



PAVEE POINT
TRAVELLER AND ROMA CENTRE

The Traveller Community and Homelessness

ADVOCACY PAPER: OCTOBER 2021



“ Following years of marginalisation and poor living conditions, Travellers continue to experience higher levels of chronic disease such as asthma, stroke, heart disease and respiratory disease, making them in our present conditions so much more vulnerable to COVID-19. Overcrowding in housing remains prevalent [...] Approximately 3,000 Travellers live in unofficial sites or on the side of the road without access - in 2021 - to running water, electricity and toilets. This makes current advice as to self-isolation and handwashing so much more difficult.

We have not all suffered COVID-19 equally. It is now accepted that poor people have suffered disproportionately from the pandemic. Among those poor, Roma and Travellers have been even further impacted. We are well past the time for achieving improvements in the conditions of Roma and Traveller communities. Is it not time to look at the obstacles – avoidable obstacles – to the advancement of these communities in the education system and the structural inequalities that impede Traveller and Roma citizens from the achievement of full and inclusive participation in our Republic? Let us accept that we are dealing with rights issues. On such an important issue, surely a political consensus is not only desirable, but achievable. ”

President marks International Traveller & Roma Day 2021 (President Michael D. Higgins, President of Ireland, 2021)

Traveller Homelessness in Ireland: A Community in Crisis

This advocacy paper has been prepared by Pavee Point Traveller and Roma Centre (hereafter Pavee Point) in response to the disproportionate and ever-growing numbers of Travellers who are currently homeless or are at-risk of becoming homeless in Ireland.

The unprecedented nature of the worsening housing and homeless crisis in Ireland presents the starkest backdrop to the current accommodation situation for Travellers. Travellers are significantly marginalised in terms of access to adequate, safe and culturally appropriate accommodation and related supports and experience high levels of discrimination in access to accommodation.¹ The impacts of COVID-19 have also further exacerbated this pressing issue for many Travellers.

In 2016, Pavee Point presented to the Joint Oireachtas Committee on Housing and Homelessness² and at this forum, we highlighted that although representing less than 1% of the population, Travellers constitute a disproportionate number of those experiencing homelessness in Ireland. In spite of this, Travellers are invisible within all national policy frameworks and government responses related to homelessness.

In the presentation³, a number of issues were raised with the Committee, including:

- Lack of delivery of Traveller-specific accommodation coupled with the lack of provision for affordable housing /over-reliance on the private sector was effectively pushing Traveller families into homelessness;
- The multiple forms of Traveller homelessness, including Traveller families living in severely overcrowded and inhabitable sites (often doubling/trebling up), living on the side of the road or accessing emergency accommodation;
- Lack of recognition of Traveller homelessness in policy and service provision;
- The impact of racism and discrimination on Traveller homelessness, particularly in relation to the private rental sector;
- The impact of homelessness on Traveller health, including the health and well-being of children; and
- The lack of implementation of ethnic equality monitoring across housing/homelessness datasets

We warned that unless this was urgently addressed with targeted actions, the homeless crisis within the community would significantly worsen. The purpose of this advocacy paper is to give visibility and increase awareness about the Traveller homelessness crisis and to:

- Provide context to Traveller homelessness in Ireland;
- Document the nature, extent and factors leading to Traveller homelessness;
- Highlight the impact of homelessness on Traveller families, especially the impact on Traveller health;
- Examine the impact of COVID-19 on Traveller homelessness;
- Identify good practices and opportunities for preventing Traveller homelessness; and
- Make recommendations for improved policy development and service provision.

The paper seeks to inform the development of strategic and advocacy actions which are required to address this urgent issue.

In 2019, Pavee Point commissioned research to document the extent and reality of Traveller homelessness in Ireland and examine the impact of homelessness on Traveller health.⁴

1 Russell, H., Privalko, I., McGinnity, F. and Enright, S. (2021) [Monitoring Adequate Housing in Ireland](#). Dublin: Economic and Social Research Institute and the Irish Human Rights and Equality Commission.

2 Pavee Point Traveller and Roma Centre (2016) [Pavee Point opening statement to Oireachtas Committee on Housing and Homelessness](#). Dublin: Pavee Point Traveller and Roma Centre

3 See our opening statement, [Pavee Point Presentation to the Oireachtas Committee on Housing and Homelessness](#) and Pavee Point Traveller and Roma Centre (2016) Submission to the Oireachtas Committee on Housing and Homelessness. Dublin: Pavee Point

4 The research was carried out in 2020 and data was gathered through desk research, consultations with Travellers, Traveller organisations and key stakeholders (statutory, voluntary, NGO, academic) in the field.

Findings from this commissioned research confirm what Pavee Point, other Traveller organisations, Travellers and previous research have consistently reported: deteriorating site conditions, severe overcrowding, and Travellers living in insecure and unsafe accommodation. The commissioned research suggests that approximately 39% of Travellers meet the European definition of homelessness (European Typology of Homelessness and housing exclusion-ETHOS)⁵ as this includes the large number of Travellers who are experiencing 'hidden homelessness' in overcrowded living conditions. This is compared to 6% of the general population.

Drawing on the commissioned research and a range of national, European and UN policy documents, this advocacy paper examines the Traveller homeless crisis in Ireland. Further research will be required to fully examine the impacts of the housing and homeless crisis on the Roma community in Ireland and to capture a comprehensive picture of the homeless crisis within specific cohorts and identity groups in both Traveller and Roma communities (particularly women, children, LGBTQI+ and disability). We know these are significant concerns that require further exploration and specific actions to address homelessness and accommodation issues facing both Traveller and Roma communities.

Given the disproportionate number of Travellers experiencing homelessness, including those sleeping rough and accessing emergency accommodation,⁶ specific measures and actions will be required to ensure the reduction and prevention of homelessness within the community. Pavee Point welcomes the commitment by the Government to prioritise the delivery and improvement of Traveller accommodation⁷ in addition to the Government's ambitious goal of reducing and preventing homelessness in Ireland by 2030.⁸ This must also include the reduction and prevention of Traveller homelessness.

PAVEE POINT RECOMMENDS THE FOLLOWING KEY RESPONSES TO THE TRAVELLER HOMELESS CRISIS:

Department of Housing, Local Government and Heritage, to:

- Ensure full implementation of recommendations by the Expert Group on Traveller accommodation, including overhauling legislation and policies which negatively impact on accommodation provision for Travellers.
- Apply and implement in policy, and practice, the ETHOS definition which has been accepted as the standard tool of definition and measurement across almost all European countries.
- Build on the welcome references to Travellers and Traveller homelessness in *Housing For All*⁹ by naming Travellers as a priority group in mainstream housing/homeless strategies and ensuring that the needs of Travellers are met through clear targets, actions, and resources to address Traveller accommodation and homelessness issues.
- Include clear actions on addressing Traveller homelessness in Traveller specific policy, including the next iteration of the National Traveller and Roma Inclusion Strategy and the elaboration and implementation of Traveller Accommodation Plans (TAPs).

5 The ETHOS is a comprehensive framework that captures the complexity of homelessness and includes: rooflessness, houselessness, living in insecure accommodation, and living in inadequate accommodation. It people who are (1) sleeping rough; (2) in emergency accommodation, such as overnight shelters; (3) in accommodation for the homeless (e.g. hostels, shelters, refuges, transitional); (4) in institutions with no housing to which to go subsequently (e.g. release from prisons, medical institutions); (5) forced to live in temporary structures (including mobile homes/trailers), due to lack of housing and/or appropriate provision of accommodation; (6) forced to live with family or friends due to lack of housing, not own residence (e.g. 'couch-surfing')

6 Data sourced from - Department of Children, Equality, Disability, Integration and Youth (DCEDIY) (2020) [Young Travellers in Ireland Includes some data on Young Roma](#). Dublin: Department of Children, Equality, Disability, Integration and Youth. See Table 20.

7 Department of Housing, Local Government and Heritage (2021) *Housing for All - a New Housing Plan for Ireland*. Dublin: Department of Housing, Local Government and Heritage.

8 Department of Housing, Local Government and Heritage (2021) *Housing for All - a New Housing Plan for Ireland*. Dublin: Department of Housing, Local Government and Heritage.

9 *Housing for All - a New Housing Plan for Ireland*, is Ireland's newest housing/homelessness strategy released in September 2021. See Department of Housing, Local Government and Heritage (2021) *Housing for All - a New Housing Plan for Ireland*. Dublin: Department of Housing, Local Government and Heritage.

- At a minimum, include the following targets in the new National Traveller and Roma Inclusion Strategy as set out in the EU Traveller and Roma strategic framework for equality, inclusion and participation for 2020 – 2030.¹⁰
 - Cut the number of Travellers sleeping rough and using emergency accommodation in half by 2030
 - Cut Traveller overcrowding in half by 2030
 - Ensure 95% of Travellers have access to tap water in their dwelling by 2030
 - Reduce Traveller accommodation deprivation by 1/3 by 2030
- Implement ethnic equality monitoring, including the introduction of a standardised ethnic identifier in line with the national census, across all statutory and voluntary housing and homeless datasets under their remit. This includes datasets for social housing and accommodation, allocations of social housing and accommodation and on homelessness.
- Ensure adequate funding allocated to Local Authorities to meet their targets in Local Traveller Accommodation Plans and put in place monitoring mechanisms to ensure the accommodation needs of Travellers are met.
- Ensure proportionate amount of the allocated Traveller accommodation budget to the development of new Traveller-specific accommodation.
- Place a moratorium on Traveller evictions and the decommissioning of Traveller-specific accommodation until the accommodation needs of Travellers on Local Authority Housing Lists are met.
- Appoint a National Accommodation Lead (at Senior Level) for Travellers given the disproportionate rates of homelessness.
- Provide multi-annual funding to address Traveller homelessness through:
 - Establishment of regional pilots with dedicated posts within local Traveller organisations to provide homeless and accommodation advice and supports, and to engage with relevant state and voluntary bodies at local and national level; and
 - Traveller specific support workers working within relevant mainstream homeless services.
- Establish joint liaison mechanisms with the Department of Health at national level to address the current and emerging Traveller health inequalities that are compounded by homelessness.
- Ensure that Traveller health and homelessness is addressed bi-annually (at a minimum) by the NTACC and actions identified to address key and emerging issues.
- Ensure full implementation of Housing For All, specifically:
 - In line with Actions 3.11, 3.12 and 3.13 on the health of people who are homeless, include specific measures to support inclusion of Travellers who are homeless in partnership with Traveller organisations.
 - In line with Action 3.8 ensure that guidance is issued to Local Authorities on their Homeless Action Plans prepared under section 37 of the Housing (Misc. Provisions) Act 2009, includes specific guidance on the needs of Travellers who are homeless in partnership with Traveller organisations.
- Introduction of a robust monitoring and evaluation framework to ensure the full expenditure of funds allocated to Local Authorities for Traveller-specific accommodation.
- Ensure that any research on homelessness and accommodation commissioned by the Department explicitly includes the needs of Travellers.
- Undertake an equality impact assessment on the disproportionate impact of HAP on Traveller families.
- Commission intersectional research into the prevalence and consequences of homelessness on Traveller women and children.

¹⁰ European Commission (2020) [Communication from the Commission to the European Parliament and the Council: A Union of Equality: EU Roma strategic framework for equality, inclusion and participation](#). Brussels: European Commission.

Local Authorities, to:

- Report on, and undertake specific actions to address Traveller homelessness in future Traveller Accommodation Programmes (TAPs).
- Align and integrate the Traveller Accommodation Programme (TAPs) targets and actions with actions in Local County and City Development Plans and the Action Plans prepared under Section 37 of the Housing (Misc. Provisions) Act 2009.
- Make provision for current and projected Traveller population and accommodation requirements to ensure that Traveller families are not subjected to long-term homelessness.
- Work in partnership with the HSE Public Health and Traveller Health Units to undertake a health equality impact assessment to inform the development and implementation of Traveller Accommodation Programmes (TAPS).
- Mandate anti-racism and discrimination training for all staff in compliance with Section 42, Irish Human Rights and Equality Act (2014).

Section 1: Defining Homelessness



The concept of homelessness is not static; it is multifaceted and complex, with various pathways in and out of homelessness for different individuals and groups. Historically, the concept of homelessness was only associated with the most visible forms of homelessness such as those sleeping rough, and broadly understood by policymakers and researchers as an issue predominantly impacting single men.¹¹ This definition completely failed to acknowledge the complexity of homelessness. This includes those who do not have secure accommodation and are forced to live in precarious situations such as staying in homeless accommodation, living in family hubs or domestic violence accommodation, 'couch-surfing' with friends and family, living in abandoned buildings, and for many Travellers, being forced to live on the side of the road without access to basic facilities. It also didn't consider the needs of number of diverse groups, including families, women, children, Travellers and Roma, migrants, ex-prisoners, people with disabilities, LGBTQI+ and other identity or legal status groups. By now, this approach to homelessness has largely been recognised both nationally and internationally as too narrow in scope and most European countries have adjusted application of the term in both legislation and in policy.

¹¹ See for example: O'Sullivan, E. and M. Higgins (2001) Women, the welfare state and homelessness in the Republic of Ireland. In B. Edgar and J. Doherty (Eds) Women and Homelessness in Europe: Pathways, services and experiences. Bristol: The Policy Press. 77-89; and Mayock, P., Parker, S. and Sheridan, S. (2015) Women, Homelessness and Service Provision. Dublin: Simon Communities in Ireland.

Ireland formally introduced its first legislative definition of homelessness with the Housing Act, 1988 following the work of a coalition of voluntary organisations, organized as the National Campaign for the Homeless. Section 2 of Act states that a person should be considered to be homeless if:

- a. there is no accommodation available which, in the opinion of the authority, he, together with any other person who normally resides with him or who might reasonably be expected to reside with him, can reasonably occupy or remain in occupation of; or
- b. he is living in a hospital, county home, night shelter or other such institution, and is so living because he has no accommodation of the kind referred to in paragraph (a); and
- c. he cannot provide accommodation from his own resources.

This definition seems to keep a focus on male homelessness (using he/him throughout) which does not reflect the current reality, where over 40% of people experiencing homelessness are now women¹². It also fails to name many of the specific forms of homelessness which are currently impacting people in Ireland.

While there is no universally accepted definition of homelessness, the European Commission has urged Member States to adopt the European Typology of Homelessness and Housing Exclusion (ETHOS) definition of homelessness to ensure a common European wide understanding of the term.¹³ This is particularly pertinent given that there are a number of variations regarding the way in which homelessness is defined across Europe and the increase of homelessness and housing exclusion amongst Member States, including Ireland. The European Federation of organisations working with the people who are homeless (FEANTSA) developed this typology in 2005 to improve the understanding and measurement of homelessness in Europe and to provide a common understanding of homelessness across Member States. The ETHOS encompasses both homelessness and housing exclusion as they are intrinsically linked. The ETHOS is a comprehensive framework that captures the complexity of homelessness and includes: rooflessness, houselessness, living in insecure accommodation, and living in inadequate accommodation, as such, it includes the following categories of people who are:

1. Sleeping rough
2. In emergency accommodation, such as overnight shelters
3. In accommodation for the homeless (e.g. hostels, shelters, refuges, transitional)
4. In institutions with no housing to which to go subsequently (e.g. release from prisons, medical institutions)
5. Forced to live in temporary structures (including mobile homes/trailers), due to lack of housing and/or appropriate provision of accommodation
6. Forced to live with family or friends due to lack of housing, not own residence (e.g. 'couch-surfing')

The ETHOS system has been accepted as the standard tool of definition and measurement across almost all European countries (and outside the EU¹⁴), including by the Irish government and was the instrument endorsed in the government homeless policy *The Way Home*¹⁵. Pavee Point has consistently used the ETHOS definition of homelessness to demonstrate that Travellers constitute a large number of the 'hidden homeless' population in Ireland due to severe overcrowding.¹⁶ However, the fact many Travellers wishing to maintain their cultural traditions and access extended family support system¹⁷ is often conflated with their choosing to live in unacceptable conditions. This is not a choice.

12 Pleace, N. (2016) Exclusion by definition: The under-representation of women in European homelessness statistics. In: P. Mayock & J. Bretherton (Eds) *Women's Homelessness in Europe*. London: Palgrave Macmillan. 105-126.

13 Baptista, I. and Marlier (2019) *Fighting homelessness and housing exclusion in Europe: A study of national policies*. Brussels: European Commission.

14 For example, in 2009 adopted ETHOS in its official definition of Homelessness.

15 Department of Environment, Heritage and Local Government (2008) [The way home - strategy to address adult homelessness in Ireland, 2008-2013](#). Dublin: Department of Environment, Heritage and Local Government.

16 Pavee Point Traveller Roma Centre (2018) Civil society monitoring report on implementation of the national Roma integration strategies in Ireland. Brussels: European Commission

17 *All Ireland Traveller Health Study Team (2010) All Ireland Traveller Health Study*. Dublin: University College Dublin and Department of Health and Children.

2

Section 2: Context



2.A IRELAND'S HOUSING AND HOMELESS CRISIS

The housing sector in Ireland was severely impacted by the global financial crisis in 2008, and since then the country has struggled with a housing and homelessness crisis.

The direction of government policy has played a major role in failing to address this accommodation crisis. There has been a massive shift in Irish housing policy from the provision of public housing to an over reliance on the private rented market. 85% of social housing supports are now provided through the private rental sector with schemes such as the Housing Assistance Payment (HAP). This still leaves tenants in insecure accommodation options at the will of private landlords¹⁸.

These accommodation issues have led to a dramatic rise in homelessness and the emergence of a considerable number of families experiencing homelessness. The latest official homeless figures¹⁹ show 6,023 individual adults, 953 families, including 2,189 children are currently homeless in Ireland.

¹⁸ Hearne, R. (2019) [Opinion: the strongest indication that the government's policy has failed is how the housing emergency has extended across Irish society](#)

¹⁹ Department of Housing, Local Government and Heritage (2021) [Homeless Report - August 2021](#). Dublin: Department of Housing, Local Government and Heritage

Homeless charities such as Simon Communities²⁰ predict that homeless figures are set to rise due to a dramatic fall in the amount of affordable accommodation options available. This is, despite, a number of government policy documents and initiatives aimed at tackling the crisis.

A recent report from IHREC and the ESRI²¹ found that lone parents and their children account for 53% of all homeless families, and are much more likely to experience poor housing than other household types. The report also highlights the disadvantages experienced by young people, migrants, people with disabilities, and Travellers in the Irish housing system.

2.B TRAVELLER ACCOMMODATION IN IRELAND

Traveller accommodation is one of the most contentious and controversial areas of public policy in Ireland. The inaction of the State has attracted criticism from a number of UN treaty-monitoring bodies, European institutions and equality and human rights bodies within Ireland.²² The principal legislation for the provision of Traveller accommodation is the Housing (Traveller accommodation) Act, 1998, which places legal responsibility for the provision of Traveller accommodation on Local Authorities. The legislation requires each Local Authority to prepare, adopt and implement a five-year rolling Traveller Accommodation Programme (TAP) to meet the existing and projected accommodation needs of Travellers in their areas. While there have been some shifts in policy and legislation in relation to Traveller accommodation in recent years, the main outstanding issue in Traveller accommodation is the gap between agreed policy at national level and the implementation of this policy by the Local Authorities. Of equal concern is the use of the Housing (Miscellaneous Provisions) Act 2002 to evict Travellers living on unauthorized sites or on the roadside while they are waiting to be accommodated by a Local Authority. Other key issues in relation to Traveller accommodation include:

- **Underspend of Traveller Accommodation Budget:** Despite a slow increase in the Traveller accommodation budget, a significant portion of Traveller accommodation budgets remain unspent by Local Authorities every year. A recent Equality Review by the Irish Human Rights and Equality Commission²³ shows that in a ten-year period, between 2008 and 2018, of €168.8 million allocated to Local Authorities for Traveller specific accommodation, just two thirds (€110.6 million) were drawn down.
- For the first time since 2014, the full available budget was drawn down by Local Authorities in 2020, however, it was spent on upgrades/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 estimated to be homeless. Equally concerning is the decommissioning of Traveller accommodation in some areas to make way for commercial and general housing development. This further reduces the availability Traveller specific accommodation and creates issues for many Travellers seeking to live near family supports, including young Traveller couples with children, etc.
- **Gaps in Equality Data Due to absence of Ethnic Equality Monitoring:** Since 1993, Pavee Point has advocated for the implementation of ethnic equality monitoring, inclusive of a standardised ethnic identifier in line with the census, across all government and statutory data collection systems and state surveys, including those related to accommodation²⁴. We believe that accurate data and ethnic and gender equality monitoring is required in the struggle to protect the human rights of potentially discriminated minorities and to promote equality and address discrimination. Without data disaggregated on the basis of ethnicity, gender and other equality/identity grounds, we are unable to inform good policy and practice or highlight the existence of systemic, indirect or intersectional discrimination.

20 See statement from [Simon Communities](#), 14th September, 2021

21 Russell, H., Privalko, I., McGinnity, F. and Enright, S. (2021) [Monitoring Adequate Housing in Ireland](#). Dublin: Economic and Social Research Institute and the Irish Human Rights and Equality Commission.

22 See Concluding Observations on Ireland by the UN Committee on Economic, Social and Cultural Rights (CESCR), 2015; UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), 2017; UN Committee on the Rights of the Child (CRC), 2016; and UN Committee on the Elimination of Racial Discrimination (CERD), 2019

23 Irish Human Rights and Equality Commission (IHREC) (2021) [Equality Review on Traveller Accommodation](#). Dublin: IHREC.

24 Pavee Point Traveller and Roma Centre (2016) [Policy and Practice in Ethnic Data Collection and Monitoring](#). Dublin: Pavee Point Traveller and Roma Centre Publications

Although ethnic equality monitoring is official government policy²⁵, only a small number of public bodies routinely collect, monitor and use disaggregated ethnic data to inform policy and service provision.²⁶

A number of international, European and national human rights monitoring bodies²⁷ have endorsed Pavee Point's call for disaggregated data, consistently urging the State to prioritise implementation of longstanding government policy of ethnic equality monitoring across all government bodies and statutory agencies under their remit. The lack of implementation of ethnic equality monitoring has been notably observed in official homelessness datasets, such as the Pathway Accommodation and Support System (PASS) which is the national homelessness database used by every homeless service provider and all Local Authorities in Ireland.

The official definition of the homeless in Ireland for the purposes of gathering statistics is extremely narrow: defined as those individuals accessing state-funded emergency accommodation arrangements that are overseen by housing authorities²⁸. The PASS system captures details of individuals in emergency accommodation only and does not include information from domestic violence accommodation services or those in direct provision. PASS has an ethnic equality question (or 'ethnic identifier') in the system which is optional. The commissioned research²⁹ suggests that the question is not always asked by service providers. This means that Travellers (alongside other minority ethnic groups, including Roma) are not officially counted and remain invisible in our official homelessness statistics.

Equally, another major data gap is evident in the official Traveller accommodation data published by the Department of Housing, Local Government and Heritage, which obscures the reality of Traveller homelessness. To date, homelessness has not been included in the Department of Housing's Annual Counts of Traveller Families³⁰, something that Pavee Point believes is a major omission. Instead, the Department reports on the number of Traveller families living on 'unauthorised sites' and 'sharing houses,' which, by the ETHOS definition are homeless Traveller families. Reviewing the most recent figures published by the Department, 1,462 Traveller families, or approximately 7,749 Travellers are living on the side of the road or doubling up in houses. It is important to note that Traveller families doubling/trebling up in bays, yards and facilities are not included in this dataset and therefore these figures underestimate the extent of the crisis.

NTACC annual report categories include 'sharing' of houses and halting bay sites. This term hides the stark reality of Travellers living in conditions of chronic overcrowding. The term 'basic' service bays refers to sites that lack basic sanitation facilities, are rat infested and pose clear fire safety threats. Alternatively, Travellers are forced to live on the roadside, in carparks, or industrial spaces under constant threat of eviction. Again, as noted in our previous submission to the Joint Oireachtas Committee such circumstances contribute to and indeed exacerbate poor mental and physical health.

Pavee Point opening statement to Oireachtas Committee on Housing and Homelessness, 2016.

25 A number of government policy framework documents commit to the collection of 'equality data,' inclusive of ethnicity (e.g.) includes the [National Traveller and Roma Inclusion Strategy: 2017-2021](#); [Second National Strategy on Domestic, Sexual and Gender: 2016-2021](#); [Second National Intercultural Health Strategy 2018-2023](#); [Migrant Integration Strategy: 2017-2020](#);

26 See Concluding Observations on Ireland by the UN Committee on Economic, Social and Cultural Rights (CESCR), 2015; UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), 2017; UN Committee on the Rights of the Child (CRC), 2016; and UN Committee on the Elimination of Racial Discrimination (CERD), 2019

27 See Pavee Point Traveller and Roma Centre (2016) [Policy and Practice in Ethnic Data Collection and Monitoring](#). Dublin: Pavee Point Traveller and Roma Centre Publications. Also see the [Traveller Accommodation Expert Review](#) and the Irish Human Rights and Equality Commission (IHREC) (2021) [Equality Review on Traveller Accommodation](#). Dublin: IHREC.

28 Daly, M. (2019) ESPN Thematic Report on National strategies to fight homelessness and housing exclusion – Ireland, European Social Policy Network (ESPN). Brussels: European Commission. The statistics are reported to and published monthly by the [Department of Housing, Local Government and Heritage](#).

29 Harvey, B. (2021) *The Traveller Community and Homelessness*. Dublin: Pavee Point Traveller and Roma Centre Publications.

30 Annual Counts compiled by Local Authorities for the [Department of Housing, Local Government and Heritage](#)

The 2019 European Commission synthesis report on national strategies to tackle homelessness and housing exclusion³¹ observed these major flaws within Ireland's homeless data. These weaknesses can also be seen in the available Traveller specific accommodation data, with different datasets capturing different metrics (families, households, individuals); employing varying definitions (unauthorised sites, sharing, overcrowding); and methods (Local Authority assessments, census, survey samples) to capture Traveller homelessness. The commissioned research highlights that while there will always be the possibility of double counting in these systems, there will also be under-estimations in relation to specific cohorts of Travellers, including those:

- who do not voluntarily self-identify ethnicity (where an ethnic identifier is in place);
- who have been released from prison with no place to go to on discharge;
- accessing domestic violence accommodation services; and/ or
- accessing private rented accommodation involuntarily

The lack of ethnic equality monitoring, coupled with lack of coherence between the systems for 'Traveller accommodation statistics' and mainstream 'homeless statistics' reflects the lack of priority given to evidence-based policy making. The European Commission report referred to the current state of Ireland's data collection on homelessness as "statistical obfuscation if not 'corruption'", urging the State to "adopt the ETHOS (Light) classification³² and use it to create the foundation for a bespoke data system."

31. Report prepared by Mary Daly on behalf of the Commission. See Daly, M. (2019) [National Strategies to Fight Homelessness and Housing Exclusion: Ireland](#). Brussels: European Commission.

32. FEANTSA, the European Federation of National Organisations working with the Homeless, refers to [ETHOS light](#) refers as a version of the ETHOS typology. It is a harmonised definition of homelessness for statistical purposes. It is a pragmatic tool for the development of homelessness data collection, rather than a conceptual and operational definition to be used for a range of policy and practice purposes.

Section 3: Policy Context



3A. HOUSING AND HOMELESS POLICY

At the sharpest edges of the crisis are people experiencing homelessness moving from one emergency accommodation to another or at worst rough sleeping on our city streets. Their plight is a scar on our national conscience.

Housing for All - a New Housing Plan for Ireland, Department of Housing, Local Government and Heritage, 2021

The right to housing is set out in EU law and aspects of the right to housing are included in a range of international treaties that Ireland has either ratified, including the International Covenant on Economic, Social and Cultural Rights (ICESCR).³³ While people in Ireland do not currently have an explicit right to housing under the Irish Constitution or in Irish law, specific entitlements to social housing and housing supports are set out in our legislation and Local Authorities have responsibility under the Housing Act 1988 for the provision of housing for those who cannot afford to provide it for themselves, including people who are homeless.

³³ For comprehensive discussion see the Irish Human Rights and Equality Commission (IHREC) (2017) [The provision of emergency accommodation to families experiencing homelessness](#). Dublin: IHREC.

Over the past 15 years the State has developed a number of strategies aimed at addressing homelessness, particularly in the 2010's when the homeless crisis began to accelerate during the peak of the global financial crisis. The most recent strategy, *Housing for All³⁴ - a New Housing Plan for Ireland*, was released in September 2021 and has an overall ambitious goal of ending homelessness in Ireland by 2030. The government plans to achieve this by increasing social housing delivery and supporting social inclusion. The strategy contains a number of actions across government departments and agencies, including the establishment of a National Homeless Action Committee to examine the complex individual health and family circumstances that contribute to homelessness. While the Strategy explicitly recognises that Travellers (and Roma) are overrepresented amongst the homeless population in Ireland, it does not include any specific actions or measures to address homelessness. Instead, it refers to supporting implementation of the National Traveller and Roma Inclusion Strategy (NTRIS) 2017-2021, and any actions identified in the successor to that strategy. It also commits to the following key actions:

1. Prioritise the implementation of recommendations contained within the Traveller Accommodation Expert Group Report
2. Work with Local Authorities and AHBs to improve the quality and quantity of delivery of Traveller-specific accommodation
3. Introduce a new preferential Caravan Loan Scheme on a pilot basis in four Local Authorities in 2021 with a view to a full national rollout in 2022
4. Prioritise implementation of the recommendations of the 'Independent Review of the Role of Social Workers and Personnel Employed by Local Authorities Specifically to Assist Travellers with their Accommodation Needs'
5. Explore with the Northern Ireland Housing Executive (NIHE) the feasibility of an all island approach to the provision of a network of Transient Sites across the island of Ireland

If implemented, these actions could potentially address some of the issues identified in this paper (e.g.) overcrowding, poorly serviced sites, etc.. However, key outstanding issues remain, with Traveller families significantly overrepresented in emergency accommodation as reported by the Department of Housing,³⁵ in their monthly homelessness figures published in November 2016 and May 2017.³⁶ According to this data, approximately 10-11% of all families accessing emergency accommodation were Travellers. This requires urgent action.

The *National Traveller and Roma Inclusion Strategy (NTRIS) 2017-2021* is the key policy framework for Travellers and Roma in Ireland.³⁷ Ireland developed this cross-departmental Strategy in accordance with the EU Framework for National Roma Integration Strategies (NRIS) up to 2020. The Irish Strategy encompasses ten themes,³⁸ and contains 149 actions, six of which are under the theme of accommodation. Similar to *Housing for All*, the NTRIS acknowledges Traveller homelessness, yet does not provide any targeted actions or measures to address this. In October 2020, the European Commission issued a communication to all Member States including Ireland to further develop an updated NTRIS2 for submission to the Commission by September 2021.

Pavee Point welcomes commitments to addressing major deficits in relation to Traveller accommodation and homelessness, it is extremely disappointing that specific measures are not in place to address the issue. While the current NTRIS has kept a focus on Traveller and Roma issues, in the absence of a clear implementation plan, monitoring framework, or robust resourcing, it has had difficulty in delivering many of its actions, including accommodation. If Traveller accommodation inequalities and homelessness are to be addressed through the next iteration of NTRIS, there would have to be clear targets, timelines, and accountability from the relevant State Departments. These actions would also have to be reflected within mainstream housing and homelessness policy to ensure both a mainstreamed and targeted approach.

34 Department of Housing, Local Government and Heritage (2021) [Housing for All - a New Housing Plan for Ireland](#). Dublin: Department of Housing, Local Government and Heritage.

35 Data sourced from - Department of Children, Equality, Disability, Integration and Youth (DCEDIY) (2020) [Young Travellers in Ireland](#). Dublin: Department of Children, Equality, Disability, Integration and Youth. See Table 20.

36 Data sourced from Department of Housing's total monthly figures on homelessness. Although disaggregated data on the basis of ethnicity is not usually available, the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) requested this data as part of their 2020 report, [Young Travellers in Ireland](#).

37 Department of Justice and Equality (2017) [National Traveller and Roma Inclusion Strategy: 2017-2021](#). Dublin: Department of Justice and Equality.

38 Covering the domains of: cultural identity; education; employment and the Traveller economy; children and youth; health; gender equality; anti-discrimination and equality; accommodation; Traveller and Roma communities; and public services.

A mainstreamed approach is sufficient when outcomes are identical for target groups, but when evidence shows a clear gap between the situation of Roma and Travellers and the rest of society, policies should be adjusted and specific measures should be developed.

(European Commission Assessment of Ireland's National Traveller and Roma Inclusion Strategy, June 2016)

3.B REVIEWS OF TRAVELLER ACCOMMODATION:

There have been a number of reviews and investigations into the state of Traveller accommodation over the past 30 years. Each highlighting the lack of delivery of Traveller accommodation, failure of Local Authorities to draw down Traveller accommodation budgets and lack of ethnic equality monitoring to inform policy and service provision. The most recent reports include:

1. The Independent Expert Review on Traveller Accommodation:

In 2019, an independent Expert Group on Traveller Accommodation made 32 recommendations for the Government, including a recommendation to overhaul all relevant legislation and policies which impact on accommodation provision for Travellers. A key policy implementation mechanism was established to progress the recommendations in the form of an Expert Committee.

2. IHREC's Equality Review of Traveller Accommodation Provision by Local Authorities³⁹:

This review, published in 2021, again, reconfirmed the issues already known, including, underspend of Traveller accommodation budgets; poor information gathering to inform decision making; spending on refurbishment and renovation instead of new accommodation; lack of forward planning for actual and future Traveller accommodation needs; and Travellers being forced into culturally inappropriate housing.

The review also highlights the issue of Traveller homelessness, with most Local Authorities reporting substantial, and in some instances, disproportionate numbers of Traveller families presenting as homeless. For example, Galway City and Council reported that Travellers accounted for a disproportionate 50% of the families presenting as homeless in September 2019. Similarly, Dublin City Council reported 293 Traveller families, or over one third (32%) of the entire Traveller population in the Council area were in need of proper accommodation in 2018. This includes 104 Traveller homeless families who were accessing emergency accommodation.

According to Dublin City Council these families,

“ represent approximately 9% of the total in Emergency Accommodation while the number of Traveller children in Emergency Accommodation represents approximately 11% of the total. This shows a distinct disproportionality given that Travellers make up approximately 1% of the population nationally.⁴⁰ ”

Yet, despite this declaration, the Council had not applied for funding for new halting site accommodation since 2013.

Many Local Authorities reference numbers of Travellers living on roadside sites, in overcrowded settings, or availing of emergency accommodation. There is little analysis of the reasons for this growth, the particular experience of homelessness of Travellers, or the implications of Traveller culture and identity for an effective response

Irish Human Rights and Equality Commission Equality Review on Traveller Accommodation (IHREC, 2021)

³⁹ Section 32 of the Irish Human Rights and Equality 2014 Act gives the Commission statutory powers in relation to the carrying out of Equality Reviews and the preparation of Equality Action Plans.

⁴⁰ Dublin City Council (2018) [Traveller Accommodation Programme: 2019 – 2024](#). Dublin: Dublin City Council.

As part of the review, IHREC has made recommendations, specific to each Local Authority's individual equality review. Each Local Authority was required to report to IHREC by end of August 2021 and specify the actions already taken or intended actions within a specific timeframe in their efforts to provide Traveller accommodation. Pavee Point looks forward to seeing the specific action plans of each Local Authority, and it is vital that they are held accountable for delivering on their statutory responsibilities.

3. The Ombudsman for Children's Office 'No End in Site' Report:

The disregard for implementing human rights and legal obligations to provide Travellers accommodation was further highlighted in 2021 when the Ombudsman for Children's Office (OCO) report. Their investigation highlighted the poor living conditions in a Local Authority run halting site where 66 Traveller children and their families are living. ⁴¹The investigation 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 provision. The OCO issued a number of recommendations, including that the commitments made by the Local Authority are overseen at CEO level.

4. Traveller Accommodation Recommendations in International Treaty Body and Regional Instrument Reports:

A number of international treaty bodies⁴² have made recommendations in their country reports, urging the Irish State to address Traveller accommodation inequalities. In 2019, the European Commission against Racism and Intolerance (ECRI) strongly recommended that Ireland, "step up efforts to meet the accommodation needs of Travellers, including by improving existing halting sites to meet decent and safe living standards, and by providing adequate accessible, suitable and culturally-appropriate accommodation."

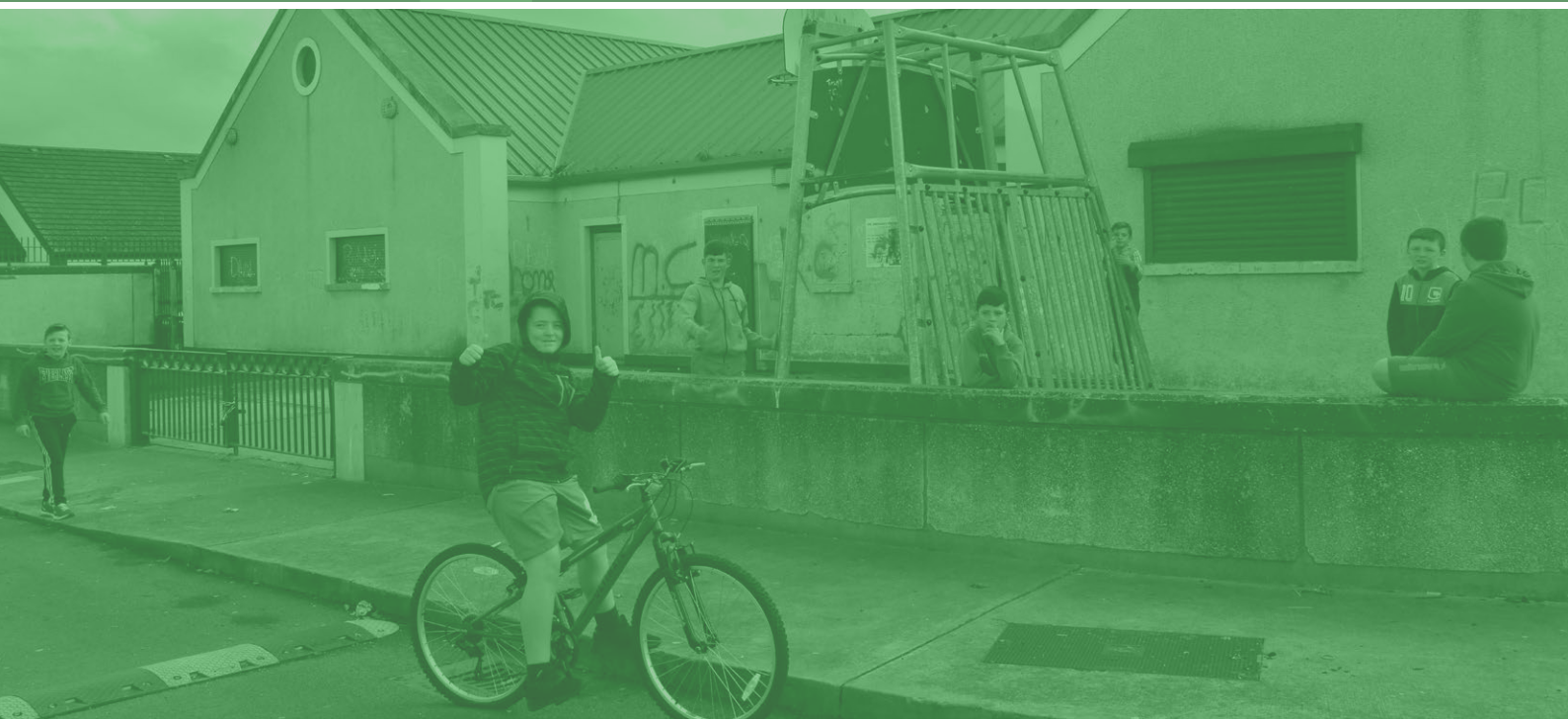
The report also recommended imposing sanctions on Local Authorities for failure to spend allocated funding, or removing the responsibility for Traveller accommodation from Local Authorities and placing it under the authority of a central housing commission. In the same year, the United Nation's Committee on the Elimination of Racial Discrimination (CERD) also made strong recommendations to the Government in terms of Traveller accommodation, urging the State to "analyse the impact of the current housing crisis on Travellers and Roma and other ethnic minority groups and take effective measures to address it."

They also recommended an increase in the budget earmarked for Traveller accommodation to the levels before the financial crisis and ensure that all of the allocated budget is fully and effectively spent.

⁴¹ The Ombudsman for Children's Office (OCO) (2021) [No End in Site: An investigation into the living conditions of children living on a Local Authority site](#). Dublin: OCO.

⁴² See Concluding Observations on Ireland by the UN Committee on Economic, Social and Cultural Rights (CESCR), 2015; UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), 2017; UN Committee on the Rights of the Child (CRC), 2016; and UN Committee on the Elimination of Racial Discrimination (CERD), 2019

Section 4: Data and statistics on Traveller Homelessness in Ireland



4A. HOW MANY TRAVELLERS ARE HOMELESS IN IRELAND?

STATISTICS FROM OFFICIAL HOUSING AND HOMELESS DATA

According to the 2019 Annual Count of Traveller Families published by the Department of Housing, Local Government and Heritage⁴³, there are approximately 10,809 Traveller families in Ireland. Traveller families are dispersed throughout the country and in terms of accommodation, the vast majority of Travellers (71%) rely on Local Authorities for some form of accommodation assistance, including in Traveller-specific accommodation and social housing supports. In terms of breakdown:

- 53% of Traveller households live in Local Authorities or approved housing bodies;
- 18% in supported tenancies in private rented;
- 7% own their accommodation;
- 8% living in Traveller group housing schemes;
- 9% doubling/trebling up with other families; and
- 5% are living on the side of the road.

⁴³ Department of Housing, Local Government and Heritage (2021) 2019 Estimate – All Categories of Traveller Accommodation. Dublin: Department of Housing, Local Government and Heritage.

Based on Census data,⁴⁴ it is clear that Travellers have been disproportionately impacted by the homeless crisis in Ireland and are over-represented in the homeless figures. According to Census 2016⁴⁵:

- Travellers comprised 9% of those who were homeless on census night, with an overall 7.5% of all Travellers being counted as homeless.
- In a 5-year period, there was a 12% increase in the numbers of Travellers living in temporary accommodation.
- Travellers are seven times more likely than the general population, to be living in over-crowded dwellings.

Although there are major deficits in the availability of robust disaggregated data on the basis of ethnicity as it relates to housing and homelessness, a number of data points can be used alongside the census data to develop a broad picture of Traveller homelessness (see Table 1)⁴⁶.

Table 1: Consolidated baseline estimate of Traveller homelessness from the Pavee Point commissioned research				
Measurement system	% homeless	Number	Date	Notes
Local Authority counts	13.5%	1,462 (families)	2019	a
Analysis of TAPs	16.4%	1,332 (families)	2019	b
Housing needs	1.7%	1,173 (households)	2018	c
Census as homeless	7.5%	517 (individuals)	2016	d
Census as overcrowded	39.1%	2,191 (households)	2016	e
Notes <ul style="list-style-type: none"> a Definition of 'unauthorized sites' and 'sharing' b Similar, based on 24 of 31 Local Authorities c Basis for identification as Traveller for this list not clear. d Those in emergency accommodation self-identifying as Traveller e More than one person per room, based on 30,987 national figure 				

Triangulating data from these multiple sources, the commissioned research⁴⁷ suggests that approximately 39% of Travellers meet the threshold of being homeless using the standard European definition of homelessness. This includes Travellers living on the side of the road, doubling up on sites, sleeping rough or in cars, in emergency accommodation (including domestic violence refuge), as well as living on unsafe and overcrowded sites. This would be the equivalent of approximately 1.9 million people in the general Irish population living in 'hidden homelessness,' that is, in unsafe, insecure and inadequate accommodation. Pavee Point strongly believes that 'hidden' forms of homelessness are not truly hidden or invisible in society, as these harsh realities are evident for many Travellers. This issue is being ignored and is not being prioritised by the State within the wider discussion on housing and homelessness.

⁴⁴ See [Census 2011](#) and Census 2016

⁴⁵ [Census 2016](#)

⁴⁶ Data derived from multiple sources and triangulated as per Harvey, B. (2021) *The Traveller Community and Homelessness*. Dublin: Pavee Point Traveller and Roma Centre Publications.

⁴⁷ Harvey, B. (2021) Pavee Point Commissioned Research: The Traveller Community and Homelessness. Dublin: Pavee Point Traveller and Roma Centre.

DATA ON TRAVELLER WOMEN'S HOMELESSNESS

During the housing crisis in Ireland, academics have referred to the 'feminisation of homelessness'⁴⁸, with women now accounting for a sizeable proportion of adult homeless. In Ireland, women account for approximately 42% of the adult homeless population, with this number rising to approximately 44% in the Dublin region, in comparison to an average of 20-33% across Europe⁴⁹. However, when an intersectional lens is applied to the homelessness crisis, the commissioned research⁵⁰ suggests that Traveller women account for approximately 50% of the overall Traveller adult homeless population. This includes Traveller women who have experienced or are experiencing domestic violence.⁵¹

OVER-REPRESENTATION OF TRAVELLER WOMEN IN REFUGES

While there is a lack of comprehensive and reliable data and research on the impacts of domestic violence on Traveller women, available data shows that Traveller women account for the largest group in admissions to refuges, with 49% of refuge admissions being Travellers and 57% of Traveller women recorded as repeat admissions.⁵² Tusla figures from 2015 also show that Traveller women use refuge services more frequently than other members of the Irish population.⁵³

This data is often conflated with prevalence resulting in an assumption that domestic violence is more prevalent in the community and part of Traveller culture even amongst service providers and policy makers. Such assumptions risk leading to inappropriate responses towards Traveller women and leaving women outside of safety and protection. This analysis also fails to take into consideration the reasons why Traveller women use refuges which is most likely due to a lack of alternative places to go to due to severe overcrowding, etc.

IMPACTS OF HOMELESSNESS ON TRAVELLER WOMEN AND GIRLS

NGOs and feminist scholars have highlighted the lack of attention to gender in relation to the housing/homelessness crises across Europe, including policy measures to address the issue. In Ireland for instance, Housing for All, completely ignores the gendered dimensions of homelessness. This, despite women accounting for just under half (42%) of the total homeless population in the State. Similarly, there is a glaring absence of an intersectional analysis applied within research and mainstream housing/homelessness policies.

Homelessness has a particular effect on Traveller women and girls, including an impact on overall health and well-being. Traveller women and girls are one of the most marginalised groups in Irish society and their experiences of homelessness differs to that of the majority population or other minority groups. Many Traveller women and girls may not come in contact with mainstream homeless services due to a variety of reasons. These can include fear and mistrust in mainstream services due to past experiences of negative and/or discriminatory treatment, lack of information and awareness about services, literacy barriers, child protection fears that their children will be taken away following presentation to services and so forth. This often results in Traveller women living in hidden homelessness or only coming into contact with services when they are already experiencing multiple and complex needs.



48 National Women's Council of Ireland (NWCi) (2018) [Impacts of homelessness on women's health](#). Dublin: NWCi.

49 Pleace, N. (2016) Exclusion by definition: The under-representation of women in European homelessness statistics. In: P. Mayock & J. Bretherton (Eds) *Women's Homelessness in Europe*. London: Palgrave Macmillan. 105-126

50 Harvey, B. (2021) Pavee Point Commissioned Research: The Traveller Community and Homelessness. Dublin: Pavee Point Traveller and Roma Centre.

51 Tusla's draft literature review cites the interconnection between domestic violence and homelessness and sources for such evidence domestically and internationally, in Flynn, A., and C. Crowley, *Somewhere Safe, Informing Ireland's Provision of Domestic Violence Emergency Accommodation through an International Lens*, Final Draft Number 3, January 2020.

52 Watson, D., and S. Parsons (2005) [Domestic Abuse of Women and Men in Ireland](#). Dublin: National Crime Council and The Economic and Social Research Institute. In 2009 37% of women accessing refuge identified themselves as Travellers, The Women's Health Council (2009). [Translating Pain Into Action: A study of Gender-based Violence and Minority Ethnic Women in Ireland](#). Dublin: The Women's Health Council.

53 It has been found that although Traveller women account for less than 1% of the Irish female population, they may account for "one third to a half of admissions to refuges" See Tusla report, [Towards Evidence Based Services](#), for contributing factors for over-representation in refuges.

Additionally, similar to the general population, Traveller women are the primary caregivers for their families and often have multi-generational caring responsibilities for other family members. As a result, Traveller women who are homeless have to bear the brunt of having to cope with either living in emergency accommodation or in situations of severe overcrowding, often on unsafe sites with lack of access to toilets, clean running water and refuse collection. This is particularly difficult for Traveller women who are pregnant or have recently given birth and younger Traveller girls going through puberty.

It also has an overall impact on the health status and overall well-being of Traveller women and girls, specifically mental health, which is already at crisis point. For instance, Traveller women's suicide is 5 times higher than women in the general population, and recent data from the National Suicide Research Foundation and the HSE⁵⁴ found that Traveller women had 3 times higher rates of suicide-related ideation and 4 times higher rates of self-harm than women in the general population.

While Pavee Point and other Traveller organisations have consistently raised our concerns in relation to the impact of homelessness on Traveller women and girls, policy and research to date has wholly ignored the gendered and intersectional impacts of homelessness. It is clear that the needs of Traveller women and girls are not being adequately addressed in current housing/homeless policy and service provision and further measures are required.

4.B TRAVELLER FAMILY HOMELESSNESS

Census 2016⁵⁵ figures show that 32% of Travellers aged 15–29 are married, and 40% of Travellers are under the age of 15. This shows that the Traveller population is young and comprised of young families. Traveller families also tend to be larger than the general population, with the average Traveller family size 5.3 compared to 4.1 in the general population. Additionally, 1 in 2 Traveller women aged 40–49 having given birth to 5 or more children. This has an impact on Traveller families' accommodation needs, and must be considered when providing housing and homeless supports.

As homeless demographics changed nationally, with a dramatic rise in child and family homelessness (child homelessness increased by almost 200% from 2014-present)⁵⁶, so too did Traveller family homelessness. Homeless Traveller families are living in every county in Ireland, the largest concentration evident in Dublin which is consistent with the national homeless profile picture⁵⁷. Traveller families are also significantly overrepresented in emergency accommodation. According to monthly homeless figures published by the Department of Housing,⁵⁸ in November 2016 and May 2017,⁵⁹ approximately 10–11% of all families accessing emergency accommodation were Travellers. Such disaggregated data on the basis of ethnicity is not usually made available but it was published at the request of the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) as part of their 2020 statistical spotlight report, *Young Travellers in Ireland*⁶⁰. Additionally, Dublin City and County Council reported that on October 31st 2018, there were a total of 504 homeless Travellers in emergency accommodation⁶¹.

54 Data sourced from: Kavalidou, K., Daly, C., McTiernan, N. and Corcoran, P. (2021) 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 Collaborating Centre on Surveillance and Research in Suicide Prevention University College Cork, Ireland &

55 [Census 2016](#).

56 See [Focus Ireland Latest Figures](#)

57 See [Focus Ireland Latest Figures](#)

58 Department of Children, Equality, Disability, Integration and Youth (DCEDIY) (2020) [Young Travellers in Ireland](#). Dublin: Department of Children, Equality, Disability, Integration and Youth.

59 Data sourced from Department of Housing's total monthly figures on homelessness. Although disaggregated data on the basis of ethnicity is not usually available, the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) requested this data as part of their 2020 report, [Young Travellers in Ireland](#)

60 Department of Children, Equality, Disability, Integration and Youth (DCEDIY) (2020) [Young Travellers in Ireland](#). Dublin: Department of Children, Equality, Disability, Integration and Youth

61 Data derived from Traveller Accommodation Expert Review. Analysis based on figures from the Department of Housing, Local Government and Heritage (2021) 2019 Estimate – All Categories of Traveller Accommodation. Dublin: Department of Housing, Local Government and Heritage.

4.C FACTORS LEADING TO TRAVELLER HOMELESSNESS

There are a number of pathways, factors and reasons for the disproportionate number of Travellers experiencing homelessness. Research to date and the work of Pavee Point has highlighted and indicated the impacts of racism and discrimination, site evictions, lack of culturally appropriate accommodation and lack of accommodation for larger family sizes as some of the reasons as to the disproportionate numbers of Travellers experiencing homelessness. Furthermore, similar to the general population, Travellers have been subject to eviction from private rented accommodation which is often due to the lack of security of tenure for many renters in Ireland.



This commissioned research⁶² reflects a concerning picture, of an unending cycle, of homelessness, with Travellers moving from insecure private rented accommodation, back to crowded sites, and then back into homelessness. This has resulted in Travellers seeking homeless services, including young Travellers couples with or without children.

We also note additional difficulties for some Travellers, including Travellers who have lived in foster care and young Travellers leaving foster care are at a high risk of becoming homeless. Similarly, Travellers who have mental health and addiction issues (or have a dual diagnosis) which can lead to familial breakdown. In both instances, Travellers are having to navigate a complex system without meaningful support from either family members or State services, while at the same encountering a number of barriers that have been outlined in this report, including racism and discrimination. This is further compounded by extremely high rents in the private rental market and a lack of available social housing which means that accessing accommodation is almost impossible for many Travellers.

4.D IMPACTS OF RACISM AND DISCRIMINATION ON TRAVELLER HOMELESSNESS

The 2018 Irish Human Rights and Equality Commission report, *Discrimination and Inequality in Housing in Ireland*⁶³, supports Pavee Point's analysis and states that "members of the Traveller Community are the most at risk of being homeless. It also found that Travellers experienced the highest levels of racism and discrimination in relation to accommodation, with Travellers almost ten times as likely to report discrimination in access to housing as the general population, even after education and employment status are held constant. Further, according to the Housing Agency report⁶⁴, *Travellers in the Private Rented Sector*, even where private rented accommodation exists, the overwhelming majority of landlords (82%), would not rent to Travellers, despite the Equal Status Act, under which it is illegal to discriminate against Travellers in accommodation.

62 Harvey, B. (2021) Pavee Point Commissioned Research: The Traveller Community and Homelessness. Dublin: Pavee Point Traveller and Roma Centre.

63 Grotti, R., Russell, H., Fahey, É. and Maître, B. (2018) *Discrimination and Inequality in Housing in Ireland*. Dublin: Irish Human Rights and Equality Commission by the Economic and Social Research Institute.

64 Housing Agency (2017) *Research Report Experiences of Travellers in the Private Rented Sector*. Dublin: Housing Agency.

More recently in 2020, research from the European Union Agency for Fundamental Rights (FRA)⁶⁵ on Travellers and Roma in 6 European countries, found that Irish Travellers had one of the highest rates of reported discrimination when accessing accommodation, with 73% reporting discrimination when trying to rent or buy houses in the last five years. This is compared to half of the respondents in Sweden and one third of the respondents in Belgium and France. The lowest rate of discrimination in accessing accommodation was reported in the UK at 21%.

4.E WHAT ARE THE EXPERIENCES OF TRAVELLERS IN HOMELESS SERVICES?

Travellers are not homogenous, and experiences of homelessness are contingent on a number of factors, including geographical location, access to services, and familial support. However, data from the Pavee Point commissioned research suggests there is similarity in the reported experiences of Traveller homelessness.

Like other people experiencing homelessness, when Travellers present as homeless, services can be provided with emergency homeless accommodation. This accommodation can often present many challenges to the people and families who stay there. They are often confined in very tight spaces, with no basic facilities for cooking or washing clothes. And what is intended as a short-term solution can become a family's accommodation for a year or more.

4.F EXITING HOMELESS SERVICES

According to the commissioned research⁶⁶, existing homelessness and overcrowding was slow and problematic for Travellers, with long waits on social housing lists reported. This could potentially have severe knock-on effects for the further generations.

4.G KEY CHALLENGES FOR TRAVELLERS EXITING HOMELESSNESS:

Lack of supply of affordable accommodation in public and private sectors:

Similar to the general population, there are a number of key challenges for Travellers exiting homelessness. In addition to issues related to racism and discrimination as outlined previously, Travellers must also contend with the lack of availability of social housing, difficulties accessing voluntary housing and high rent prices in the private sector. In a recent report published by FEANTSA, the European Federation of National Organisations working with the Homeless⁶⁷, in Ireland, "average rent in the second quarter of 2020 was EUR 1,256 nationally, and EUR 1,758 in Dublin, against an average income of EUR 1,176 for young people aged 15-24". Given the majority of Travellers are unemployed (80.2%⁶⁸) and are an extremely young population, many Travellers are struggling to afford accommodation in the private rental sector even with social housing supports such as Housing Assistance Payment (HAP), etc. Even where Travellers are availing of HAP, rent prices often exceed the allocated thresholds for the Local Authority area which means that Traveller families have to bridge the gap, placing families at a high-risk of poverty. Furthermore, there has not been an increase of the level of rent support for the households currently on the Housing Assistance Payment (HAP) since 2016.⁶⁹

Family Size:

Currently units for social housing tend to be two or three bed units, as far more of this unit type are available on the property market. This often excludes Traveller families from accessing suitable accommodation due to larger family sizes. Focus Ireland's submission⁷⁰ to the Joint Oireachtas Committee on Key Issues affecting the Traveller community highlighted that Traveller households can often become trapped in emergency accommodation or left with no option but to return to unserviced and uninhabitable sites or overcrowded accommodation with extended family which can create tension and conflict.

65 EU Fundamental Rights Agency (FRA) (2020) [Travellers in Ireland - Key results from the Roma and Travellers survey 2019](#). Vienna: EU

66 Pavee Point (2020) Pavee Point (2020) Commissioned Research: The Traveller Community and Homelessness. Dublin: Pavee Point Traveller and Roma Centre.

67 FEANTSA (2021) [Sixth Overview of Housing Exclusion in Europe, 2021](#). Brussels: FEANTSA.

68 [Census 2016](#)

69 Threshold (2019) [The Housing Assistance Payment \(HAP\): making the right impact?](#) Dublin: Threshold.

70 Focus Ireland (2021) [Opening Statement to Joint Committee on Key Issues affecting the Traveller Community: Access to Housing and Accommodation](#). Dublin: Focus Ireland.

Choice Based Letting (CBL):

The process of moving up the housing list had become more challenging due to the Choice Based Letting (CBL) scheme, which is an allocation system of social housing, used by some Local Authorities. Essentially, applicants bid on a house when it comes up, each prospective house being on-line for a week.

The rationale behind this system is that it offers more choice and involvement for applicants in selecting their homes, maximizing satisfaction and thereby reducing the likelihood of a refusal. Additionally, CBL seeks to optimize occupancy rates as vacant properties do not remain vacant for an extended period of time, thus decreasing costs for Local Authorities. Rebuilding Ireland⁷¹ recommended the introduction and implementation of CBL 'as early as possible across all Local Authorities a choice-based or equivalent allocation system, tailored to their specific circumstances.'

In 2016, Pavee Point raised concerns about the CBL system in our submission to the Joint Oireachtas Committee on Housing and Homelessness.⁷² In particular, we argued that there was a lack of accessibility and transparency with the system and it was of little use for individuals with little to no literacy and/or access to a computer with internet as applications must be made in writing and submitted to the online system within a short timeframe. 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. It is important to note that this figure represents Travellers living in some type of accommodation and does not represent Travellers who living on the side of the road, accessing emergency accommodation, etc. Further in terms of educational attainment, in 2010, 50% of Travellers had poor functional literacy.⁷³ According to Census 2016, 48.2% of Traveller mothers whose youngest child was under 5 years old had either no formal education or primary education only,⁷⁴ and of all Travellers aged 15 and over⁷⁵:

- 55% had completed their formal education by the age of 15⁷⁶; and
 - 11.5% had no formal education and 28.3% had completed primary education only⁷⁷.
- By comparison 1% of the general population had either no formal education or primary level only.

Reflecting on this data, it is clear that the current CBL system is completely inappropriate and inaccessible for the majority of Travellers, greatly reducing their chances of securing Local Authority accommodation. This is ironic, given that this system should benefit the most vulnerable as offers are based on the applicant with the highest list position for that property (longest on list, highest points and most suitable family size, etc.). While Travellers may satisfy this criteria, the inaccessibility of the allocation system means that Travellers are unable to fully participate.

Although we note that some Local Authorities have recommended that applicants use local libraries to complete their CBL applications, this is contingent on the fact that (a) there is a library in the local vicinity and open in the context of COVID-19; (b) individuals have access/membership to a library; (c) individuals can read and write; and (d) individuals have basic computer skills.

Discharge from prisons and application of criminality tests:

The risk for Travellers being imprisoned is 15 to 22 times higher than that of the general population;⁷⁸ with the risk being higher for Traveller women. In 2018, Pavee Point in partnership with the Travellers in Prison Initiative (TPI) and the Irish Prison Service (IPS) supported the implementation of ethnic equality monitoring in the Irish prison system⁷⁹.

As part of this work, IPS undertook a baseline census of all prisoners and reported that 414 Travellers in custody, or 10% of the total population, with 15% of those Traveller of women. Equally the Irish Probation Service reports that up to 10% of all referrals to the Service are Travellers.

71 As per Action 5.4 of Rebuilding Ireland. See Department of Housing, Planning, Community and Local Government (2016) *Rebuilding Ireland: Action Plan for Housing and Homelessness*. Dublin: Department of Housing, Planning, Community and Local Government.

72 Pavee Point Traveller and Roma Centre (2016) [Pavee Point opening statement to Oireachtas Committee on Housing and Homelessness](#). Dublin: Pavee Point Traveller and Roma Centre.

73 All Ireland Traveller Health Study Team (2010) *All Ireland Traveller Health Study*. Dublin: University College Dublin and Department of Health and Children.

74 See Table 12- Department of Children, Equality, Disability, Integration and Youth (DCEDIY) (2020) [Young Travellers in Ireland](#). Dublin: Department of Children, Equality, Disability, Integration and Youth

75 [Census 2016](#)

76 [Census 2016](#)

77 [Census 2016](#)

78 All Ireland Traveller Health Study Team (2010) [All Ireland Traveller Health Study](#). Dublin: University College Dublin and Department of Health and Children.

79 This includes the rollout of an ethnic equality question in the Prisoner Information Management System (PIMS). Data sourced from the Travellers in Prison Initiative (2021)

The commissioned research⁸⁰ suggests that the risk of homelessness for a Traveller on discharge from prison is significant, particularly where familial breakdown has occurred. The post-release accommodation problem is a long standing one as the prison service has argued that it is the responsibility of the Local Authority to support the accommodation needs of discharged prisoners. While some prison authorities provide bed-and-breakfast for up to two nights others do not and therefore prisoners upon release are directed to homeless services. In 2019, the Irish Prison Service reported that 363 sentenced prisoners declared a risk of homelessness in advance of their release. In May 2020, the Irish Prison Service reported that 26% prisoners pending release sought social housing support as they did not have anywhere else to go⁸¹. It is unknown how many Travellers constitute this cohort due to the lack of available disaggregated data based on ethnicity.

Further issues highlighted in the commissioned research⁸² suggest that some Local Authorities include questions on criminality in social housing application forms, which could potentially exclude Travellers from being considered. This is in line with national legislation which permits Local Authorities to exclude tenants (or any member of the household) under the Housing (miscellaneous provisions) Act, 1997 and the Traveller (accommodation) Act, 1998. The key legislation often used by some Local Authority is Section 14 of the 1997 Act, which permits the Local Authority to 'refuse or defer housing' if the authority considers that the person is or has been engaged in anti-social behaviour or that a letting to that person would not be in the interest of good estate management, or the person fails to provide information, including information relating to persons residing or to reside with that person, which is requested by the housing authority and which the authority considers necessary in connection with an application for the letting'.

The commissioned research reports that the Dublin City Council social housing application specifically identifies convictions under the Criminal justice (public order Act), 1994 and contravention of orders under the 1997 Act; the Criminal justice Act, 2006; the Children Act, 2001; and asks for information on squatting; or having been previously evicted. There is little information or transparency on how this information is used to assess applications.

80 Harvey, B. (2021) *Pavee Point Commissioned Research: The Traveller Community and Homelessness*. Dublin: Pavee Point Traveller and Roma Centre.

81 As per Parliamentary Response by the Minister for Justice, Charles Flannigan, T.D. [here](#).

82 Harvey, B. (2021) *Pavee Point Commissioned Research: The Traveller Community and Homelessness*. Dublin: Pavee Point Traveller and Roma Centre.

Section 5: The Impact of Homelessness on Travellers



5.A THE IMPACT OF HOMELESSNESS ON TRAVELLER HEALTH

Poor housing conditions are one of the mechanisms through which social and environmental inequality translates into health inequality.

Public Health Medicine Environment and Health Group Position Paper on Housing and Health (HSE, 2021)

The right to health is the enjoyment of a range of services, goods, facilities and conditions necessary to ensure that people can reach the highest attainable standard of physical and mental health, including the social determinants of health⁸³. A social determinants approach to health recognises that key determinants of health exist outside of the health sector.

This approach recognises that issues such as adequate living conditions, educational attainment, employment status, racism, discrimination and poverty all impact on health, as reflected in Sláintecare and the Healthy Ireland Strategy a Framework for Improved Health and Well-Being 2013-2025. Both Sláintecare and the Healthy Ireland are underpinned by “a whole-system philosophy involving cross-government and cross-societal responsibility⁸⁴” recognising that health is the responsibility of all sectors in society and that health outcomes are affected by much that is beyond the control of health services. It promotes partnerships and cross-sectoral working including greater collaboration between health services and Local Authorities.

⁸³ United Nations Committee on Economic, Social and Cultural Rights, ‘General Comment No. 14: The Right to the Highest Attainable Standard of Health (Art. 12 of the Covenant)’ (2012) E/C.12/2000/4

⁸⁴ Sláintecare is Ireland’s key health policy framework which seeks to transform our health and social care services and deliver universal health care. See Department of Health (2020) [Sláintecare Implementation Strategy and Action Plan 2021-2023](#). Dublin: Department of Health.

Traveller Health Statistics ⁸⁵

- **134 excess Traveller deaths per year**
- **Traveller mortality is 3.5 times higher**
- **Life expectancy for Travellers is on average 13.3 years less; 15.1 years less for Traveller men and 11.5 years less for Traveller women**
- **Infant mortality rate is 3.6 times higher**
- **Suicide rate among Traveller men is 6.6 times higher and accounts for over 1 in 10 of Traveller deaths⁸⁶**
- **Only 3% of Travellers reach 65 years**
- **63% of Travellers are under 25 years⁸⁷**
- **Travellers have a greater burden of chronic diseases; COPD four times higher and asthma two times higher than the general population.**



Access to accommodation that is affordable, habitable, accessible and culturally adequate, is a basic human right. Homelessness is severe form of poverty and social exclusion and is a violation of fundamental human rights. Lack of access to safe and secure accommodation has a significant impact on health and well-being. People without a home often experience complex and chronic health conditions including mental health and addiction issues and face barriers in accessing appropriate health care.

The *All-Ireland Traveller Health Study* concluded that the most disadvantaged Travellers are living in very poor conditions, arguing, “the better accommodated the Traveller family, the better the health status.” This was acknowledged in the National Traveller Health Strategy which notes:

There is little doubt that the living conditions of Travellers are probably the single greatest influence on health status. Stress, infectious disease including respiratory disease and accidents are all closely related to the Traveller living environment. It is clear that an immediate improvement in the living conditions of Travellers is a prerequisite to the general improvement of health status.

Traveller Health: A National Strategy 2002-2005 (Department of Health & Children, 2002)

⁸⁵ All Ireland Traveller Health Study Team (2010) [All Ireland Traveller Health Study](#). University College Dublin and Department of Health and Children

⁸⁶ All Ireland Traveller Health Study Team (2010) [All Ireland Traveller Health Study](#). University College Dublin and Department of Health and Children. These findings have been fully supported by more recent research, including the Economic and Social Research Institute, Dorothy Watson, Oona Kenny and Frances McGinnity (2017) [A Social Portrait of Travellers in Ireland](#). Dublin: ESRI; EU Fundamental Rights Agency (FRA) (2020) [Travellers in Ireland - Key results from the Roma and Travellers survey 2019](#). Vienna: EU Fundamental Rights Agency (FRA).

⁸⁷ [Census 2016](#); compared with 35% of the general population

People who are chronically homeless face substantially higher morbidity in terms of both physical and mental health and of increased mortality. Housing that is insecure sometimes due to affordability issues or weak security of tenure is stressful and also has a negative impact on physical and mental health.

Public Health Medicine Environment and Health Group Position Paper on Housing and Health
(HSE, 2021)

IMPACTS OF HOMELESSNESS ON TRAVELLER CHILDREN'S HEALTH

Poor living conditions and homelessness have severe impacts on children's health and wellbeing. Children who have experienced homelessness are more likely to have health problems, have developmental delays, and higher rates of depression, and anxiety⁸⁸.

The state of Traveller children's health is exceptionally poor, with Traveller babies three times more likely to die in their first year than infants in the general population⁸⁹. Additionally, according to the *All Ireland Traveller Health Study*⁹⁰, asthma is the most frequently reported adverse chronic health condition for Traveller children with chest infection the most commonly cited recent acute condition. Around a quarter of Traveller children were reported to have ever had an accident, with the most reported type of injury was a fall. Accidents cannot be decoupled the poor living conditions and unsafe sites as the study also reported considerable numbers of Traveller families living in Traveller specific accommodation lacking footpaths, public lighting fire hydrants and safe play areas, the latter being unavailable for the majority of Traveller families (77.5%). A quarter of families (24.4%) considered where they lived to be unhealthy or very unhealthy and appreciable numbers (26.4%) considered their place of residence unsafe. While the findings of the All Ireland Traveller Health Study were published in 2010, the veracity of its findings has been endorsed by a number of subsequent State surveys and research reports, including most recently by the EU Fundamental Rights Agency in its 2019 Travellers in Ireland Survey.⁹¹

There is a clear link between overall health status and access to adequate and safe accommodation, with strong evidence from Traveller organisations and number of reviews of Traveller accommodation discussed in the previous section highlighting the key issues, including related to lack of water toilets or refuse collection; sleeping rough or living in cars, lack of personal space; rodent infestation; and lack of recovery space for Travellers following medical procedures all impacting on the poor health status of Travellers.

Improved accommodation can save lives, prevent disease, increase quality of life and reduce poverty. Given Travellers' well-documented health inequalities, coupled with disproportionate rates of homelessness, a coordinated and integrated urgent response is required the Local Authorities with appropriate wrap around supports provided by the HSE.

88 Threshold (2019) [Impact on homelessness on children: A submission to the Joint Oireachtas on Children and Youth Affairs](#). Dublin: Threshold.

89 This is based on the overall Traveller Infant Mortality Rate (IMR) which is 3.7 times the national rate and 2.8 times the EU average. See: All Ireland Traveller Health Study Team (2010) [All Ireland Traveller Health Study](#). University College Dublin and Department of Health and Children.

90 Of all Traveller children's chronic health conditions reported by Traveller parents, [71.9% of those reported asthma](#).

91 EU Fundamental Rights Agency (FRA) (2020) Travellers in Ireland - Key results from the Roma and Travellers survey 2019. Vienna: EU Fundamental Rights Agency (FRA).

5.D THE IMPACT OF COVID-19 ON TRAVELLER HOMELESSNESS

The COVID-19 pandemic has laid bare the pre-existing and vast structural inequalities in housing systems over the world.⁹² 1.8 billion people worldwide live with homelessness and grossly inadequate housing. Overcrowding and substandard housing makes prevention self-isolation and recovery more difficult. The importance of housing as a social determinants of health has never been more visible.

Housing Shock: The Irish Housing Crisis and How to Solve It (Hearne, 2020)

The COVID-19 pandemic reached the Republic of Ireland on 29 February 2020 and from the onset, Pavee Point was concerned that it would have a potentially devastating impact on the Traveller (and Roma) community given existing health inequalities and poor living conditions. The combination of more cramped and poorer living conditions; poorer health status and health literacy; and poorer access to primary care had the potential to create a perfect storm for the rapid spread of the pandemic. Throughout the pandemic, the unacceptable living conditions of many Travellers, including those who are homeless, placed them in extremely vulnerable situations with limited capacity to comply with public health guidance, particularly in relation to the need to self-isolate. This has placed Travellers, particularly homeless Travellers, at significant increased risk of hospitalisation, ICU admission and/or death compared to the general population.

Travellers (all ages and those aged 18-64 years) were noted to be at an elevated risk of infection, and in those aged 18-64 years there was an increased risk of severe disease (in terms of hospitalisation when considered as a proportion of cases, and hospitalisation, ICU admission and death when considered as a proportion of the population). Notably, these results are considered to underestimate the true prevalence, given limitations with the use of ethnic identifiers and the hard-to-reach nature of this population.

Evidence synthesis for groups in vaccine allocation group nine - those aged 18-64 years living or working in crowded conditions (Health Information and Quality Authority [HIQA], 2021)

Members of the Traveller and Roma communities and people who are homeless are the only specific groups identified as being at significantly increased risk of hospitalisation ICU admission or death compared to the general population and should be prioritised for vaccination”

Updated Recommendations: Priority Groups for COVID-19 Vaccination (The National Immunisation Advisory Committee [NIAC], 2021)

One positive development during the pandemic was the involvement of public health doctors in addressing the poor living conditions of Travellers. The authority they brought to the concerns which have been raised by Traveller organisations over many years was vitally important. From this engagement, Local Authorities provided and approved essential services such as running water, sanitation and electricity within a matter of weeks, despite Travellers and Traveller organisations advocating for such basic services for many years. The provision of such necessities (water, toilets and electricity, etc.) was prioritised due to public health and had an important impact on the lives and health of Travellers. Moving forward, it is imperative that public health continue this positive engagement and ongoing involvement with Traveller Health Units and Traveller organisations in addressing Traveller health inequalities given the disproportionate rates of chronic health conditions and communicable diseases as evidenced in the All Ireland Traveller Health Study.⁹³

92 Farha, L. (2020) [COVID-19 Guidance Note: Protecting renters and mortgage payers](#). Geneva: United Nations High Commissioner for Refugees.

93 All Ireland Traveller Health Study Team (2010) All Ireland Traveller Health Study. University College Dublin and Department of Health and Children.

A national ban on evictions by the Government to protect renters and mortgage holders who could not make payments during the pandemic was particularly important. However, Travellers who were unauthorised to occupy Local Authority land were not initially included in these protections. Pavee Point were extremely concerned that this would exacerbate the existing Traveller homelessness crisis and that many Traveller families would be left without anywhere to go if evicted. Through the advocacy work of Pavee Point and other Traveller organisations, Travellers were included in the emergency ban on evictions which was also extended to Travellers on the side of the road. This offered some security to particularly vulnerable Traveller families living on the roadside during the pandemic. However, as national restrictions have eased, the moratorium on evictions has been lifted, there are concerns that Travellers will be more vulnerable to homelessness.

Moreover, COVID-19 also had negative implications for Traveller children and students in terms of access, participation and outcomes in education⁹⁴ due to remote education during 2020/21. Many Traveller families raised concerns on the negative impact on their children who were homeless or living in overcrowded conditions, as it was difficult to access quiet, private space at home for study. Further, lack of access to internet, and on some sites, consistent supply of electricity presented huge challenges for Travellers to continue with their education.



94 Pavee Point Traveller and Roma Centre and the National Traveller Women's Forum (2020) [The Implications of COVID-19 for Traveller and Roma transfer to and progression within Higher Education](#)

Section 6: Recommendations

It is clear from the evidence shown that homelessness in the Traveller community is a significant concern. Using the ETHOS definition, a high percentage (39%) of the entire Traveller population are experiencing homelessness in Ireland today. A number of recent international and State reports and pieces of research have highlighted this and it is now time for clear, concrete actions in both Traveller specific policies and within mainstream housing and homelessness policy.

PAVEE POINT RECOMMENDS THE FOLLOWING KEY RESPONSES TO THE TRAVELLER HOMELESS CRISIS:

Department of Housing, Local Government and Heritage, to:

- Ensure full implementation of recommendations by the Expert Group on Traveller accommodation, including overhauling legislation and policies which negatively impact on accommodation provision for Travellers.
- Apply and implement in policy, and practice, the ETHOS definition which has been accepted as the standard tool of definition and measurement across almost all European countries.
- Build on the welcome references to Travellers and Traveller homelessness in *Housing For All*⁹⁵ by naming Travellers as a priority group in mainstream housing/homeless strategies and ensuring that the needs of Travellers are met through clear targets, actions, and resources to address Traveller accommodation and homelessness issues.
- Include clear actions on addressing Traveller homelessness in Traveller specific policy, including the next iteration of the National Traveller and Roma Inclusion Strategy and the elaboration and implementation of Traveller Accommodation Plans (TAPs).
- At a minimum, include the following targets in the new National Traveller and Roma Inclusion Strategy as set out in the EU Traveller and Roma strategic framework for equality, inclusion and participation for 2020 – 2030.⁹⁶
 - Cut the number of Travellers sleeping rough and using emergency accommodation in half by 2030
 - Cut Traveller overcrowding in half by 2030
 - Ensure 95% of Travellers have access to tap water in their dwelling by 2030
 - Reduce Traveller accommodation deprivation by 1/3 by 2030
- Implement ethnic equality monitoring, including the introduction of a standardised ethnic identifier in line with the national census, across all statutory and voluntary housing and homeless datasets under their remit. This includes datasets for social housing and accommodation, allocations of social housing and accommodation and on homelessness.

⁹⁵ Housing for All - a New Housing Plan for Ireland, is Ireland's newest housing/homelessness strategy released in September 2021.

See Department of Housing, Local Government and Heritage (2021) *Housing for All - a New Housing Plan for Ireland*. Dublin: Department of Housing, Local Government and Heritage.

⁹⁶ European Commission (2020) [Communication from the Commission to the European Parliament and the Council: A Union of Equality: EU Roma strategic framework for equality, inclusion and participation](#). Brussels: European Commission.

- Ensure adequate funding allocated to Local Authorities to meet their targets in Local Traveller Accommodation Plans and put in place monitoring mechanisms to ensure the accommodation needs of Travellers are met.
- Ensure proportionate amount of the allocated Traveller accommodation budget to the development of new Traveller-specific accommodation.
- Place a moratorium on Traveller evictions and the decommissioning of Traveller-specific accommodation until the accommodation needs of Travellers on Local Authority Housing Lists are met.
- Appoint a National Accommodation Lead (at Senior Level) for Travellers given the disproportionate rates of homelessness.
- Provide multi-annual funding to address Traveller homelessness through:
 - Establishment of regional pilots with dedicated posts within local Traveller organisations to provide homeless and accommodation advice and supports, and to engage with relevant state and voluntary bodies at local and national level; and
 - Traveller specific support workers working within relevant mainstream homeless services.
- Establish joint liaison mechanisms with the Department of Health at national level to address the current and emerging Traveller health inequalities that are compounded by homelessness.
- Ensure that Traveller health and homelessness is addressed bi-annually (at a minimum) by the NTACC and actions identified to address key and emerging issues.
- Ensure full implementation of Housing For All, specifically:
 - In line with Actions 3.11, 3.12 and 3.13 on the health of people who are homeless, include specific measures to support inclusion of Travellers who are homeless in partnership with Traveller organisations.
 - In line with Action 3.8 ensure that guidance is issued to Local Authorities on their Homeless Action Plans prepared under section 37 of the Housing (Misc. Provisions) Act 2009, includes specific guidance on the needs of Travellers who are homeless in partnership with Traveller organisations.
- Introduction of a robust monitoring and evaluation framework to ensure the full expenditure of funds allocated to Local Authorities for Traveller-specific accommodation.
- Ensure that any research on homelessness and accommodation commissioned by the Department explicitly includes the needs of Travellers.
- Undertake an equality impact assessment on the disproportionate impact of HAP on Traveller families.
- Commission intersectional research into the prevalence and consequences of homelessness on Traveller women and children.

Local Authorities, to:

- Report on, and undertake specific actions to address Traveller homelessness in future Traveller Accommodation Programmes (TAPs).
- Align and integrate the Traveller Accommodation Programme (TAPs) targets and actions with actions in Local County and City Development Plans and the Action Plans prepared under Section 37 of the Housing (Misc. Provisions) Act 2009.
- Make provision for current and projected Traveller population and accommodation requirements to ensure that Traveller families are not subjected to long-term homelessness.
- Work in partnership with the HSE Public Health and Traveller Health Units to undertake a health equality impact assessment to inform the development and implementation of Traveller Accommodation Programmes (TAPS).
- Mandate anti-racism and discrimination training for all staff in compliance with Section 42, Irish Human Rights and Equality Act (2014).

...One positive development during the pandemic was the involvement of public health doctors in addressing the poor living conditions of Travellers. The authority they brought to the concerns which have been raised by Traveller organisations over many years was welcomed...



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