



***Information from Member States
on progress in implementing their National Roma Integration Strategies (NRIS)¹***

Please respond (and therefore share with us the results from your own monitoring of the NRIS) by email to JUST-NRCP-COORDINATION@ec.europa.eu **by 30th January 2015 at the latest.**

Submission by Pavee Point Traveller and Roma Centre

Pavee Point is a national non-governmental organisation committed to the attainment of human rights for Irish Travellers and Roma. The group is comprised of Travellers and Roma, and members of the majority settled population working together in partnership. The aim of Pavee Point is to contribute to improvement in the quality of life and living circumstances of Irish Travellers and Roma through working for social justice, solidarity, socio-economic development and human rights. Further information can be found at www.pavee.ie

The All Ireland Traveller Health Study found that there are 36,224 Travellers living in Ireland.² The number of people enumerated as Irish Travellers in Census 2011 was 29,573, an increase of 32% since census 2006.³ Separate to this it is estimated by Pavee Point Traveller and Roma Centre that there are 5,000 Roma living in Ireland. There are no official figures on the population of Roma in Ireland.

Do you agree that your written answer to this questionnaire is published on our website and is therefore accessible to a wider audience? Yes

Would you like this decision on the publication of the contributions on our website to be an individual decision or a collective one? Individual - Collective

(1) Dialogue with regional and local authorities

Could you please share information on progress made on the dialogue with and the involvement of local and regional authorities in the implementation of the National Roma Integration Strategy (NRIS) since 2012?

In particular regarding:

¹ For the purpose of this questionnaire, the term *National Roma Integration Strategy* also covers *sets of policy measures supporting Roma integration*.

² All Ireland Traveller Health Study Team, School of Public Health, Physiotherapy and Population Science, University College Dublin. (2010) All Ireland Traveller Health Study : Our Geels.

Note: This research was carried out by Traveller peer researchers thus enabling a more accurate number of Travellers living in Ireland.

³ This increase was attributed to a greater disclosure amongst the Traveller population as regards their ethnic status and identity following collaboration between Pavee Point and the CSO in implementation of the ethnic question in Census.

- *Translating the NRIS into regional and local agenda (e.g. through local action plans);*
The Irish National Traveller/Roma Integration Strategy has no goals, objectives, targets or indicators. The dialogue in relation to the involvement of local and regional authorities in the implementation of Ireland’s National Traveller Roma Integration Strategy (NTRIS) has been limited to annual requests for information relating to actions relation Travellers and Roma to be provided for the European Commission assessment.

No local actions plans to implement a broad NTRIS have been developed. In the absence of a framework of defined goals, objectives and corresponding actions, a reactive approach to Traveller and Roma inclusion exists where authorities outline any ad hoc actions related to Traveller and Roma. Sometimes actions relating to the general population (but which it is stated that Roma and Travellers can access) are included. This has not allowed for a planned approach whereby actions are planned in consultation with Traveller and Roma, undertaken and then reported back on. The Department of Justice and Equality have committed to addressing this in 2015 and this is welcomed by Pavee Point Traveller and Roma Centre.

There is a local Traveller infrastructure in place but this is underfunded and has largely been dismantled since 2008 due to austerity measures. These are outlined further below. Changes in the operation of local government are currently taking place, however, there are concerns that Traveller and Roma actions may not be prioritised within the new structures.

- *Providing financial support to regional and local authorities;*
- *Supporting the capacity building of regional and local authorities;*
- *Supporting the exchange of experience and mutual learning between local and regional authorities.*

Traveller initiatives at national, regional and local level have experienced significant funding cuts since 2008 under austerity measures implemented by Ireland. The figures in the chart below should be compared to the overall reduction in government current spending of -4.3% over 2008-2013.⁴

| Programmes for Travellers | Loss of funding (2008-2012) |
|---------------------------------------|------------------------------------|
| Interagency activities | -100% |
| Traveller education | -86.6% |
| Traveller accommodation | -85% |
| Equality | -76.3% |
| National Traveller Organisation | -63.3% |
| FAS Special Initiative for Travellers | -50% |
| National Traveller Partnership - | 32.1% |
| Traveller SPY youth projects - | 29.8% |
| Health | -5.4% |

⁴ Harvey, B (2013): Travelling with austerity: Impacts of Cuts on Travellers, Traveller Projects and Services. Dublin: Pavee Point. Note: the report highlights that some state agencies did not even spend all their allocation, so the loss of resources is even worse than that highlighted in the figures.

Funding for Roma inclusion initiatives has mainly come from the Health Services Executive. While such funding has been welcome it is of a small scale and ad hoc. Funding for Roma inclusion has not taken place on a systematic basis across regions or under other areas such as education and training, accommodation, employment and community building.

The Department of Justice and Equality funded a national needs assessment of Roma in Ireland in 2014, which is due to take place in 2015. This is aimed at establishing how best to improve State agencies' interaction with the Roma community. It is been developed in line with recommendation 4.2.3 of the Report of Ms Emily Logan published July 2014 (Garda Síochána Act 2005 (Section 42) (Special Inquiries relating to Garda Síochána) Order 2013. The publication of this report followed the removal of two Roma children from their families in 2013 due to their physical appearance being different from that of their parents.⁵ The progression of a national needs assessment of Roma in Ireland in 2015 will be an important element of developing a progressive and evidence based National Traveller Roma Integration Strategy.

(2) Dialogue with Roma civil society

Could you please share information on progress made on the dialogue with and involvement of civil society and Roma communities in the implementation of the National Roma Integration Strategy (NRIS) since 2012?

There has not been adequate dialogue between the State and Traveller and Roma civil society with regard to the NTRIS since 2012. Many Traveller civil society organisations and Roma groups are not aware of the content of the EU Framework for National Roma Integration Strategies or the NTRIS.

In particular regarding:

- *Supporting the capacity building of Roma civil society;*
- *Involving Roma civil society (including youth organisations) in the planning, implementation and monitoring of action plans/measures (e.g. through national platforms, consultations etc.);*
- *Supporting the involvement of Roma (communities) in the implementation of the NRIS (e.g. by supporting community building efforts of local authorities/civil society).*

There have been no Roma involved in the implementation of the National Traveller Roma Integration Strategy. Roma civil society is very under supported and currently there is no option for Roma to feed into national policy in a structured way. Funding is required for capacity building projects with Roma in Ireland. Such projects should be built on principles of community development and the 10 Common Basic Principles on Roma Inclusion.

The Department of Justice has committed to Roma representation at a national level in a new structure which will be developed under the National Traveller and Roma Policy

⁵ The report can be accessed at <http://www.justice.ie/en/JELR/Emily%20Logan%20report.pdf/Files/Emily%20Logan%20report.pdf>

Division (re-named from the National Traveller Policy Division in December 2014) in 2015. This would be welcomed by Pavee Point.

While there is a strong Traveller civil society in Ireland, the development of the NTRIS has done nothing to further support capacity building of Traveller civil society. There are a number of policy structures developed for dialogue with Travellers in existence. These were all in existence before 2011 and none have discussed the National Traveller Roma Integration Strategy as part of their ongoing work.

The Department of Justice and Equality have acknowledged weaknesses in existing structures, including lack of accountability, decision-making powers and impact. The Department has committee to re-structuring of such bodies and linking the work of these bodies to a National Traveller Roma Integration Strategy in 2015.

(3) Allocating European Structural and Investment Funds (ESIF) for Roma inclusion in the 2014-2020 period

Could you please share information on the proposed approach followed for utilising European Structural and Investment Funds (ESIF) in 2014-2020 for the implementation of the National Roma Integration Strategy (NRIS)?

In particular:

- How will the possibilities offered by the ESIF legal framework be utilised (e.g. territorial targeting, community-led local development, and sustainable urban development)? How will an integrated approach be assured (e.g. through multi-fund programmes or mechanisms coordinating separate programmes)?*
- Which Operational Programmes - if any - have chosen the ESF⁶ specific investment priority "socio-economic inclusion of marginalised communities such as the Roma"? What is the total amount allocated to this investment priority?*
- Which other relevant ESF, ERDF⁷ or EAFRD⁸ investment priorities have been selected for specific objectives which include Roma among the main target groups? Which are the Operational Programmes involved? Can other relevant mainstream specific objectives be identified (e.g. health or education)?*
- How will ESIF be used to address policy issues raised in Roma-related Country Specific Recommendations (CSRs)?*
- What steps are being taken, including amounts available, to enhance implementation compared to 2007-2013 (e.g. strengthening of capacity of local and regional authorities and of civil society to implement projects)?*
- Are you able to quantify the total amount of ESIF funds that could potentially be used for Roma integration measures (targeted and mainstream)?*

Information not available.

(4) Reinforcing the role of the National Roma Contact Point (NRCP)

Could you please share information on what steps have been taken to reinforce the mandate/ resources/coordination role of the National Roma Contact Point since 2012?

In particular:

- What measures have been taken, if necessary, to increase the financial and the human resources available for the National Roma Contact Point so that it can effectively coordinate the cross-sectorial monitoring of Roma integration policies with a view to their implementation?*
- How has the NRCP been / is planned to be involved in decision-making processes regarding the development, funding and implementation of relevant policies?*
- How has the NRCP been/is planned to be involved in the programming and implementation structures of the European Structural and Investment Funds 2014-2020?*

Information not available.

⁶ European Social Fund

⁷ European Regional Development Fund

⁸ European Agricultural Fund for Rural Development

(5) Fighting discrimination effectively

Could you please describe the main measures taken since 2012 to fight discrimination in the four key areas of education, employment, healthcare and housing?

In particular:

- What policies and measures have been put in place to combat segregation at national, regional and local level?*
- What measures have been implemented to combat discrimination and prejudice against Roma?*

There have been no new measures to combat discrimination under the four pillar areas since 2012. The National Action Plan Against Racism (2005-2008) has not been renewed. Despite this the National Action Plan was referenced as part of Ireland's commitment to human rights as a member of the Human Rights Council in 2012.⁹ The failure to renew the National Action Plan has been noted as a concern by the European Commission on Racism Intolerance (ECRI) in its most recent report on Ireland, 2013. The Irish Government has noted that it does not intend to develop a new National Action Plan and will instead incorporate anti-racism measures into a new Migrant Integration Strategy. However, an explicit National Action Plan Against Racism is needed, in recognition that there is a wider group in Irish society that experience racism, including Irish Travellers and other non-migrants.

There remains a significant gap in the availability of reliable and comprehensive data in relation to the socio-economic, political and legal situation of Traveller and Roma communities.¹⁰ This is crucially linked to the lack of disaggregated data in Ireland based on ethnicity. Currently, ethnicity is not included as an administrative category in official data collection systems. This results in serious gaps in knowledge about the situation and needs of Travellers and Roma and absence of evidence based policies and practices to ensure the needs of minority ethnic communities are met. The lack of data contributes to significant obstacles in gathering evidence about racism and discrimination, making it difficult for relevant stakeholders to monitor effectively the implementation of any measures to combat discrimination.

- What steps have been taken to promote the social, economic, political and cultural participation of Roma in society, including at local level?*

Despite the recommendations of many UN treaty monitoring bodies (CERD; CEDAW; Children; Human Rights Committee), and that of a range of European institutions (ECRI, FCPNM; Council of Europe) as well as equality and human rights bodies within Ireland, the Government continues to refuse to acknowledge Traveller ethnicity. Various countries also made recommendations for recognition during the UPR process in 2011. All the national Traveller organisations in Ireland are calling on the government to recognise Travellers as a minority ethnic group.

⁹ Letter dated 13 April 2012 from the Permanent Representative of Ireland to the United Nations addressed to the President of the General Assembly.
<https://www.dfa.ie/media/dfa/alldfawebsitemedia/ourrolesandpolicies/pledges-and-commitments-during-election-to-hrc.pdf>

¹⁰ See Pavee Point Ethnic Data Monitoring Initiative, <http://www.paveepoint.ie/resources/data-portal/>

The lack of recognition of Travellers as a minority ethnic group has been accompanied by a denial of the racism that Travellers experience. Racism is at the heart of the exclusion facing Travellers; to say otherwise is to deny the reality of Travellers lived experiences and only serves to further marginalise Travellers. Travellers are not automatically included in initiatives to address racism and promote interculturalism. Recognition is of great symbolic and practical importance for Traveller inclusion in Ireland.

Travellers also feel disillusioned by the political process. The lack of Traveller representation in political decision-making has been recognised by the CERD who recommended in 2005 and 2011 that Ireland adopts “affirmative action programmes that seek to improve the representation of Travellers in political institutions.” There are no Traveller or Roma representatives in our national parliament.

In 2014 major concerns exist in relation to discrimination against Travellers and Roma.

Health

The All Ireland Traveller Health Study (2010) reported the following findings:

- Life expectancy at birth for male Travellers has remained at the 1987 level of 61.7 which is 15.1 years less than men in the general population, representing a widening of the gap by 5.2 years.
- Life expectancy at birth for female Travellers is 70.1 which is 11.5 years less than women in the general population.
- Traveller infant mortality is estimated at 14.1 per 1,000 live births. This is a small decrease from an estimated rate of 18.1 per 1,000 live births in 1987. Over the same time period the general population infant mortality rate has reduced from 7.4 to 3.9 per 1,000 live births.
- Travellers, in particular males, continue to have higher rates of mortality for all causes of death.
- Traveller suicide rates are seven times higher than in the general population.¹¹

Despite this evidence, the government has failed to take concerted action to address the health inequalities that Travellers face and adopts a “mainstreaming approach”, which ignores disparities in health outcomes. The Department of Health National Traveller Health Advisory Committee (which had Traveller organisation representatives), has not been convened since October 2012, at a time when major reform is taking place within health services in Ireland with the establishment of new Health Directorates. Despite the evidence that Travellers experience the worst health status in Ireland, Traveller health is not a priority among health planners and the budget for Traveller health developments has been used for mainstream health services.

Many Roma in Ireland do not have access to medical cards. This is related to a lack of access to social protection and an inability to prove their means when applying for a medical card. The result is lack of access to basic GP care, as without a medical card this is very costly. Roma women report inability to access GPs and being afraid to use

¹¹ Kelleher et al (2010) *Our Geels, All Ireland Traveller Health Study*, University College Dublin & Department of Health & Children.

accident and emergency or maternal health services in case they receive bills for treatment. Women report receiving conflicting reports in relation to payment for maternal services and a lack of knowledge of the Maternity and Infant Care Scheme.

Lack of financial resources or state support, combined with a lack of clear accessible information, and a lack of trust in maternal and broader health services all impact on engagement with pre and post-natal services. Many women delay accessing care to a late stage of pregnancy. The first point of contact for Roma women with a health service can be in the A&E ward of a maternity hospital when already in labour. Women also report fears of children being taken away from them if they engage with health practitioners, particularly if they are living in poverty and overcrowded accommodation. The removal of two blonde Roma children from their families in October 2013 has further exacerbated fears within the community. As a result, public health nurses often experience difficulties tracking mothers of new born babies when mothers make themselves inaccessible upon visits. This can mean children do not get vaccinations. This affects women's health, children's health and public health more widely. Also, accessing nutritious food and buying clothes and nappies for a new baby can be extremely challenging.¹²

Education

Census 2011 shows that 55% of Travellers leave school before the age of 15 and less than 1% of Travellers go on to third level education. The Report on the First Phase of the Evaluation of DEIS (2011) found that the educational attainment of Travellers remains significantly lower than that of their settled peers in both reading and mathematics. The magnitude of the difference between the scores of the two groups is large in every case.

In Budget 2011, Traveller specific education supports were cut by 86.6%. The Visiting Teacher for Travellers Service (VTTS) was cut by 100%, resulting in the loss of 40 posts. Resource Teachers for Travellers (RTT) were cut by 100% resulting in the withdrawal of 710 teaching posts. To compensate for the withdrawal of RTT, 141 alleviation posts were made available however these teachers are not specifically for Travellers. In total 569 teaching positions were cut. 33 Senior Traveller Training Centres were closed. Since 2011, there has been a 20% cut to the school completion programme (SCP). The SCP works in 470 primary and 223 post-primary schools to implement educational interventions for approximately 36,000 students. Given the rates of early school leaving among the Traveller population these cuts will have a significant impact on school completion.

The budgetary cuts in Traveller education are disproportionate compared to financial cutbacks of other mainstream educational cuts. These cuts are short sighted and display a disregard for the Traveller child and young Travellers and their future life chances.

Racism and discrimination towards Travellers in wider society is reflected within the education system and continues to present a significant barrier for Traveller students. The All Ireland Traveller Health Study (AITHS) found that 62% of Travellers experienced

¹² Pavee Point (2014) Challenging Barriers and Misconceptions: Roma Maternal Health in Ireland, p 4-7.
<http://www.paveepoint.ie/temp/site3/wp-content/uploads/2013/11/Roma-Maternal-Health-in-Ireland.pdf>

discrimination in schools. Identity based bullying by other students poses a significant problem. The 2012 State of the Nation's Children report found that Traveller children, immigrant children and children with a disability are more likely to report being bullied at school.

There is currently no framework or provision within the education system to address underlying issues impacting on Roma children's participation including poverty, the lack of access to social welfare payments and the history of educational disadvantage which many Roma have faced. A response is required which takes into account the specific needs of Roma children. This point was highlighted by the Irish National Teacher's Organisation (INTO),

...it has been a continuous struggle at international level to maintain the inclusion of Travellers in Roma/Gypsy resolutions and initiatives in the Council of Europe, the European Union and United Nations. That battle now appears to have been won and it is therefore, disappointing to note that Roma children are not offered the same supports or benefits as Travellers in the Irish education system.¹³

Proposed legislation will require schools to include an explicit statement in their enrolment policies that they will not discriminate against an applicant on a number of grounds including membership of the Traveller community. However, Traveller groups are concerned that certain provisions in the draft legislation will impact negatively on Traveller children, in particular the 'past pupil criterion' as Traveller parents are much less likely to have gone to secondary school.¹⁴ The percentage of Irish Travellers with no formal education was 17.7 per cent in comparison to 1.4 per cent of the general population so the inclusion of such a clause will perpetuate the lower participation rate for Travellers. This policy also poses a significant challenge for Travellers who are nomadic and are therefore unlikely to have had a family member previously attend the school in question. It is also a significant barrier for all immigrant children including Roma as it is very unlikely that their parents would have attended school in Ireland.

Accommodation

The Housing (Traveller Accommodation) Act 1998 requires each local authority to prepare and adopt a five year plan for the provision of Traveller accommodation in their area. These plans have consistently failed to meet their targets and no sanctions or accountability mechanisms are imposed when targets are not met. The Housing (Miscellaneous Provisions) Act 2002 makes it illegal for Travellers to set up a 'temporary dwelling' on either private or public land without permission. A person can be prosecuted with trespass under this legislation introduced, which has essentially had the effect of prohibiting Travellers from travelling.

¹³ Irish National Teachers Organisation, *Traveller Education: INTO policies and proposals updated*, Dublin: INTO, 2010

¹⁴ Irish Traveller Movement (2013) *Submission to Joint Oireachtas Committee on Education and Skills re Draft General Scheme of an Education (Admission to Schools) Bill 2013*, Dublin: Irish Traveller Movement.

Budgetary allocations for Traveller-specific accommodation been significantly reduced with capital spending falling from €40 million in 2008 to just €4 million in 2013.¹⁵ This decline in funding is compounded by the consistent underspending by local authorities on Traveller Accommodation.

There is little evidence in relation to Roma accommodation. However, anecdotal evidence shows Roma families living in overcrowded and inadequate accommodation in the private rented sector.

Employment and social protection

Travellers and Roma face huge barriers to accessing employment in Ireland. Census 2011 revealed a Traveller unemployment figure of 84.3%. There are no available figures on Roma unemployment, yet anecdotal evidence suggests that this figure is also extremely high.¹⁶ Despite this there is no employment strategy for Travellers or Roma in Ireland.

In the field of employment, the national training authority, FAS initiated in 2005 the Special Initiative for the employment of Travellers, sometimes called FAS SIT. This was mainstreamed in 2011. The “Travelling Austerity” report notes that eight projects were still reportedly running in 2012, but we have no information on Traveller participation after this point. The report also notes that the Department of Social Protection also had an Activation and family support line, €510,067 in 2008, a small grant fund enabling work with unemployed Travellers. “No figures are available of allocations or spending since then, nor of the outcomes. The internship scheme in government departments, which was popular and over-subscribed, was discontinued.”¹⁷

Many Roma find it difficult to gain employment due to factors including racism, discrimination and lack of training and formal education. There is a lack of vocational training options for Roma in Ireland. There is no clear strategy to facilitate Roma participation in mainstream training programmes. Many Roma may have very poor experiences of education and may also have an added difficulty of not speaking and writing English. Therefore, extra support is needed to facilitate completion of employment training programmes.

For Roma who are unable to find employment, many have no access to social protection. Habitual residence is a condition which applicants must satisfy in order to qualify for certain social welfare assistance payments, including child benefit. Habitual residence essentially means an applicant must be able to prove a close link to Ireland.¹⁸

¹⁵ Pavee Point, (2013) *‘Travelling with Austerity’: Impacts of Cuts on Travellers, Traveller Projects and Services*, Dublin: Pavee Point, p.25

¹⁶ Health Service Executive and Pavee Point (2012) *Roma Communities in Ireland: Child Protection Considerations*, Dublin: HSE and Pavee Point.

¹⁷ Pavee Point (2013) *‘Travelling with Austerity’: Impacts of Cuts on Travellers, Traveller Projects and Services*, Dublin: Pavee Point.

¹⁸ Five factors are considered to determine habitual residence:

- a. the length and continuity of residence in the state or in any other particular country;
- b. the length and purpose of any absence from the state;
- c. the nature and pattern of the person’s employment;
- d. the person’s main centre of interest;

Application of the habitual residence condition has placed migrants, Travellers (who move across jurisdictions, generally from the UK to Ireland) and Roma in Ireland (and indeed returning Irish immigrants) in very vulnerable positions, whereby they cannot access any support services. It has had a particular impact on Roma in Ireland, whereby many Roma have been unable to access any social supports. This has the knock on effect of blocking some people from accessing medical cards to allow for access to a GP and from getting housing assistance. In this context many Roma do not have access to basic primary care and are living in unsuitable and overcrowded housing conditions.

It has a particular negative impact upon women experiencing violence and children. For women trying to leave a situation of violence, if they do not meet the habitual residence condition, they are unable to access a refuge beyond an emergency period. This has resulted in women being forced to stay in violence situations due to economic circumstances.

Despite the fact that Child Benefit is described as a ‘universal’ payment, as it is subject to the Habitual Residence Condition, certain groups of children are denied social protection because of their parents’ status. This is pushing children into poverty. Pavee Point’s engagement with social workers would suggest that this is causing child protection issues where parents/guardians are unable to provide adequate shelter and food for their children.¹⁹

Concerns about HRC have been raised by the Special Rapporteur on extreme poverty and human rights she has stated in her 2012 report that she ‘encourages the Government to review the impact of the condition as a matter of priority.’ ECRI has also recommended that Irish authorities review the impact of HRC.²⁰ This has still not taken place and the Department of Social Protection has stated that it does not intend to undertake a review of the impact of the HRC.²¹

Children

Many Roma children are living in poverty are not living in adequate living conditions with access to food and basic medical services. This is resulting in a situation where social workers have to consider taking a child into care in order to access basic supports. There is no statistical information on Roma care or the number of Roma in Ireland, therefore it is not possible to ascertain if they are overrepresented in care at present.

(6) Monitoring transformation and enabling policy adjustment

Could you please share information on what steps have been taken since 2012 to further develop a robust monitoring system of the National Roma Integration Strategy (NRIS)?

In particular:

e. the future intentions of the person concerned as they appear from all the circumstances.

¹⁹ Health Service Executive and Pavee Point (2012) *Roma Communities in Ireland: Child Protection Considerations*

²⁰ See UNGA (2012) Report of the Special Rapporteur on extreme poverty and human rights, Magdalena Sepúlveda Carmona, A/HRC/20/25 Para 102 & ECRI (2013) Fourth Report on Ireland, CRI(2013)1 Para 130.

²¹ A Departmental working group was set up in June 2010 to review the **operation** of the habitual residence guidelines. However, this review did not examine the impact of the habitual residence condition.

- *Please, briefly describe the monitoring mechanism and how the different stakeholders are involved in this monitoring structure;*

There is no existing monitoring structure or mechanism for the NTRIS that is in the public domain. At present it seems that Departments and agencies annually give details of any work related to Travellers/Roma or other equality measures. This is not related to the existing National Traveller Roma Integration Strategy.

- *Please, give examples of key indicators used to monitor progress towards the targets of the NRIS;*

There are no targets identified in Ireland's NTRIS. There is also no monitoring framework or identified indicators in the public domain.

- *Please, briefly describe how the monitoring is linked to the monitoring of the European Structural and Investment Funds in the 2014-2020 period.*

Not applicable as the framework is not in place to link to monitoring of European Structural and Investment Funds in 2014-2020 period.

(7) Main challenges and successes

Please give an example of a key challenge the NRCP is facing and a key success achieved related to any of the above areas.

It is our contention that between the period of 2011 when the Framework document was produced and the end of 2014, that no new actions or strategic approach was implemented in the context of the National Roma Integration Strategies. In fact, during this time severe austerity measures have further undermined the situation of Travellers and Roma in Ireland.

Activities that have been reported to the European Commission by Ireland have a number of features:

- Most were taking place well before 2011 and so bear little relation to the NTRIS
- Some initiatives described in Ireland's NTRIS have since ceased due to funding cuts
- Due to the lack of strategic framework in Ireland's NTRIS, Departments and agencies are simply submitting narratives on any activity relating to Travellers/Roma in Ireland.
- Gaps in Traveller policy and lack of implementation of progressive policy remain a factor since before 2011
- Travellers are still not recognised as a minority ethnic group
- Roma are still marginalised within the policy framework and systematic policy measures to include Roma and realise their human rights are not in existence
- Negative implications of general policies for Roma have a huge impact – i.e Application of the habitual residence condition for those applying for social protection.
- There is no visible gender perspective within the National Traveller Roma Integration Strategy. The other grounds on which Travellers and Roma will face discrimination including age, disability, sexual orientation and gender identity and others are also not included in the strategy.

Up until late 2014 there has been a complete failure by Ireland to acknowledge the opportunities and potential offered by the EU Framework document.

As of late 2014/2015 there are plans by the Department of Justice and Equality to address some of the issues outlined above. These are welcomed by Pavee Point Traveller and Roma Centre:

- An interdepartmental working group to implement the findings of the Logan report (on the removal of Roma children from their families) was developed in 2014.
- The Minister spoke of a new era of consultation with Roma which is very welcome.
- The Traveller policy division is now to be called the Traveller and Roma policy division. A national needs assessment of Roma in Ireland is to take place.
- A new Traveller and Roma infrastructure is to be developed in the form of a National Traveller Roma Integration/Inclusion steering group. This is to be chaired by the Minister with responsibility for equality.

These are positive developments and commitments which would have an impact in 2015. Pavee Point is committed and looks forward to working in partnership with the Department of Justice and Equality and other relevant Departments towards the full inclusion of Travellers and Roma in Irish society.

(8) Additional information

You are invited to share any additional information or concern (regarding for instance measures taken in response to the assessment by the Commission in its report of June 2013, not mentioned before).

In this context of the above information Pavee Point recommends the following:

- Formally recognise Travellers as a minority ethnic group.
- Evidence based policy-making for Traveller and Roma based on the Common Basic Principles on Roma inclusion.
- Revise the National Traveller Roma Integration Strategy as per the EU framework document with goals, targets, indicators and a monitoring framework. Ensure discrimination and the cross-cutting issues of gender and other forms of discrimination are addressed within the strategy. Address gaps in Traveller policy and develop a policy framework for the inclusion of Roma in Irish society so as to address inequalities between Travellers, Roma and the general population in relation to the four pillars of education, employment, health and accommodation.
- Setting up a NTRIS steering group to develop a progressive NTRIS in line with human rights and equality obligations of the member state.
- Set up a forum for Roma representatives to be involved in national policy making – with parallel funding mechanisms for Roma capacity building.
- Provide adequate funding for the operation of Traveller and Roma civil society and counteract the austerity measures that have decimated the Traveller movement since 2008.
- Ensure the Travellers and Roma are specifically named and prioritised in new plans under the reformed local government structures. Measures need to be outcome based and this requires the development of an ethnic identifier across administrative systems.

