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Committee on the Rights of the Child
Office of the United Nations High Commissioner for Human
Rights Palais Wilson
52, Rue des Pâquis
CH-1201 Geneva

30 June 2025

Re: Consultation on General Comment No. 27

A dhaoine uasaile,

Thank you for the opportunity to provide comment on the Committee's draft *General Comment No. 27 on children's right to access justice and to an effective remedy*. The Irish Penal Reform Trust (IPRT) is Ireland's principal independent non-governmental organisation working for systemic penal reform and change. IPRT provided substantive input on the draft General Comment in our [submission](#) to the Committee in August 2024, and the comments here should be read in conjunction with that submission.

In our previous submission, IPRT highlighted issues related to access to justice for children and young people who have a parent or family member in prison. This is a group too often forgotten, despite the significant impact that the imprisonment of a caregiver or other family member has on their lives and the lack of consideration afforded to their best interests during sentencing. It is therefore regrettable that the draft General Comment fails to acknowledge the distinct needs and vulnerabilities of this group. IPRT encourages the Committee to include children with a parent or caregiver in prison as a specific group in paragraph 27 of the draft General Comment, and include the judiciary in the list of public administration bodies at paragraph 19.

The consideration of children deprived of their liberty in the draft General Comment is welcomed by IPRT. We would suggest strengthening paragraph 48 by including the heightened risk and fear of reprisals experienced by children deprived of their liberty as a specific factor of vulnerability and a distinct obstacle in accessing remedial mechanisms.

Patron of IPRT

Michael D. Higgins
President of Ireland

IPRT Board of Directors

Derval McDonagh (*Chair*)
Dr Lisa Cuthbert
Ashling Golden
Amy McArdle

Noel Moloney
Dr Róisín Mulgrew
David O'Riordan
Dr Liam Thornton

If IPRT may be of further assistance to the Committee on this matter, please do not hesitate to contact us by way of reply or at tlord@iprt.ie.

Is mise le meas,

A handwritten signature in black ink, appearing to read 'Saoirse Brady'.

Saoirse Brady
Executive Director

Sent by electronic mail

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