Irish law, family rights are also recognised by a number of international human rights treaties,³⁶ in particular Article 8 of the European Convention on Human Rights (ECHR).³⁷ In its jurisprudence the European Court of Human Rights has broadly conceived ‘family life’ beyond the nuclear family to recognise familial relationships where there is evidence of the existence of close personal ties, i.e. *de facto* family ties.³⁸ Bearing this in mind, when amending Article 41.2, regard should be had to the wide range of family relationships that have been recognised in the context of international human rights law as well as in domestic law and policy.

The Commission also has concerns that references to ‘the home’, as proposed in all other reports, including both options presented by the Task Force, might lead to a narrow conception of family life. In that regard the Commission notes that the European Court of Human Rights has recognised the relationship between adults and their parents and siblings as constituting family life protected under Article 8 even where the adult did not live with his parents or siblings.³⁹ Given that the Supreme Court has long recognised that a childless married couple constitute a ‘family’ for the purposes of Article 41⁴⁰, it is arguable that the type of care work envisaged by Article 41.2 goes beyond childcare and could therefore take place outside the context of the home.

The Commission is of the view Article 41.2 should be amended to reference ‘family life’ and ‘family life’ should be understood as including a wide range of family relationships and include situations where family members do not live in the same home.

³⁶ Article 16(3) Universal Declaration of Human Rights recognises that ‘the family is the natural and fundamental group unit of society and is entitled to protection by society and the State’. This is echoed in Article 23(1) of the International Covenant on Civil and Political Rights (ICCPR). Article 10 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) which states that ‘the widest possible protection and assistance should be accorded to the family’.

³⁷ The ECHR has been indirectly incorporated into Irish law by the European Convention on Human Rights Act 2003.

³⁸ For an overview of the Court’s jurisprudence on Article 8 see:
http://www.echr.coe.int/Documents/Guide_Art_8_ENG.pdf

³⁹ *Boughanemi v. France*, Application no. 22070/93, 24 April 1996, para 35.

⁴⁰ *Murray v Ireland* [1985] IR 532, 537.

Recognising and supporting care work

As well as rendering Article 41.2 gender neutral, further questions arise as to how care work should be recognised and supported. The Convention on the Constitution considered the recognition of care work in its deliberations and voted on the level of obligation that should be placed on the State in the context of Article 41.2.2. Members ranked the preferred level of support on a scale of 1-5 with 20 per cent of members ranking 'endeavour to support', 35 per cent of members ranking 'provide a reasonable level of support' and 30 per cent of members ranked 'shall support'. In summary 'the average position held on this 5-point scale was 3.22, indicating that the Convention as a whole favoured a reasonable level of State support'.⁴¹

As already argued above, adoption of the term 'family life' gives recognition to a wider range of caring relationships than parenting alone and allows for the fact that some of these relationships may give rise to care work beyond the family home. Taking account of the views of the Convention, this wider recognition could be reflected in a positive obligation within Article 41.2 in a number of ways such as incorporating a statement that: 'The State shall provide a reasonable level of support to parents and others providing family care'.

The Commission is of the view that Article 41.2 should be amended to recognise and support care work.

⁴¹ Convention on the Constitution (May 2013), *Second Report of the Convention on the Constitution*.



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