



**93rd Pre-session of the UNCRC Committee
UN Convention on the Rights of the Child - Ireland**

**Joint Alternative Report by a Coalition of Traveller and Roma
Organisations: Traveller and Roma Children**

August 2022



Photo by Derek Speirs – Traveller halting site in Finglas, North Dublin

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INTRODUCTION

Our Coalition

This report is submitted as a coalition of five organisations which work towards achieving Traveller and Roma rights in Ireland. **Pavee Point Traveller and Roma Centre** is a national non-governmental organisation working towards the attainment of human rights for Irish Travellers and Roma in Ireland since 1985. The **National Traveller Women's Forum** is a network of Traveller women and Traveller organisations throughout Ireland that recognises the particular oppression of Traveller women in Irish society. **Minceirs Whiden** is Ireland's only all Traveller forum formed in 2004 to create a safe place where Travellers can come together and discuss the issues affecting their community. **Donegal Travellers Project**, formed in 1996, is one of the longest established and largest locally based community development organisations working for, and with, the Traveller community. Finally, the **Galway Traveller Movement**, established in 1994, aims to achieve equality and self-determination for the Traveller community in Galway city and county.

Irish Travellers and Roma in Ireland

There are a little over 36,000 Irish Travellers in Ireland, representing less than 1% of the nation's population,¹ and an estimated 15,387 Traveller children aged 19 years and under.² An estimated 5,000 Roma live in Ireland, many of whom live in poverty due to lack of access to work and restrictive social welfare measures.³ 52% of surveyed Roma households in Ireland have two children or fewer, 30% have three or four children and almost 18% have five or more children.⁴ As minority ethnic groups, Traveller and Roma children experience persistent racism and discrimination on the basis of ethnicity, gender and other grounds. As a result, Traveller and Roma children are among the most marginalised children in Ireland.

Our Report

We welcome the State's engagement with international human rights monitoring processes at the UN level and the consultation process towards producing its report to the UN Committee on the Rights of the Child. Our submission follows the structure of the State Report and the relevant Articles of the Convention. We respectfully suggest key issues and recommendations for the Committee to take into account in forming its Concluding Observations of Ireland. The priority areas of concern will require urgent action in the light of persistent social exclusion, racism and discrimination faced by Traveller and Roma children, as well as the disproportionate and persistent impact of the COVID-19 pandemic mitigation measures on Traveller and Roma children.

While we have welcomed the State's symbolic recognition of Irish Travellers as an ethnic group in 2017, we draw attention to areas where the previous Concluding Observations by the Committee have not been implemented or have only been partially progressed (references are made to the 2016 COBs throughout our report). We also make references to recommendations made by other UN treaty monitoring bodies in relation to our priority issues and urge the State to implement these recommendations.

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¹ Kelleher et al., *All Ireland Traveller Health Study*, University College Dublin & Department of Health & Children, 2010.

² Department of Children, Equality, Disability, Integration & Youth, [EU Child Guarantee Ireland's National Action Plan](#).

³ This estimate is based on the findings of Ireland's first National Roma Needs Assessment. Curran, S., A. Crickley, A., R. Fay, F. McGaughey (eds), *Roma in Ireland - a National Needs Assessment*, Department of Justice and Equality and Pavee Point Traveller and Roma Centre, 2018.

⁴ Ibid.

SUMMARY OF RECOMMENDATIONS

GENERAL MEASURES OF IMPLEMENTATION – COMPREHENSIVE POLICY, STRATEGY & COORDINATION

National Traveller Roma Inclusion Strategy (NTRIS): In line with the new EU Roma Strategic Framework 2020-2030 we recommend the State to:

- a) Urgently finalise the review of the current National Traveller Roma Inclusion Strategy 2017–2021 and ensure the now delayed development of the next NTRIS is commenced with no further delay
- b) Also ensure the next NTRIS has a robust implementation and monitoring plan with clear targets, indicators, outcomes, timeframes and budget lines related to Traveller & Roma children, and that actions are resourced and implemented by all relevant statutory agencies

Mainstream Policy and Institutional Developments: Introduce a clear implementation plan with targets, indicators and budget lines for Traveller and Roma children in the National Action Plan on Child Guarantee, in measures to progress the SDG goals, and other relevant mainstream policy measures

Allocation of Resources & Equality Budgeting: Allocate specific budget lines through the National Traveller Roma Inclusion Strategy (NTRIS) and other relevant targeted and mainstream measures to address the human rights situation of Traveller and Roma children

Data Collection & the National Equality Data Strategy: Develop and fully implement the National Equality Data Strategy, and as part of this Strategy ensure the full and effective development and implementation of ethnic equality monitoring across all relevant state departments and public bodies. Ensure ethnic equality monitoring takes place in line with human rights standards and that disaggregated data by ethnicity, gender and age is used to equality proof state policies, budgets and programming relating to Traveller and Roma children

GENERAL PRINCIPLES

Non-discrimination (Article 2) - National Action Plan against Racism: Ensure the forthcoming National Action Plan against Racism will address the specific forms of anti-Traveller and Roma racism, including hate speech and crime, as experienced by Traveller and Roma children; is afforded a sufficient budget and a clear implementation and monitoring framework; and is implemented in partnership with Traveller and Roma organisations

Best Interest of the Child & Social Security (Articles 3 & 26) - Roma Children & Access to Social Protection: Make Child Benefit a truly universal payment that is not contingent on the fulfilment of the Habitual Residence Condition to ensure Roma children residing in the State are eligible for Child Benefit payments regardless of the legal or administrative status of their parents

CIVIL RIGHTS AND FREEDOMS

Birth Registration and Access to Public Services Cards for Roma Children (Article 7 & 8): Review the implications of the Public Service Cards on Roma, Travellers and other groups experiencing social exclusion and undertake special measures to facilitate access to Public Service Cards, Personal Public Service Numbers and birth registration amongst such groups

Access to Appropriate Information (Article 17) - Digital Inclusion of Traveller and Roma Children: Take special measures to improve the digital inclusion of Traveller and Roma children, parents, and Traveller accommodation sites

VIOLENCE AGAINST CHILDREN (Article 19)

Freedom of the Child from all Forms of Violence – Domestic Violence

- a) Ensure the Third National Strategy on Domestic, Sexual and Gender-based Violence has a robust implementation plan, including clear targets, indicators, outcomes, timeframes and resources related to Traveller and Roma women and children, both through targeted special measures and inclusion in mainstream measures
- b) Ensure Traveller and Roma organisations are actively included and consulted in the work of the forthcoming Domestic, Sexual and Gender-based Violence Agency
- c) Introduce an exemption to the Habitual Residence Condition for women who experience domestic violence

FAMILY ENVIRONMENT AND ALTERNATIVE CARE (Articles 9 & 40)

Traveller Children in Children's Detention Campus and Child Welfare and Protection System

- a) Collect, monitor and use ethnic data in line with a human rights framework regarding Traveller and Roma children's presentation in state detention, care, and child protection and welfare register

- b) Invest in mainstream and targeted measures to address the over representation of Traveller children in detention, state care and the child protection and welfare register

CHILDREN WITH DISABILITIES (Article 23)

- a) Ensure all disability policy is inclusive of specific needs of Travellers and Roma with a disability promoting equality of access, participation and outcomes within the context of a rights based, person centred and social model of disability

BASIC HEALTH AND WELFARE (Article 24, 26 & 27)

Traveller and Roma Children's Health

- a) Publish the National Traveller Health Action Plan with no further delay; establish a clear consultative structure to drive its implementation and monitoring; and ensure all actions in the Plan have clear targets, indicators, outcomes, timeframes and budget lines to addressing Traveller children's health
- b) In line with recommendations arising from the UPR of Ireland and COBs by UNCRC in 2016, take concrete measures to improve Roma children's access to basic healthcare, including measures regarding the issuance of medical cards in Roma communities and improved access to interpretation services

Mental Health among Traveller and Roma Children: Develop the Traveller and Roma Mental Health Action Plan and ensure it is accompanied by a robust monitoring and implementation framework and resources to address the mental health crisis among Traveller and Roma children

Maternal Health and Infant Mortality: Ensure that Traveller and Roma women and children are prioritised and mainstreamed into all existing and forthcoming health policy and service developments related to perinatal and infant health, and undertake special measures with targets to address the health inequalities in access and outcomes for Traveller and Roma women and children in these services

Standard of Living - Traveller and Roma Child Poverty (Article 27&26)

- a) Develop the Traveller and Roma Training, Employment and Enterprise Strategy in a timely fashion in an effort to combat the chronic unemployment levels impacting Traveller and Roma children
- b) Include Traveller and Roma children in mainstream and targeted social inclusion and poverty reduction measures, and allocate targets, indicators, timeframes and adequate human and financial resources to specific programming related to the social inclusion of Traveller and Roma children

EDUCATION, LEISURE & CULTURAL ACTIVITIES (Articles 28-31)

Programme for Government Commitment - National Traveller Education Strategy

- a) Urgently implement the Programme for Government commitment and develop a National Traveller Education Strategy with targets to address the educational disadvantage experienced by Travellers at all educational levels
- b) Ensure the Strategy has a robust implementation and monitoring plan with associated dedicated targets, indicators, outcomes, timeframes and resources as well as a consultative structure to drive its implementation

Measures to Address Racism and Discrimination in Education

- a) Publish and monitor data regarding the use of reduced hours in schools and provide adequate resources for all schools, pupils and Tusla Education Support Services to ensure Traveller, Roma and other children receive the supports they need
- b) Ensure the explicit inclusion of targeted special measures that address anti-Traveller and Roma racism and identity-based bullying in schools, particularly in the forthcoming Action Plan on Bullying and National Action Plan against Racism. Ensure these measures are fully resourced and implemented by all relevant stakeholders

Cultural Rights of Traveller and Roma Children: Ensure that the inclusion of Traveller culture and history in school curriculum takes place in active consultation with Traveller organisations and acts as a precedent for further inclusion of all the cultures which are part of Ireland

SPECIAL PROTECTION MEASURES: ACCOMMODATION & HOUSING OF TRAVELLER & ROMA CHILDREN

- a) Implement all recommendations issued by the Independent Expert Group on Traveller Accommodation with a time lined implementation plan, tangible targets, corresponding accountability measures and budget
- b) Address the housing crisis among Roma by introducing clear actions and associated implementation plan and resources in the next National Traveller Roma Inclusion Strategy

SECTION A. GENERAL MEASURES OF IMPLEMENTATION

1. Comprehensive Policy, Strategy and Coordination

1.1. National Traveller Roma Inclusion Strategy (NTRIS)

We welcomed the inclusion of specific actions related to Traveller and Roma children in Ireland's first NTRIS 2017–2021. However, contrary to the State report (para 318-320) we regret that the NTRIS didn't 'demonstrate strong progress' or 'notable milestones'.⁵ As noted by a number of human rights monitoring bodies,⁶ the implementation of the NTRIS was slow, lacking a robust implementation plan and 'whole of Government' approach where actions related to Traveller and Roma children would have been driven by all state departments and senior level participation. The delayed review of the NTRIS 2017–2021 commenced in June 2022 (para. 320) –subsequently postponing the development of the next NTRIS.

In line with the new EU Roma Strategic Framework 2020-2030 we recommend the State to:

- a) Urgently finalise the review of the current NTRIS 2017–2021 and ensure the now delayed development of the next NTRIS is commenced with no further delay**
- b) Also ensure the next NTRIS has a robust implementation and monitoring plan with clear targets, indicators, outcomes, timeframes and budget lines related to Traveller & Roma children, and that actions are resourced and implemented by all relevant statutory agencies**

1.2 Mainstream Policy and Institutional Developments

Efforts regarding institutional developments have been welcome (para 1-6 of State report), such as mainstreaming a child rights perspective in meeting the SDGs and the development of a National Action Plan under the European Union Child Guarantee.⁷ However, mainstream measures have fallen short on including and implementing special measures, targets and resources towards addressing the situation of Traveller and Roma children. No targets or disaggregated data by ethnicity is available to show the impact of the SDG measures on Traveller and Roma children, and the State's National Action Plan under the EU Child Guarantee has no implementation plan with identified actions or targets to reduce the inequalities faced by Traveller and Roma children.

We recommend the State to:

- a) Introduce a clear implementation plan with targets, indicators and budget lines for Traveller and Roma children in the National Action Plan on Child Guarantee, in measures to progress the SDG goals, and other relevant mainstream policy measures**

2. Allocation of Resources & Equality Budgeting

The resource allocation to the NTRIS 2017-2021 (para.49 State report) was not sufficient and did not define clear budget lines to the actions related to Traveller and Roma children, despite the recommendation by the CRC Committee in 2016 for the State to define such budget lines.⁸ While we appreciate that many targeted programmes supporting disadvantaged children may benefit Traveller and Roma children, we further note with concern that this falls short from the State's commitment to

⁵ The first NTRIS 2017-2021 contained 24 actions that specifically relate to children and youth.

⁶ UNCEDAW, *Concluding Observations on the Combined Sixth and Seventh Periodic Reports of Ireland*, CEDAW/C/IRL/CO/6-7, 9 March 2017; UNCRC, *Concluding Observations on the Combined Third and Fourth Periodic Reports of Ireland*, CRC/C/IRL/CO/3-4 4, 1 March 2016; ECRI, *Fifth Report on Ireland*, CRI(2019)18, 4 June 2019; FCPNM, *Fourth Opinion on Ireland*, ACFC/OP/IV(2018)005, 20 June 2019; CERD, *Concluding Observations on the Combined Fifth to Ninth Reports on Ireland*, CERD/C/IRL/CO/5-9, 12 December 2019; HRC UPR of Ireland 2022; HRC, COBs of Ireland under ICCPR 2022.

⁷ 'National Action Plan for the EU Child Guarantee', 'Delivering Equality of Opportunity in Schools 2017', successor to 'Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People 2014–2020', 'First 5: A Whole-of-Government Strategy for Babies, Young Children and their Families', 'Youth Justice Strategy', 'Sláintecare Healthy Communities', 'Roadmap for Social Inclusion'.

⁸ Para. 15 and 16 (d) by the Committee on the Rights of the Child, *Concluding observations on the combined third and fourth periodic reports of Ireland*, 2016.

resourcing *special measures* to promote and protect the rights of children belonging to Traveller and Roma communities - no matter what the size of the population (para.49 of State Report).

We recommend the State to:

- a) Allocate specific budget lines through the NTRIS and other relevant targeted and mainstream measures to address the human rights situation of Traveller and Roma children**

3. Data Collection & the National Equality Data Strategy

Despite the Concluding Observation in 2016 by the CRC Committee as well as the legislative and policy framework at UN, EU and national levels which set expectations on the State to collect and use equality data,⁹ we regret that progress regarding the collection, disaggregation and use of ethnic data has been slow. While progress has been made with the Central Statistics Office/Census and Pobal to collect, disaggregate and use ethnic data,¹⁰ a number of public agencies and data systems do not collect, use or publish data by ethnicity.¹¹ The Department of Education (para 40 of State Report) collects data by ethnicity on school *enrolment*, however, does not routinely publish or use the data or collect data about school *completion* rates. Only a limited number of surveys, reports and research have provided information about Traveller and Roma children, and regular and robust research and data remains absent.

As a result, government policy, programming and budget decisions are not human rights proofed and we are unable to monitor the situation of children from minority ethnic groups. In this context, we welcome the development of a National Equality Data Strategy and commitment to have this in place from 2023.¹²

We recommend the State to:

- a) Develop and fully implement the National Equality Data Strategy, and as part of this Strategy ensure the full and effective development and implementation of ethnic equality monitoring across all relevant state departments and public bodies. Ensure ethnic equality monitoring takes place in line with human rights standards and that disaggregated data by ethnicity, gender and age is used to equality proof state policies, budgets and programming relating to Traveller and Roma children**

SECTION B. GENERAL PRINCIPLES

4. Non-discrimination (Article 2) - National Action Plan against Racism

The State established an independent Anti-Racism Committee in 2020 to oversee the development of Ireland's National Action Plan on Racism. While we await its publication, we remain unaware of the kind of implementation/monitoring plan and resources to be afforded to actions related to addressing racism experienced by Traveller and Roma children. We also welcome the current revision of Ireland's

⁹ In its previous Concluding Observations, the Committee urged the State to provide disaggregated data to allow monitoring of the situation of Traveller and Roma children; use such data for the formulation, monitoring and evaluation of policies, programmes and projects; and take due note of the framework by the Office of the United Nations High Commissioner for Human Rights regarding defining, collecting and disseminating statistical information. More on national and international basis regarding equality data can be found [here](#).

¹⁰ The Central Statistics Office has included Travellers as an administrative category in the Census since 2006, and Roma was included in Census 2022. Progress has also been made with National Social Inclusion Programmes.

¹¹ Where steps have been taken to disaggregate data by ethnicity by some state agencies, it hasn't always taken place in line with human rights standards. For instance, a small number of public service bodies have introduced ethnic identifiers in their data collection systems, including health services, the Irish Prison Service and Irish Probation Service. However, ethnic categories are not always standardised; ethnic identity is often ascribed to Travellers and Roma by using proxies such as name or looks; and the data is not disaggregated, analysed or provided to stakeholders within an appropriate timeframe and/or used to inform policy/service planning.

¹² Department of Children, Equality, Disability, Integration and Youth, [Minister O'Gorman announces the development of a National Equality Data Strategy](#), 21 March 2022.

hate crime and speech legislation, with the draft General Scheme of the Criminal Justice (Hate Crime) Bill 2021 now including Travellers as one of the protected groups.¹³

We recommend the State to ensure that the forthcoming National Action Plan Against Racism:

- a) will address the specific forms of anti-Traveller and Roma racism, including hate speech and crime, as experienced by Traveller and Roma children**
- b) is afforded a sufficient budget and a clear implementation and monitoring framework**
- c) is implemented in partnership with Traveller and Roma organisations**

5. Best Interest of the Child & Social Security (Articles 3 & 26) - Roma Children & Access to Social Protection

The National Roma Needs Assessment¹⁴ found that 20% of Roma in Ireland are living in 'extreme' poverty and many are unable to access basic social protection. Many Roma are unable to obtain social protection payments due to the way the European Directive 2004/38 on the freedom of movement and residence is implemented.¹⁵ In the Irish context, this requires applicants to meet the Habitual Residence Condition (HRC).¹⁶ The Roma Needs Assessment found that 49.2% of households with children were unsuccessful in their application for social protection payments, and therefore were not receiving Child Benefit (a universal monthly payment for all children in the State) or other crucial supports.

Roma who reported being unsuccessful in their applications had on average lived in Ireland 8 years and cited issues such as a lack of documentation on tenancy and employment history, inability to negotiate an unfamiliar system, and language and literacy barriers as being key obstacles in this regard. 84.4% of Roma also reported feeling discriminated against in getting social welfare, regardless of the success of their application.¹⁷

Under the Public Sector Equality and Human Rights Duty, all public bodies in Ireland have a legal obligation to promote equality, prevent discrimination and protect the human rights of everyone affected by their policies and practices.¹⁸ The Irish Human Rights and Equality Commission¹⁹ has identified that the application of the HRC to Child Benefit is a human rights issue, particularly impacting children from migrant, Roma, and Traveller backgrounds as well as asylum seeking children. It is also contrary to international human rights law. The UN Convention on the Rights of the Child²⁰ prohibits any discrimination between children on the basis of the status of their parents, and requires that all decisions (including social welfare decisions) must have 'the best interests of the child' as a primary consideration.

We recommend the State to:

- a) Make Child Benefit a truly universal payment that is not contingent on the fulfilment of the Habitual Residence Condition to ensure Roma children residing in the State are eligible for Child Benefit payments regardless of the legal or administrative status of their parents**

¹³ The new proposed definition of incitement to hatred also goes further than the current legislation, which at present, has extremely low prosecution levels. In order for the legislation to be effective in preventing and addressing hate speech and hate crimes against minority ethnic children it is necessary for the State to roll out special measures alongside the legislation.

¹⁴ Curran et al., National Roma Needs Assessment, 2018. 50% of Roma households with children reported not always having enough food, 58% of families reported not having enough money for books and uniforms, 1 in 4 Roma children (25%) have gone to school hungry, 39.3% of new mothers do not have supplies such as baby clothes, nappies, and formula, 66.3% of households cannot keep the house warm all the time, 10% of households do not have basic necessities in their accommodation, including a fridge, cooker, or kitchen

¹⁵ European Parliament (2004) [EU Directive 2004/38](#) the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States.

¹⁶ Department of Social Protection, [Habitual Residence Condition](#), 2020.

¹⁷ Pavee Point, [Chapter 7 Employment and Social Protection in National Roma Needs Assessment](#), 2018.

¹⁸ Irish Statute, [Irish Human Rights and Equality Commission Act, 2014](#).

¹⁹ IHREC, Report to the UN Convention on the Rights of the Child, Ireland's combined 3rd and 4th Periodic Report, 2016.

²⁰ OHCHR, [Convention on the Rights of the Child](#), 1989.

SECTION C. CIVIL RIGHTS AND FREEDOMS

6. Birth Registration and Access to Public Services Cards for Roma Children (Article 7 & 8)

Registration of children is a legal requirement and a birth certificate is necessary to enrol children in school and to apply for a passport. To register a birth, parent/s need photo identification and Personal Public Service (PPS) numbers. Roma families often experience difficulties in registering the births of their children due to obstacles such as lack of relevant documentation, English and literacy skills, interpreting services, an understanding of the process and where to go, and awareness of the importance of birth registration.²¹

In 2020, the UN Special Rapporteur on extreme poverty and human rights noted how Ireland's attempt to improve access to welfare benefits and digital government services through its Public Services Card (PSC) is being implemented in ways that gravely prejudice the least well-off. In its official communication to the State, the Rapporteur expressed concerns about the PSC and asked detailed information about its implications.²²

We recommend the State to:

- a) **Review the implications of the PSC on Roma, Travellers and other groups experiencing social exclusion and undertake special measures to facilitate access to PSCs, PPS numbers and birth registration amongst such groups**

7. Access to Appropriate Information (Article 17) - Digital Inclusion of Traveller and Roma Children

According to Census 2016, over half (59.9%) of Travellers do not have access to the internet, this is compared with 18.3% for people in the general population. This figure is likely to be higher as it doesn't represent Travellers who are living on the side of the road or accessing emergency accommodation. Access to digital devices and skills is challenging for many Traveller and Roma families due to the cost of digital equipment and software, low/no literacy and digital skills, and the lack of provision of broadband and/or electricity on some of the Traveller specific accommodation sites. This creates challenges for Roma families with accessing Public Services Cards and Numbers (see section D.1 above), difficulties for Traveller and Roma parents to support their children's school and learning activities, and in accessing and using telehealth services. The digital divide became particularly evident during COVID-19 lockdowns when school closures resulted in remote learning for children.

We recommend the State to:

- a) **Take special measures to improve the digital inclusion of Traveller and Roma children, parents, and Travellers accommodation sites**

SECTION D. VIOLENCE AGAINST CHILDREN (Article 19)

8. Freedom of the Child from all Forms of Violence – Domestic Violence

We regret that actions related to domestic and sexual violence in the context of Traveller and Roma women/children in the National Traveller and Roma Inclusion Strategy (NTRIS) 2017-2021 and the Second National Strategy on DSGBV (2016-2021) were not adequately implemented; the associated implementation plans failed to define or reach clear targets, indicators, outcomes or budget lines; and the inclusion of Traveller and Roma women/children in broader actions was insufficient.²³ While the development of the next NTRIS is delayed (see section A 1.1 of this report), the State published its Third National Strategy on DSGBV in June 2022.

²¹ Curran et al. National Roma Needs Assessment, 2018.

²² UN Human Rights Office of the High Commissioner, [Ireland's Public Services Card discriminates against the marginalised, warns UN rights expert](#), 21 Apr 2020. The Official Communication to the Irish Government by Philip Alston, Special Rapporteur on extreme poverty and human rights [can be found here](#), 14 April 2020.

²³ We welcomed the funding of a small Traveller Domestic and Sexual Violence Pilot Project (NSDGBV) as part of these Strategies.

While we see the potential of the Third National Strategy on DSGBV in addressing DSGBV as experienced by Traveller and Roma women and children, we regret that its associated action plan lacks targets, indicators, outcomes, timeframes and budget lines to do so. The State plans to set up a dedicated DSGBV Agency to drive improvements in this area – it is essential that the agency engages with Traveller and Roma organisations in an active and meaningful way and sees the development and resourcing of special measures to ensure safety and protection of Traveller and Roma women and children.

Roma and Traveller women who are unable to satisfy their right of residence and the Habitual Residence Condition (see section B.5 of this report) are unable to exit violence and access essential emergency and long-term supports, including social housing, housing benefits or basic income supports.²⁴ A number of international human rights bodies have raised concerns about the discriminatory effect of the HRC on Traveller, Roma and other migrant victims of domestic violence.²⁵

We recommend the State to:

- a) Ensure the Third National Strategy on Domestic, Sexual and Gender-based Violence has a robust implementation plan, including clear targets, indicators, outcomes, timeframes and resources related to Traveller and Roma women and children, both through targeted special measures and inclusion in mainstream measures**
- b) Ensure Traveller and Roma organisations are actively included and consulted in the work of the forthcoming Domestic, Sexual and Gender-based Violence Agency**
- c) Introduce an exemption to the Habitual Residence Condition for women who experience domestic violence**

SECTION E. FAMILY ENVIRONMENT AND ALTERNATIVE CARE (Articles 9 & 40)

9. Traveller Children in Children's Detention Campus and Child Welfare and Protection System

We are concerned at the over-representation of Traveller children in state institutions and the child welfare and protection system in Ireland. Although Travellers account for 0.6 % of the Irish population, 22% of young people in Oberstown Children Detention Campus are Travellers.²⁶ An internal study by the Department of Children has found that Traveller children make up 12% of those on the at-risk register for child protection and welfare concerns.²⁷ Considering the over representation of Roma in state care across Europe, we are particularly concerned at the lack of data disaggregated by ethnicity on the representation of both Traveller and Roma children in these systems in Ireland.

We recommend the State to:

- a) Implement ethnic equality monitoring in line with human rights framework regarding Traveller and Roma children's presentation in state detention, care, and child protection and welfare register**
- b) Invest in mainstream and targeted measures to address the over representation of Traveller children in detention, state care and the child protection and welfare register**

²⁴ The right to reside (European Directive 2004/38) and habitual residence condition (HRC) can create additional barriers to seek support and exit violence, particularly for Roma women who experience abuse. See section 5 of this report for information about the right to reside (European Directive 2004/38) and habitual residence condition.

²⁵ UNGA, 2012(63); European Commission against Racism & Intolerance, 2013 (63); CRC, 2015; HRC, 2014; CESCR, 2015 (3).

²⁶ Irish Penal Reform Trust, *Oberstown Children Detention Campus: Key characteristics of young people in detention for Q1 2018*, June 2018.

²⁷ Jack Power, 'At-risk children faced years of delayed before being put on Tusla register', *The Irish Times*, 19 August 2019. No official data by ethnicity is available by Tusla Child and Family Agency or the Department of Children, Equality, Disability, Integration and Youth. However, a report published by Tusla Child and Family Agency estimates that some ethnic groups, like Irish Travellers, are over-represented in the child welfare and protection system. Rooney, C., J. Canavan, UNESCO Child and Family Research Centre NUI Galway, *Exploring ethnic data collection for the Child and Family Agency*, Tusla Child and Family Agency, 2019.

SECTION F. CHILDREN WITH DISABILITIES (Article 23)

10. Traveller and Roma Children with Disabilities

Travellers are more likely to experience disability than the general population, with almost 1 in 5 Travellers categorised as having a disability.²⁸ Traveller children with a disability share the concerns of the broader disabled community as well as concerns specific to their experience as disabled Travellers.²⁹ There is a dearth of data on the specific experiences of Traveller children with a disability, particularly in terms of access and outcomes in service provision.

We recommend the State to:

- a) Ensure all disability policy is inclusive of specific needs of Travellers and Roma with a disability promoting equality of access, participation and outcomes within the context of a rights based, person centred and social model of disability**

SECTION G. BASIC HEALTH AND WELFARE (Article 24, 26 & 27)

11. Traveller and Roma Children's Health

In previous observations by UN treaty monitoring bodies, Ireland has been asked to take concrete measures to guarantee that Traveller and Roma children enjoy the same access to and quality of health-care services as others, including taking measures regarding issuance of medical cards in Traveller and Roma communities. However, the State has failed to take concerted action to address Traveller and Roma health inequalities and continue to adopt a 'mainstreaming approach' which ignores disparities in health outcomes. As a result, Traveller and Roma children continue to experience stark health inequalities when compared to the majority population.³⁰

While the National Traveller Roma Inclusion Strategy (para 215 & 317 of State report) included health related actions, their implementation and resourcing was poor (see section A 1.1 of this report). The long awaited publication of the National Traveller Health Action Plan, which was to be published in 2018, is now set to be published in September this year. While this is welcomed, there is a need to ensure all actions in the Plan have clear targets, indicators, outcomes, timeframes and budget lines. Roma also face additional barriers such as an absence of sustainable funding for a Roma health infrastructure as well as lack of access to medical cards, interpretation and translation supports.

We recommend the State to:

- a) Publish the National Traveller Health Action Plan with no further delay; establish a clear consultative structure to drive its implementation and monitoring; and ensure all actions in the Plan have clear targets, indicators, outcomes, timeframes and budget lines to addressing Traveller children's health**
- b) In line with recommendations arising from the UPR of Ireland and COBs by UNCRC in 2016, take concrete measures to improve Roma children's access to basic healthcare, including measures regarding the issuance of medical cards in Roma communities and improved access to interpretation services**

12. Mental Health among Traveller and Roma Children

In 2020 the State committed to developing a Traveller and Roma Mental Health Action Plan but we regret this has not been progressed. The State Report refers to a data source which shows an

²⁸ CSO, [Census of Population 2016 – Profile 8 Irish Travellers, Ethnicity and Religion](#), 2016.

²⁹ Such as isolation from and within their own community, inappropriate and inadequate service provision, inappropriate and inadequate accommodation, and racism and discrimination.

³⁰ Infant mortality rate for Travellers is 3.5 times the rate of the general population and Traveller suicide rate is 6 times higher than general population, in Kelleher et al., 2010. Within the 15-24 age bracket, mortality rates for Travellers are also notably higher, Department of Children and Youth Affairs, [Statistical Spotlight #4: Young Travellers in Ireland](#), 2020. Over 1 in 3 (38.9%) of Roma do not have a family doctor/general practitioner, in Curran et al., 2018.

‘improvement in the rate of suicide across all groups, and adolescents aged 15-19’ (para 104 – no source for data provided). This contradicts available data and knowledge regarding the mental health crisis within the Traveller and Roma communities. Recently published data indicates that Travellers have higher rates of suicide-related ideation and self-harm than non-Travellers,³¹ while research has shown that suicide rate among Travellers is 6 times higher than the general population, accounting for approximately 11% of all Traveller deaths.³² The suicide rate for Traveller men is 7 times higher than the general population and most common among young Traveller men aged 15-25.³³ We are particularly concerned about the impact of COVID-19 on Travellers' mental health, which was at crisis point before the pandemic.

We recommend the State to:

- a) Develop the Traveller and Roma Mental Health Action Plan and ensure it is accompanied by a robust monitoring and implementation framework and resources to address the mental health crisis among Traveller and Roma children**

13. Maternal Health and Infant Mortality

Traveller babies are three times more likely to die in their first year than infants in the general population, even though 98% of Traveller women avail of maternity services.³⁴ In its 2016 report, the UNCRC urged Ireland to strengthen its efforts to promote breastfeeding, with particular measures for the Traveller community. With only 2.2%³⁵ of Traveller women initiating breastfeeding, the need for positive action measures to support Traveller breastfeeding remains relevant.

Roma women face additional barriers in accessing maternal health services in Ireland. The National Roma Needs Assessment found that almost a quarter of Roma women in Ireland did not attend a doctor or hospital while pregnant and first accessed a hospital to give birth.³⁶ This was largely due to a lack of access to primary health care and accessible maternal health information. It was also reported that almost 40% of Roma women could not afford basic supplies, such as baby clothes or nappies when attending the hospital to give birth.

We recommend the State to:

- a) Ensure that Traveller and Roma women and children are prioritised and mainstreamed into all existing and forthcoming health policy and service developments related to perinatal and infant health and undertake special measures with targets to address the health inequalities in access and outcomes for Traveller and Roma women and children in these services**

14. Standard of Living - Traveller and Roma Child Poverty (Article 27&26 - see section B5 of this report)

In 2016, the UNCRC expressed deep concern about child poverty disproportionately impacting Traveller and Roma children. These concerns persist as 80.2% of Travellers and 83.3% of Roma face

³¹ Kavalidou, K., Daly, C., McTiernan, N. and Corcoran, P., Incidence of self-harm and suicide-related ideation among the Irish Traveller indigenous population: evidence from a national emergency department service. National Suicide Research Foundation WHO, 2021. Collaborating Centre on Surveillance and Research in Suicide Prevention University College Cork, Ireland

³² Kelleher et al., *All Ireland Traveller Health Study*, 2010,

³³ Ibid. Suicide for Traveller women is 5 times higher than the general population; with 6 out of 10 (62.7%) Traveller women disclosing that their mental health was not good enough for one or more days in the last 30 days; this was compared to 1 in 5 (19.9%) women in general population.

³⁴ Infant mortality rate for Travellers is 3.7 times the national rate, Neonatal mortality rate for Travellers is almost 2 times the EU average, in Kelleher et al., 2010.

³⁵ Kelleher et al., 2010.

³⁶ Curran et al., *National Roma Needs Assessment*, 2018.

unemployment;³⁷; 25% of Roma children report to have gone to school hungry; and 57.5% of Roma do not have enough money for school books and uniforms.³⁸

Yet the State has not introduced adequate poverty reduction measures regarding Traveller and Roma children. There are no dedicated targets for reducing Traveller and Roma poverty in key mainstream policy initiatives related to poverty, social inclusion or employment, including the Roadmap for Social Inclusion,³⁹ and while the Government has committed to the development of a Traveller and Roma Training and Employment Plan, no dedicated strategy has been developed to date to address the significant levels of unemployment faced by Travellers and Roma.⁴⁰

We recommend the State to:

- a) Develop the Traveller and Roma Training, Employment and Enterprise Strategy in a timely fashion in an effort to combat the chronic unemployment levels impacting Traveller and Roma children**
- b) Include Traveller and Roma children in mainstream and targeted social inclusion and poverty reduction measures, and allocate specific targets, indicators, timeframes and adequate human and financial resources to specific programming related to the social inclusion of Traveller and Roma children**

SECTION H. EDUCATION, LEISURE & CULTURAL ACTIVITIES (Articles 28-31)

15. Programme for Government Commitment - National Traveller Education Strategy

Early years: available official data suggests that Traveller and Roma children are availing of early years care and education.⁴¹ However, evidence from Traveller and Roma organisations show significant issues with access and engagement with early years services.

Primary education: Virtually all Traveller children aged 3-13 years are enrolled in primary schools. However, attendance and attainment levels are weighted towards the poorer end of the spectrum

Post-primary/secondary education: Travellers' engagement with post-primary schooling is fragile and needs urgent measures. 33% of Travellers are enrolled in upper secondary education in comparison with over 90% of the State population in the same age band.⁴² According to the latest Census, only about 20% of Travellers aged 20-24-years have completed the Senior Cycle.⁴³

Youth work and out of school leisure and cultural activities: These services are essential for young Travellers and Roma and need to be delivered in appropriate and inclusive ways with Travellers themselves involved at all stages of development and implementation. Little data and evidence is available regarding this

Digital divide: Increased use of digital technologies in teaching, learning and assessment poses significant difficulties for many Traveller and Roma children and their parents (see section C.7 of this Report). 60% of Travellers do not have access to the internet, in comparison with 18% of people in the general population - the figure does not capture those Travellers who are living on the side of the road or accessing emergency accommodation⁴⁴

³⁷ Central Statistics Office, *Census 2016 Profile 8 - Irish Travellers, Ethnicity and Religion*, 2016.

³⁸ Curran et al., *National Needs Assessment*, 2018.

³⁹ The Pathways to Work Strategy 2016-2020, Future Jobs Ireland 2019, *Future Jobs Ireland- 2019- Preparing Now for Tomorrow's Economy*, Department of the Taoiseach and the Department of Business, Enterprise and Innovation, 2019.

⁴⁰ 55% of Travellers have experienced discrimination at work, Kelleher et al., *All Ireland Traveller Health Study*, 2010, and 80.2% of Travellers are unemployed, Central Statistics Office, *Census 2016 Profile 8 - Irish Travellers, Ethnicity and Religion*, 2016. 78.9% of Roma feel discriminated against in getting a job and only 16.7% of Roma are employed, in Curran et al., *National Needs Assessment*, 2018. Roma who do not meet the right to reside or Habitual Residence Condition are not considered job seekers and therefore are not eligible for many training and employment supports.

⁴¹ Pobal, *Annual Early Years Sector Profile Report 2020/2021*, May 2022.

⁴² Central Statistics Office, *Census 2016, Profile 8 - Irish Travellers Ethnicity and Religion*. Tables E8014 and E8023.

⁴³ Ibid.

⁴⁴ Central Statistics Office, *Census 2016 Profile 8 - Irish Travellers, Ethnicity and Religion*, 2016.

In 2016, the Committee urged the State to undertake concrete and comprehensive measures to address structural discrimination against Traveller and Roma children with regard to access to education. Since then, we have welcomed the explicit targeting of Traveller participation in the *National Plan for Equity of Access to Higher Education 2015-2021* (para 314 of State Report), as well as its successor which will see the target for Travellers further increased.⁴⁵ However, none of the mainstream educational strategies contain targets aimed directly at increasing Traveller or Roma participation at early years, primary or post-primary levels. The inequalities and exclusion faced by Traveller and Roma children in education, early childhood education and care are now exacerbated by the differential effects of COVID-19.⁴⁶ The development of a National Traveller Education Strategy, now a Programme for Government commitment, remains an urgent and outstanding priority.⁴⁷ The State has indicated that a consultation process for its development would be initiated by the end of this year – however, we remain concerned at the timeframe for realising this.

We recognise that a number of small initiatives (including a pilot programme which covers four geographical locations, para. 314 State report) have been introduced but remain concerned at the limitations in terms of their geographical scope, outcomes and sustainability. While Delivering Equality of Opportunity In Schools (DEIS) sets a vision for the State to improve education opportunities for communities at risk of social exclusion and provides funding for DEIS schools, many Travellers do not attend DEIS schools and do not benefit from the supports of DEIS schools. In 2020–21, at primary school level 4,234 Traveller pupils were in DEIS schools and 3,914 in non-DEIS schools. At post-primary level, 48.6% of Travellers were in DEIS schools.⁴⁸

We recommend the State to:

- a) Urgently implement the Programme for Government commitment and develop a National Traveller Education Strategy with targets to address the educational disadvantage experienced by Travellers at all educational levels. Ensure the Strategy has a robust implementation and monitoring plan with associated dedicated targets, indicators, outcomes, timeframes and resources as well as a consultative structure to drive its implementation**

16. Measures to Address Racism and Discrimination in Education

Since its last examination of the State party, there has been a growing trend in the use of ‘reduced timetables’ at primary and secondary level schools whereby Traveller children have been placed on reduced hours during school days but are marked as ‘present’. Cutting children’s school hours has been used as a tool to manage behavioural issues related to health, emotional or behavioural issues or conditions, such as ADHD, when schools lack the necessary resources to support children who need additional assistance.⁴⁹ In May 2019, the Oireachtas Joint Committee on Education and Skills noted a concern for a lack of data collected by the State on the use of reduced timetables, and called for extra resources to be made available to children at risk or in need of assistance.⁵⁰ We welcome the

⁴⁵ Higher Education Authority, [National Plan for Equity of Access to Higher Education 2015-2019](#). The former NAP set a target of 80 full-time Traveller students in higher education, increasing Traveller participation from 35 in 2015 to 61 in 2018/19. The next iteration of the NAP is due to set the target at a higher level. A number of special measures have supported Traveller participation in HE, providing a model for supports for Travellers at other educational levels.

⁴⁶ Pavee Point and the National Traveller Women’s Forum, [The Implications of COVID-19 for Traveller and Roma transfer to and progression within Higher Education. Report on National Forum, May 2020](#). This has left Traveller and Roma learners at all levels attempting to undertake home study in the context of very difficult living conditions and often without access to WiFi or technology.

⁴⁷ Government of Ireland, [Programme for Government: Our Shared Future](#), 29 Oct 2020.

⁴⁸ Data released by Department of Education Social Inclusion Unit, NTRIS Committee: Education updates and developments, 27 June 2022

⁴⁹ Amin, N., R. Fay, L. Kavanagh, K. Lawrence (eds), *Traveller Health Needs Assessment: County Clare*, Pavee Point Traveller and Roma Centre and Mid West Traveller Health Unit (THU), 2019.

⁵⁰ Joint Oireachtas Committee on Education and Skills, [Report on the Committee’s examination on the Progression of Travellers from primary-, to Secondary- and Third-Level Education](#), 2019.

guidelines issued to schools at the beginning of this year regarding the use of reduced hours in schools as well as the inclusion of ethnic identifiers in the forms used to report the use of reduced hours. The State had indicated an intention to publish this data in the middle of this year, however, this data has not yet been published.

Our organisations are also concerned at the experiences of exclusion, racism and identity based bullying of Traveller and Roma children in schools, both by their peers and teachers.⁵¹ In this context, we welcome the development of the National Action Plan against Racism (*see section B.4 of this report*) due to be published, and the review of the Action Plan on Bullying and Anti-bullying Procedures in primary and post-primary schools.

We recommend the State to:

- a) Publish and use data regarding the use of reduced hours in schools and provide adequate resources for all schools, pupils and Tusla Education Support Services to ensure Traveller, Roma and other children receive the supports they need**
- b) Ensure the explicit inclusion of targeted special measures that address anti-Traveller and Roma racism and identity-based bullying in schools, particularly in the forthcoming Action Plan on Bullying and National Action Plan against Racism. Ensure these measures are fully resourced and implemented by all relevant stakeholders**

17. Cultural Rights of Traveller and Roma Children

We acknowledge the positive developments taking place in relation to including Traveller culture and history in the school curriculum which holds potential to create a more inclusive school environment for Travellers (para.314). However, to ensure effective implementation upon their enactment, steps must be taken to ensure that policy and practice in schools are in line with interculturalism, anti-discrimination and anti-racism, and that they explicitly focus on Travellers.

We recommend the State to:

- a) Ensure that the inclusion of Traveller culture and history in school curriculum takes place in active consultation with Traveller organisations and acts as a precedent for further inclusion of all the cultures which are part of Ireland**

I. SPECIAL PROTECTION MEASURES: CHILDREN BELONGING TO MINORITY GROUPS

18. Accommodation & Housing of Traveller & Roma Children

- 2021 investigation of a Local Authority run Traveller halting site by Ombudsman for Children's Office (OCO) found a number of serious issues, including inadequate sanitation, extreme overcrowding, persistent rodent infestations, inadequate heating systems, unsafe electrical works and a high rate of childhood illness caused by the living conditions. The investigation found that the Local Authority failed to consider the best interests of the children and did not meet their obligations in relation to Traveller accommodation provision⁵² - Substandard accommodation conditions, lack of access to electricity,

⁵¹ Traveller parents report that their children experience exclusion and racist name-calling, the majority of Traveller and Roma students say that bullying and racist name-calling is not taken seriously when they report it to school staff, bullying by teachers is also cited as one of the most frequent types of bullying that Traveller students experience, in Quinlan, M., [Out of the Shadows - Traveller and Roma Education - Voices from the Communities](#), 2021. 12.% of Travellers surveyed indicated that they had been bullied by teachers several times a week at some point in the past year, including verbal abuse and exclusion, in Dupont, M., [A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system](#), 2022. Curran et al., National Roma Needs Assessment, 2018, highlights how Roma respondents had to hide their identity to prevent or protect themselves against bullying and discrimination, both by peers and by school staff.

⁵² The Ombudsman for Children's Office (OCO), [No End in Site; An investigation into the living conditions of children living on a local authority site](#), May 24 2021. A Traveller Advocacy Group (TAG) initially contacted the Ombudsman for Children's Office (OCO) in 2018 about conditions at the local authority run halting site. Eleven families then came forward and made complaints about persistent problems. Other problems reported included safety concerns about access to the site; illegal

running water, sewage facilities amongst others continue to be issues on Traveller specific accommodation sites

- 39% of Travellers, in comparison to 6% of the general population, meet the European definition of homelessness⁵³
- Many Travellers are forced into standard social housing or private rented accommodation due to lack of Traveller specific accommodation provision
- A recent Equality Review⁵⁴ by the Irish Human Rights and Equality Commission shows that between 2008 and 2018, only 2/3 of the allocated (€168.8 million) budget for Traveller accommodation was drawn down by Local Authorities.⁵⁵
- Roma face discrimination in accessing accommodation, severe overcrowding, poor and dangerous accommodation conditions, homelessness, and lack of access to social housing and rent supplement. In 2018, 6.6% of Roma respondents reported to be homeless and almost half had been homeless at some stage – the figure today is estimated to be significantly higher. 1 in 5 Roma (24%) lived in households of 8 or more people and almost half (44.8%) of Roma did not have enough beds in their accommodation⁵⁶

Serious concerns have been raised over the Housing (Traveller Accommodation) Act 1998 and the Housing (Miscellaneous Provisions) Act 2002 by a significant number of human rights bodies.⁵⁷ In 2019, an Independent Expert Group on Traveller Accommodation⁵⁸ made 32 recommendations for the Government and a Programme Implementation Board has since been established to progress the implementation of the recommendations (para 276 of State report). However, implementation has been slow - 6 of the 32 recommendations have been completed and there are currently no timelines or supports identified for progressing the remaining recommendations.

For the first time since 2014, the full available Traveller accommodation budget was drawn down in 2020 and again in 2021 but it was spent on maintenance of existing Traveller accommodation and COVID-19 mitigation measures. No new accommodation or units were provided despite the fact that 39% of Travellers are homelessness.

Accommodation and homelessness are key issues impacting on the Roma community in Ireland. While the State has indicated a commitment to include Roma specific housing actions in the National Traveller Roma Inclusion Strategy (NTRIS), there are currently no such actions in the NTRIS.

We recommend the State to:

- a) Implement all recommendations issued by the Independent Expert Group on Traveller Accommodation with a time lined implementation plan, tangible targets, corresponding accountability measures and budget**
- b) Address the housing crisis among Roma by introducing clear actions and associated implementation plan and resources in the next National Traveller Roma Inclusion Strategy**

dumping nearby; inconsistent and inadequate waste disposal; a lack of safe play areas for children and housing applications not being progressed.

⁵³ Pavee Point, [The Traveller Community and Homelessness](#), 2021. European Typology of Homelessness and housing exclusion-ETHOS) - this includes the large number of Travellers who experience 'hidden homelessness' in overcrowded living conditions.

⁵⁴ IHREC, [Accounts of First Council by Council Equality Review of Traveller Accommodation](#), 2021.

⁵⁵ In 2019, the Commission invited each of the 31 local authorities in the State to undertake a review of their provision of Traveller accommodation. The local authorities were invited to conduct a review of the practices, procedures and other relevant factors in relation to the drawdown of capital funding and the provision of Traveller-specific accommodation services, IHREC, [Equality Review- Provision of Traveller Accommodation by Local Authorities](#), 2021.

⁵⁶ The application of the Habitual Residence Condition and the Housing Circular 41/2012 is precluding many Roma from accessing a range of social welfare supports, including housing and homeless supports. Curran et al., *National Needs Assessment*, 2018.

⁵⁷ UNCRC, 2016; HRC, 2014; , CESCR 2015; CEDAW, 2017; FCNM, 2019; ECRI, 2019; CERD, 2019; HRC UPR of Ireland, 2022; Council of Europe's Commissioner for Human Rights, Nils Muižnieks, 2016.

⁵⁸ Independent Expert Group on behalf of the Minister of the Department of Housing, Planning and Local Government, [Traveller Accommodation Expert Review](#), 2019.