



An Roinn Sláinte  
Department of Health

# Review of the operation of the Health (Regulation of Termination of Pregnancy) Act 2018

## Public Consultation

Fields marked with \* are mandatory.

### [Information on the Public Consultation](#)

---

The Department of Health invites members of the public and interested parties to make submissions as part of the review of the operation of the Health (Regulation of Termination of Pregnancy) Act 2018.

The consultation has two parts:

- Part 1 - Your details
- Part 2 - Your views

Part 1 requests some information about the person or organisation making the submission. The information given will be used to provide context. This is the only reason for collecting this information.

Part 2 is the main part of the consultation. It has questions to seek people's views on the operation of the Health (Regulation of Termination of Pregnancy) Act 2018. There are opportunities to share your views in more detail throughout.

While recognising that there are a variety of views on the issue of termination of pregnancy generally, the Department is specifically seeking submissions on the operation of the Health (Regulation of Termination of Pregnancy) Act 2018.

Submissions responding to the questions set out in the consultation document below are welcome. Submissions outside the scope of the review of the operation of the Health (Regulation of Termination of Pregnancy) Act cannot be addressed in this forum.

### **Making a Submission**

Before making any submission, please review the privacy information below, including information on the publication of submissions. If after reading this you wish to make a submission, a submission may be made in the following ways:

- By submitting your responses online via this form.
- By emailing your completed submission as an attachment (PDF or Word doc) to [Bioethics2Unit@health.gov.ie](mailto:Bioethics2Unit@health.gov.ie), with the subject line “Review of the operation of the Act”.
- By posting your completed submission to: Bioethics 2 Unit Public Consultation, Department of Health, Block 1, Miesian Plaza, 50-58 Lower Baggot Street, Dublin, D02 XW14.

### **Deadline**

**The closing date for responses is close of business on Friday, April 1st 2022. Submissions received after the deadline cannot be considered and extensions cannot be provided.**

### **Next steps**

The Department will review every submission received following the deadline. Submissions will help inform the review of the operation of the Act.

The Department expects to publish submissions on its website and on [www.gov.ie](http://www.gov.ie).

## Privacy Notice

---

Any personal information which you volunteer to this Department will be treated with the highest standards of security and confidentiality, strictly in accordance with the General Data Protection Regulation 2016/67 and the Data Protection Act 2018. However, please note the following:

- The Department expects to publish submissions and a report outlining the key themes arising from the public consultation. The Department may include a full list of those who make submissions in an appendix to any report. **Please indicate in the comment box at the end of the submission if you are including personal information and do not consent to your name and/or your submission being published.**
- As information received by the Department is subject to the Freedom of Information Act 2014, such information may be considered for possible release under that Act. **Please indicate in the comment box at the end of the submission if you are including personal, confidential or commercially sensitive information in your submission and wish this information to be redacted in any release.** Otherwise, it will be presumed that the information contained in your submission is releasable under the Freedom of Information Act 2014. Any personal information included in your submission would be redacted prior to release.
- The information provided in the submissions may be shared with relevant Government Departments and State organisations during the review process. Any personal and identifying information will be redacted prior to sharing.

- By providing a submission to the Department, you are consenting to your data being processed by the Department. Your data will only be used in the context of the review of the operation of the Health (Regulation of Termination of Pregnancy) Act 2018, and for no other purpose. If, at any time, you wish to withdraw your submission please contact **Bioethics2Unit@health.gov.ie**
- The Department’s Privacy Policy can be viewed [here](#)
- Submissions will be retained until the review process has been concluded and the final report has been published.

## Part 1 – Your Details

---

In this section, we ask that you tell us a little about yourself, so we can look at the submissions received from different points of view. This is the only reason for collecting this information.

**Please note, while separate strands of in-depth qualitative research under the review will consider the operation of the Act specifically from the service user and from the service provider perspectives, service users and service providers are also most welcome to contribute their views through this public consultation process.**

**\* Q1. Are you completing this questionnaire (please tick below):**

- On behalf of an organisation
- As an individual

## Section B. For Organisations

---

**Q2(i). What is the name of your organisation?**

The Iona Institute

**Q2(j). Please tick the category that best describes your organisation:**

*at most 3 choice(s)*

- Union/Staff Representative Body
- State Body
- Regulatory Body
- Advocacy Body / Special Interest Group
- Volunteer/ Not for Profit
- Representative Body
- Religious Group
- Political Party
- Patient Interest Group
- Academic Institution
- Hospital
- Hospital Group
- GP Practice
- Community Healthcare Organisation
- Community Healthcare Network
- Other

**Q2(k). Is your organisation involved in the provision of termination of pregnancy services?**

- Yes
- No

**Q2(l). What is the address of your organisation?**

23 Merrion Square, Dublin 2

**Q2(m). What is your name and job title?**

First name

David

Last name

Quinn

---

Job title

Director

## Part 2 – Your Views

---

In this section, we seek your views on the operation of the Health (Regulation of Termination of Pregnancy) Act 2018.

**Please insert your written response in the text boxes provided. The Department respectfully asks that the word limit not exceed 500 words (3200 characters) per box.**

**Please address your responses to the questions asked; material submitted which does not respond to the questions will be considered beyond the scope of the consultation and cannot be included in the review of the operation of the Act.**

**Q3(a). To what extent do you agree that the Health (Regulation of Termination of Pregnancy) Act 2018 has achieved what it set out to do?**

- Strongly Disagree
- Somewhat Disagree
- Neutral
- Somewhat Agree
- Strongly Agree

**Q3(b). Please provide detail / evidence to support your answer**

*3200 character(s) maximum*

**Q4(a). Are there parts of the Act which, in your opinion, have not operated well?**

- Yes
- No
- Don't know

**Q4(b). If yes, please let us know which section(s) of the Act, and details of the issue(s) it is causing.**

**Please provide detail / evidence to support your answer.**

*3200 character(s) maximum*

1. The case of Rebecca Price and her partner reveals serious shortcomings.(See here:<https://www.irishexaminer.com/opinion/commentanalysis/arid-40322738.html>). They were wrongly told at Holles Street that their baby had a fatal disability. The scan was inaccurate and they were not told about the shortcomings of these scans. In addition, it appears that Ms Price was not seen by two doctors before they signed off on terminating her pregnancy. Has this happened in other cases? Are patients now told about the shortcomings of these prenatal tests? Are they properly informed about the likelihood of baby with a life-limiting conditions surviving past 28 days after birth?

2. A recent study raised the distinct likelihood that late-term fetuses are being born alive in some cases after a termination and are being left to die. (See here: <https://pubmed.ncbi.nlm.nih.gov/32935467/>). The study says that "FMSs (Fetal Medicine Specialists) are 'unclear as to who will look after these babies' if a baby is born alive following TOP (Termination of Pregnancy) by induction of labour and without feticide, resulting in them 'begging people to help' them in providing palliative care". This needs to be investigated as a matter of extreme urgency.

**Q5(a). Are there parts of the Act which, in your opinion, have operated well?**

- Yes
- No
- Don't know

**Q5(b). If yes, please let us know which section(s) of the Act, and details of how it has operated / its benefit(s).**

**Please provide detail / evidence to support your answer.**

*3200 character(s) maximum*

**Q6. Are there any further comments you would like to make on the operation of the legislation?**

**Please provide detail / evidence to support your answer, where possible.**

*3200 character(s) maximum*

1. Very little data is gathered, or published. This is out of line with most other countries. It is therefore extremely difficult to analyse who is having abortions or why. Such information would be helpful, among other things, in devising a strategy to reduce our abortion rate. something everyone should want.

2. In 2020, 20pc of women who had an initial consultation with a doctor about having an abortion changed their minds and did not proceed with it. This indicates that the three-day reflection period could be saving lives. It allows women to have more time to decide what they really want to do. If proper counselling was

required with the first consultation, even more lives would be possibly be saved. (See more here: <https://ionainstitute.ie/some-good-news-on-the-abortion-front-for-a-change/>)

**Q7. Do you have any comments about services provided under the Act?  
Please provide detail / evidence to support your answer, where possible.**

*3200 character(s) maximum*

See above.

**Q8. Prior to this consultation what was your awareness of the Act?**

- Not aware of any provisions of the Act
- Aware of some provisions of the Act
- Aware of most provisions of the Act
- Aware of all provisions of the Act

### Note on Personal Information

---

**Q9. Do you consent to your submission being released by the Department of Health?**

- Yes
- Yes, some parts may be released
- No, it contains personal or confidential material

**Contact**

Bioethics2Unit@health.gov.ie



