

IMPLEMENTATION OF TRAVELLER POLICY:

Terrain for Imagination and Challenge



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Implementation of Traveller Policy: Terrain for Imagination and Challenge

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The researchers dedicate this report to the memory of Ronnie Fay, formerly Co-Director of Pavee Point Traveller and Roma Centre, who provided the initial impetus for the research. Ronnie was a formidable and effective leader and champion for equality and human rights for Travellers. She was adept at identifying the change required to make progress on equality and human rights, she was creative in modelling what this change would involve, and she was ever determined in pursuit of the practical implementation of such change.

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Foreword

This timely research offers an opportunity to pinpoint, articulate and outline an agenda for addressing the factors which impede implementation of policies relevant to Traveller and Roma inclusion.

It is timely because discrimination and disregard for Travellers remain a daily lived experience for us all. Also the state's key instrument for policy naming, coordination and implementation - the National Traveller Roma Inclusion Strategy - is now long overdue for renewal.

This research looks at issues of conflict and ambiguity in relation to Traveller policy in accommodation, health and education. In this context the research identifies the importance of effective local coalitions, involving state and civil society stakeholders, as key drivers for successful policy implementation. In some cases existing structures need to be enhanced and in others new spaces or structures are required.

The research emphasises the need for clarity and to ensure approaches that involve both mainstream and targeted measures; an intercultural approach that recognises and takes account of Traveller culture and identity and an approach that addresses racism experienced by Travellers and Roma at both the individual and systemic levels.

The research also identifies the important role of national level stakeholders in enabling the local level to drive policy implementation. These roles include ensuring national Traveller policy is in place, resourcing the development and work of local coalitions and extracting learning from local models of policy implementation to inform national guidance. National enabling structures need to be strengthened and to play a lead role in developing and promoting national guidance - with particular roles for national bodies in the field of equality and human rights.

The collaboration between Traveller organisations and the state, as well as the nationwide consultations which Pavee Point supported, led to the development of the current National Traveller Roma Inclusion Strategy 2017/2021. This lists 149 actions and includes a framework for Traveller organisations' ongoing involvement in monitoring implementation.

Overall implementation of the actions has remained patchy and insufficient to begin the changes essential for Traveller and Roma full equality.

The Strategy was also Ireland's response to the EU Roma Strategic Framework for Equality, Participation and Inclusion 2020 to 2030. The state's updated Strategy in response to this EU Strategic Framework is now a year overdue.

Work on a new Strategy needs to begin immediately and it needs to incorporate the findings of this research, and the key role it identifies for Traveller organisations in developing, implementing and monitoring policy and actions, to enhance Traveller and Roma equality.

I acknowledge the role of the lead Government Department of Children, Equality, Disability, Integration and Youth, but this has not been matched by action from other government departments which will be essential to achieve outcomes.

On behalf of Pavee Point, I thank all involved with this research. The time given by the advisory group of national Traveller organisations was especially helpful. I particularly thank all who gave their insights in interviews and responses to the researchers. Pavee Point will strive to ensure that the research contributes to a better future.



Martin Collins
Co Director, Pavee Point Traveller & Roma Centre





Executive Summary

This research aims to analyse gaps and challenges in the implementation of national Traveller-focused policy, with a view to establishing strategies for strengthening policy implementation. It is undertaken in a context where Travellers experience outcomes of inequality across the full spectrum of policy fields, and on the understanding that equality and human rights for Travellers remain an imperative for both policy making and policy implementation. These unequal outcomes point up issues of significant policy implementation failure, which serve as the starting point for this research.

Three policy fields are examined: accommodation, health, and education (primary and post-primary levels). Matland's (1995) conflict-ambiguity model is applied in analysing the policy implementation issues, for each policy field. The conflict-ambiguity model posits that, depending on the level of conflict and ambiguity associated with a policy, testable predictions can be made in regard to how the implementation process is likely to unfold. These predictions, in turn, point to directions of travel required in order to strengthen policy implementation.

Policy conflict can encompass overt opposition, as well as incompatibility of objectives, and/or lack of agreement on policy framing or on the most effective means of policy implementation. Ambiguity is about levels of clarity, that can reflect deliberately vagueness to avoid conflict, limited understanding of policy goals, and/or uncertainty about organisational roles or tools to be used in policy implementation. Policy conflict and/or ambiguity can, thus, arise in regard to the proposed goals and objectives of a policy and the means through which the policy is to be implemented.

The analysis conducted for this research found that policy implementation, in each the three policy fields examined, is characterised by high conflict and high ambiguity. In such a scenario, according to the model, the implementation process that is likely to unfold or be unfolding is one of 'symbolic implementation'. This refers to policies that invoke what Matland refers to as "highly salient symbols". In these instances, the 'symbols' invoked relate to Traveller culture and identity, the recognition of cultural difference, and the acknowledgement of its practical implications.

Across the three policy fields examined, high policy conflict is evident in regard to: the identification, role and primacy of the national driver for policy implementation; and the need for a dual approach to policymaking and implementation, involving an interlinking of mainstreaming and targeting measures, and the balance of emphasis between these two strands. In the accommodation policy field, there is further conflict in relation to the nature of the policy goals and objectives themselves. In the health policy field, there is further policy conflict in relation to pursuing an approach to policymaking and implementation that addresses the social determinants of health. In the education policy field there is further conflict in relation to an understanding of interculturalism as encompassing a dual focus: on cultural difference and on addressing racism, rather than a sole focus on cultural difference.

In the policy fields of health and education, policy ambiguity results from the absence of defined national Traveller policies to mark out and underpin the symbol of Traveller culture and identity, and to address its practical implications. In the field of accommodation, a similar policy ambiguity pertains, resulting from different perspectives on the nature and validity of the identification of Traveller accommodation preferences. In the health and education policy fields, policy ambiguity

is evident in regard to understandings of targeting and mainstreaming, whereby policymakers deem a broad targeting of disadvantage as sufficient to capture Traveller needs, with limited or no attention to the specific issues of cultural difference and racism that shape Travellers' experience of disadvantage. In the accommodation policy field, a similar policy ambiguity pertains in regard to the need to address the practical implications of cultural difference in mainstream housing provision and policy on homelessness. In the health policy field there is further policy ambiguity on foot of major health sector reforms under Sláintecare.

In a context of high policy conflict and ambiguity, delivery-level 'coalition strength' is identified, in the model, as the key driver for outcomes and more effective policy implementation, based on the goals of achieving equality and fulfilling human rights. Such 'coalition strength' will depend on local factors, therefore, local approaches to policy implementation and, therefore, implementation outcomes will vary. In such a scenario, the role of national-level policy implementation actors would usefully give priority to creating the conditions for, and supporting effective outcomes from local-level coalition building.

Local level coalitions do not implement policy, that remains the task of the responsible public body or institution. Local level coalitions should serve to drive, inform and ensure this policy implementation.

At the local delivery level, coalition builders need to be identified, resourced and enabled. Traveller organisations have a key role as coalition builders and, as such, need to be appropriately resourced to make this contribution. Similarly, professionals within key local statutory services have potential as coalition builders. Capacity-building, to enable necessary awareness and knowledge, alongside management support, are needed to enable their contribution in this regard.

Spaces or structures for local coalition building need to be identified/established, and resourced, in a manner that secures their influence and impact on policy implementation. In regard to the health and accommodation fields, existing structures, such as the Traveller Health Units, and the Local Traveller Accommodation Consultative Committees could be evolved to serve as such spaces. The evolution required of these structures would need to focus on enhancing their role, scope, powers, influence, resources, composition and capacity, if they are to serve as effective spaces for such coalition-building.

New spaces or structures are required in the education field, as there is no such tradition of this nature at local level to-date. Initiatives taken by some Traveller organisations, pilot projects under the National Traveller and Roma Inclusion Strategy (NTRIS), and the work on education of a small number of Traveller Interagency Groups provide some pointers in this regard.

Coalition themes, or models of policy implementation, that resolve current conflicts and ambiguities affecting policy implementation, need to be developed and pursued, or sustained. In particular, such themes need to address: the dual policy approach of interlinked mainstreaming and targeting measures, ensuring a balance of attention to both; the intercultural approach, where policy implementation includes a focus on recognition for and understanding of Traveller culture and identity alongside a focus on understanding and addressing racism at the individual and systemic levels; the targeted approaches to disadvantage that could achieve outcomes for Travellers, where policy implementation includes a focus on addressing racism at the individual and systemic levels, and a concern to take account of cultural difference; and a social determinants approach to addressing health inequalities. Local coalitions would usefully agree on the design for such models and ensure that they are effectively applied.

Finally, local action-planning needs to be pursued through and by these local coalitions, in their implementation of national Traveller policy strategies. These national policy strategies need to be designed to allow for and enable this.

At the national level, under this model, where local coalition strength is the key driver for policy outcomes, policymakers need to ensure that Traveller-focused policy is in place that invokes the key symbol of Traveller culture and identity, setting out how this culture and identity is to be recognised in the particular policy field and the approach to be pursued in addressing its practical implications with a view to achieving equality and fulfilling human rights.

National level actors, in each of these policy fields, need to enable and resource local coalition-building. They also need to put in place dedicated organisational units with responsibility for specific Traveller policy, at national and local level, with adequate resources, seniority of staff, and reach across the organisation to ensure mainstreaming. They need to implement an ethnic identifier, in key data systems, to track and monitor progress of policy implementation. More specifically, the Department of Children, Equality, Disability, Integration, and Youth needs to put in place a dedicated unit with adequate human and financial resources to enable implementation of a new National Traveller and Roma Inclusion Strategy;

National bodies with relevant regulatory functions, that have been proactive in the field of Traveller policy, such as the Office of the Planning Regulator, the Irish Human Rights and Equality Commission, and the Ombudsman for Children's Office, need to continue to play such a role in ensuring effective policy implementation. They are national guardians for the core underpinning planning, equality and human rights standards that need to shape and drive policy implementation.

National structures that enable participative approaches to policymaking, policy implementation and policy monitoring are important under this model. These national structures require further evolution to strengthen their effectiveness for this model, currently varying in scope, capacity, and influence. They currently include: the National Traveller Accommodation Consultative Committee, the National Traveller Health Advisory Forum, and the education subgroup of the NTRIS. Such structures, in an evolved form, need to play a lead role in developing and promoting new national guidance and standards to ensure coherence, based on the experience of and the models developed by local coalition structures.

The NTRIS structures will have an important contribution to make to policy implementation under this model, in enabling interdepartmental and interagency coordination and collaboration at national level and stimulating coalition building at local level. This contribution could be developed in the post-2022 strategy and could include a focus on policy implementation and strategies to secure policy implementation, making use of this research in doing so. This might further and usefully serve to put the issues of policy implementation and strategies to secure policy implementation at national level, on the European agenda, within the structures that function in relation to the European Union Roma Strategic Framework.

Finally, in a context, where local coalition strength and organising for this, is central to securing policy implementation, local Traveller organisations need to be recognised as key actors. A programme of national funding to enable local Traveller organisations to play an effective and strategic role for this approach is essential.



01



research

Introduction

1.1 RESEARCH AIMS

A growing civil society contribution to policy thinking and policy formation, by Traveller organisations, is evident from the time of the Report of the Task Force on the Travelling Community in 1995 and the policy developments on foot of this report. This influence continues to date, in relation to the more recent cross-government National Traveller and Roma Inclusion Strategy (2017-2021).

While deficiencies remain in policy thinking and policy formation, these are currently overshadowed by limitations in regard to the policy implementation process. This situation is compounded by a failure to grapple effectively with policy implementation issues that have become evident.

Traveller organisations in pursuit of equality and human rights policy outcomes for their community, have afforded a priority to reviewing and communicating the consequences of policy implementation failure. Such a focus is understandable in a context of significant and entrenched inequalities for Travellers across key policy domains. There has, however, been a more limited focus on the policy implementation process. This research seeks to address this gap.

This research aims to analyse the gaps and challenges in regard to the implementation of national Traveller-focused policy with a view to establishing strategies for strengthening such policy implementation processes. Three policy fields are examined in specific detail: accommodation, health, and education (primary and post-primary levels).

The research is undertaken in the context of the publication of the EU Roma Strategic Framework for Equality, Participation and Inclusion for 2020-2030¹. This invites Member States to develop, adopt and implement national Roma Strategic Frameworks by September 2021. This will lead to the development of a further iteration of the National Traveller and Roma Inclusion Strategy². This European context provides a positive environment within which to address any research outcomes in relation to Traveller policy implementation.

1.2 RESEARCH APPROACH AND METHODOLOGY

The research applies Matland's (1995) conflict-ambiguity model in each of these policy fields. This model posits that, depending on the level of conflict and ambiguity associated with a policy, testable predictions can be made in regard to how the implementation process is likely to unfold, which, in turn, point to directions of travel required in order to strengthen policy implementation.

The model does not ignore the individual policy implementation variables that have been a predominant focus in the various analyses undertaken of Traveller-focused policy implementation, but takes a more comprehensive approach. It seeks to go beyond these individual variables to examine the conditions within which such variables become more or less important for the policy implementation process.

1 *A Union of Equality: EU Roma Strategic Framework for equality, inclusion, and participation 2020-2030, COM(2020) 620 final, Communication from the European Commission to the European Parliament and the Council, Brussels, 2020.*

2 *The current National Traveller and Roma Inclusion Strategy is under review, which is to inform the development of the next iteration. As such, the National Traveller and Roma Inclusion Strategy 2017-2021 remains current.*

The research methodology included:

- Desk research to review the literature on: policy implementation and factors associated with policy implementation failure; and, specifically, policy implementation regarding Traveller-specific policy.
- Desk research to review the particular policy fields of Traveller accommodation, health, and education, in particular, material focused on the possible causes of policy implementation gaps.
- One-to-one semi-structured interviews with thirty key stakeholders involved across the three policy fields examined. Of the thirty individual stakeholders interviewed:
 - 10 interviewees were involved with Traveller organisations (3 national organisations and 5 local organisations); and
 - 20 interviewees were public/civil servants (11 working at national level and 9 working at regional/local level).

The stakeholders interviewed were as follows:**NATIONAL-LEVEL:**

- Three national-level statutory policy stakeholders in the Traveller accommodation policy field,
- Five national-level statutory policy stakeholders in the Traveller education policy field,
- Four national-level statutory policy stakeholders in the Traveller health policy field, and
- Four national-level policy stakeholders involved in diverse Traveller policy areas: of these, two were national Traveller organisations and two were statutory policy stakeholders.

REGIONAL/LOCAL-LEVEL:**Accommodation:**

- Four representatives from three local Traveller organisations (working in three different counties) involved in policy implementation in the Traveller accommodation policy field.
- Three staff members from statutory organisations (working in three different counties) involved in policy implementation in the Traveller accommodation policy field.
- One NGO policy stakeholder involved in policy implementation in the Traveller accommodation policy field.

Education:

- Two representatives, one current and one former, from two local Traveller organisations (working in two different counties) involved in policy implementation in the Traveller education policy field.
- One staff member from a statutory organisation (working in one county) involved in policy implementation in the Traveller education policy field.

Health:

- One representative from a Traveller organisation involved in policy implementation in the Traveller health policy field.
- Two staff members from statutory organisations (working in two different counties) involved in policy implementation in the Traveller health policy field.

Interviews were conducted online, over the period December 2021 to April 2022.

It was agreed that interviewees would be afforded anonymity to encourage them to speak freely in attempting to understand the issues involved in policy implementation across the three policy fields.

Interviews were semi-structured. Interview questions covered the following ground:

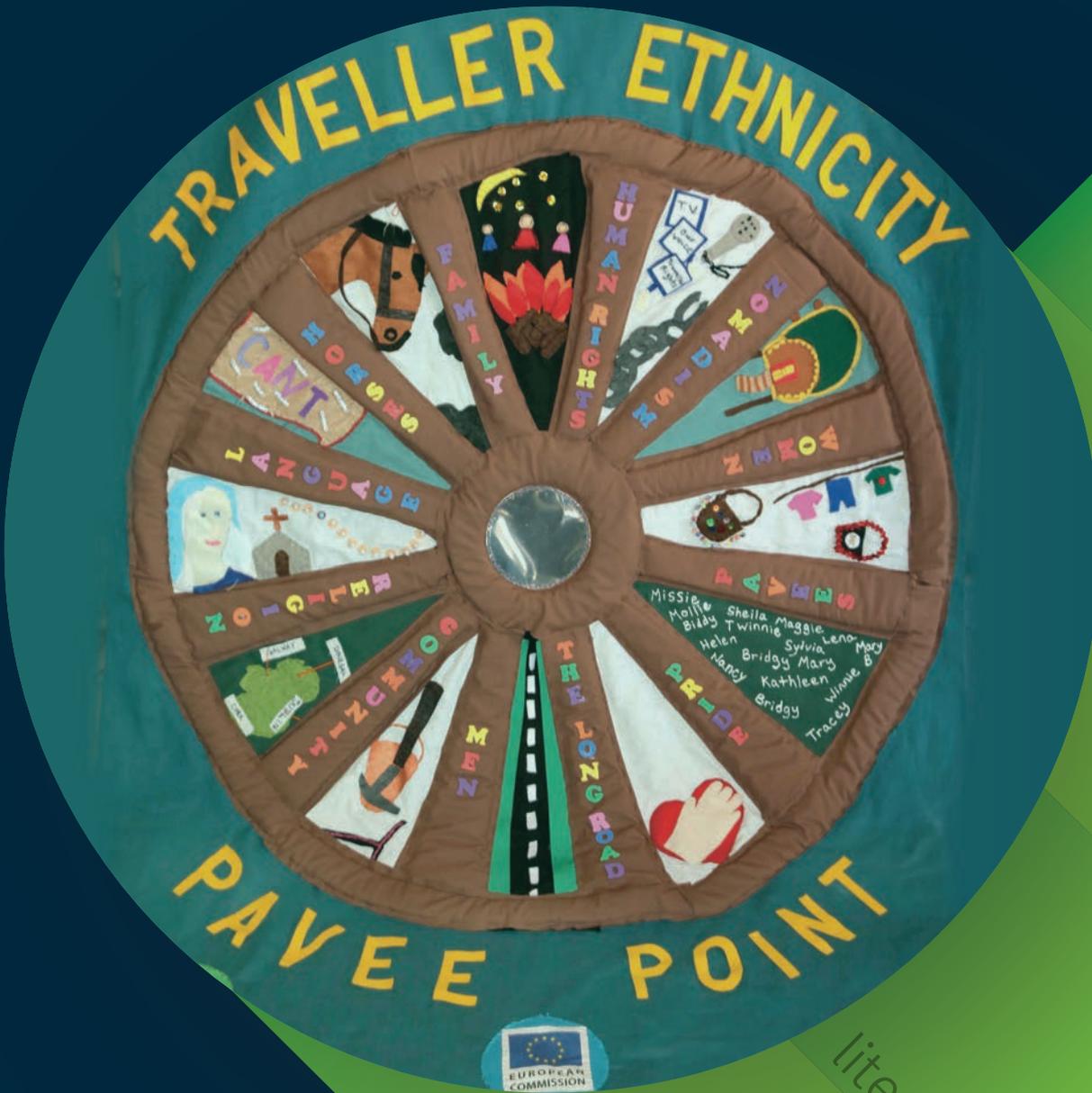
- The effectiveness (strengths and weaknesses) of specific national and local structures for securing policy implementation in the specific policy field, and other drivers identified and their effectiveness.
- The key national and/or local enablers and barriers for effective policy implementation in the specific policy field.
- The effectiveness (strengths and gaps of the National Traveller and Roma Inclusion Strategy as the main national driver for addressing Traveller policy issues across key domains.
- Local level implementers were also asked to comment on: the contribution of the national level to driving implementation at local level (and what might improve this); specific local-level initiatives and their views on the effectiveness of these initiatives; and other local-level initiative they identified that had proved effective in driving policy outcomes and the enablers for this.
- In the fields of health and education, where there is currently an absence of specific policy, national stakeholders were asked to comment on: the current state of play with regard to national strategies; their views on how such policies/strategies should best be designed; and their views on the most effective drivers for implementing such policies.

1.3 REPORT STRUCTURE

Section 2 of this report opens with a review of the literature in regard to policy implementation concerning Traveller-specific policy in general and the enabling and hindering factors that influence the success or failure of such policy implementation. This is followed by an examination of the literature in relation to the evolving conceptualisation of Travellers, by policymakers, as an influential contextual factor. The final part of Section 2 explores the literature on the theory of policy implementation before setting out the conflict-ambiguity model, a frame to examine policy implementation which is applied in this research.

The following three sections set out an analysis of policy implementation in regard to the specific fields of accommodation (Section 3), health (Section 4), and education (Section 5). These sections open with a literature review of the policy field in question, addressing the policy implementation process to date. Drawing from this analysis of available literature and from interviews with key stakeholders conducted for this research, the conflict-ambiguity model is then applied to analyse the policy implementation process in these respective fields. From this analysis, the implications for driving a more effective approach to policy implementation are presented.

Section 6 draws together the analysis from the three policy fields to establish some conclusions for the way forward. It sets out the broad implications of the analysis undertaken for enhancing Traveller policy implementation at local and national level.



literature

Literature Review

2.1 POLICY IMPLEMENTATION: OUTCOMES FOR TRAVELLERS

The unequal outcomes from, and lack of progress in regard to, the implementation of policies addressing the Traveller community, have been well documented over recent decades.³ Persistently high levels of racism, discrimination, and social exclusion, experienced by Travellers, have been established.⁴ This is a situation that points to issues of policy implementation failure. Policy implementation failure can be defined in terms of “the emergence of a significant gap between the planned outputs and outcomes of public policy and what actually occurs.”⁵

Much of the analysis undertaken to date on the situation and experience of the Traveller community has, understandably, focused on the consequences of policy implementation failure, rather than the causes of policy implementation failure. With the exception of the policy area of Traveller accommodation, examined in Section 3, there is a dearth of analysis on the enabling and hindering factors that are influencing Traveller policy implementation failure. There is, however, some available literature that identifies issues of relevance for the policy implementation process regarding Traveller-focused policies.

The 2006 Report of the High Level Group on Issues Affecting the Traveller Community,⁶ examined the outcomes from two interagency pilot projects (led by Clare County Council and South Dublin County Council). While these pilots were concerned with the delivery of integrated services to the Traveller community, rather than the implementation of a specific national policy, the report holds a broader learning on Traveller policy implementation and the failures in this regard.

The 2006 Report recommended that “the solution to the problem of securing better outcomes for Travellers” lay in a focus on implementation at the local level, and recommended a need for “institutionalised inter-agency coordination at national and local level”.⁷

The enabling factors for policy implementation identified in the 2006 Report were: the establishment of a lead group comprising the senior management of the state agencies involved, and whose key role was the removal of delivery barriers; clarity in relation to interagency responsibility; sub-structures comprising middle management and frontline staff of the agencies and Traveller groups; an operational plan identifying the actions required by each agency; meaningful performance indicators to assess progress; meaningful consultation with Traveller organisations; and anti-racism training for all frontline staff.⁸

3 For a synopsis of these issues, across key policy fields, see for example: European Commission, DG Justice and Consumers (2018) (2019) (2020). *Civil Society Monitoring Reports on Implementation of the National Traveller and Roma Integration Strategy in Ireland*. Prepared by Pavee Point Traveller and Roma Centre on behalf of the European Commission, DG Justice and Consumers.

Traveller and Roma Centre on behalf of the European Commission, DG Justice and Consumers. Houses of the Oireachtas (November 2021). Final Report of the Joint Committee on Key Issues Affecting the Traveller Community.

4 For a comprehensive summary of available data and information in this regard, see Watson, D., Kenny, O., and McGinnity, F. (2017) *A Social Portrait of Travellers in Ireland*. Research Series Number 56. Economic Social and Research Council, Dublin.

5 Ansell, C., Sørensen, E., and Torfing, J. (2017). *Improving policy implementation through collaborative policymaking*. *Policy and Politics*, 45(3), 467-486.

6 *Report of the High Level Group on Traveller Issues (2006)*. Established on a short-term basis in 2003, under the aegis of the Cabinet Committee on Social Inclusion and comprising members of the Senior Officials' Group on Social Inclusion and other senior public servants with key responsibility for the delivery of Traveller specific services. Its remit is to ensure that the relevant statutory agencies involved in providing the full range of services to Travellers, would focus on improving the integrated practical delivery of such services.

7 *Ibid.* Pages 4 and 27.

8 *Ibid.* Pages 20-26.

In 2011, Pobal published a review of progress of the Traveller Interagency Groups (TIG) initiative.⁹ This review identified the following key success factors that would be required for the effective operation of Traveller Interagency Groups: involving senior personnel from key agencies; providing mainstreaming mechanisms for promising interagency actions; national validation of the work of TIGs; training for interagency approaches; open communication and equal participation; and Traveller participation and representation.¹⁰

In 2012, the Department of Justice and Equality convened a workshop of the various national committees tasked with driving policy in regard to Traveller health, education, accommodation, and employment. The report from this workshop identifies the views of key stakeholders regarding policy implementation.¹¹ It notes, for example, that, while “There was a generally positive reaction to existing government strategies (targeting the Traveller community)”, there was “great reservation about their implementation and the influence of committees”, with contributors noting “a pressing need for review, evaluation and time-framing of initiatives (and) calls for an independent review of strategy implementation”.¹²

Workshop contributors advised of issues in regard to the efficacy of national committees to drive policy implementation. Key issues noted in this regard were: a lack of communication across the various national committees; the need for the National Traveller Monitoring and Advisory Committee¹³ to adopt more of a national monitoring and driver role regarding the work of the committees; lack of seniority and/or consistency of departmental representatives on a number of committees; insufficient representation of TIG members, given their knowledge of implementation barriers at delivery level; and committee chairs needing to take more of a leadership role.¹⁴

A scoping exercise, undertaken by the Department of Justice and Equality, to inform the mid-way review of the National Traveller and Roma Inclusion Strategy 2017-2021 (NTRIS), offers some useful information regarding this Strategy’s implementation gap.¹⁵ The scoping exercise included a survey of the NTRIS statutory implementing bodies to determine their views on a number of factors that influence implementation. While the majority of implementing bodies advised that the actions they were assigned under NTRIS aligned with the goals and objectives of their department/agency, a number of factors were identified that are likely to have negatively impacted on the implementation of some of the Strategy’s actions. These issues included: a perceived lack of involvement and collaboration in regard to the Strategy’s design (actions being assigned to a government department/agency without prior consultation to determine if their implementation was feasible); some actions not having clear outcomes or not being easy to measure; resource issues regarding Strategy implementation; and unrealistic timeframes regarding delivery on some actions.¹⁶

Issues were also identified, through a further stakeholder survey involving Traveller organisations that are members of the NTRIS Steering Committee, in regard to the oversight of the Strategy’s implementation, through the NTRIS Steering Committee. Key concerns identified were: the Steering Committee was seen as lacking clarity about its role and responsibilities and was not meeting

9 *Traveller Interagency Groups were established around the country from 2006, on foot of the 2006 Report of the High Level Group. Their origins reflect the concern at service provision failure to the Traveller community and the need for Traveller engagement on an equal footing in seeking practical solutions to the issues. Their purpose was to enhance service provision to the Traveller community through support to and coordination of key service providers.*

10 *Department of Justice and Equality (2015). Traveller Interagency Process, the Way Forward: Report of the first TIG conference, May 2015. Page 18.*

11 *McCarthy, O. (2012). Report on the Workshop of National Traveller Committees. Department of Justice and Equality.*

12 *Ibid. Page 2.*

13 *The National Traveller Monitoring and Advisory Committee (NTMAC) was established in 2007 as a forum for dialogue between stakeholders at national level, replacing the Committee to Monitor and Coordinate the Implementation of the Recommendations of the Task Force on the Travelling Community. The advisory, rather than monitoring role of the NTMAC was identified as a retrograde development, by Traveller organisations.*

14 *Ibid. Page 3.*

15 *Department of Justice and Equality (March 2021). Mid Term Review of NTRIS.*

16 *Ibid.*

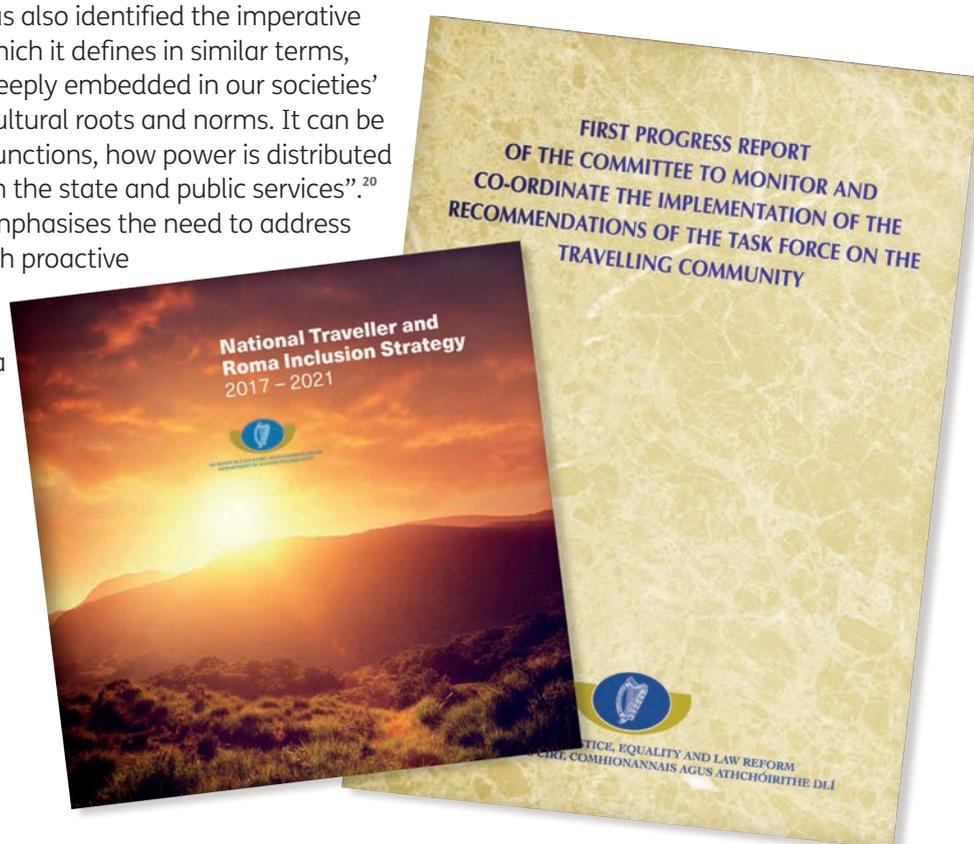
frequently enough, nor given sufficient time to discuss issues; there was a lack of ethnic disaggregated data to measure progress; the ‘traffic light’ framework for tracking progress was inadequate; and there was inadequate reporting on progress.¹⁷

A key issue identified in several reports concerning implementation of policies targeting the Traveller community, is the absence of an ethnic identifier in national and local data systems to inform the design, delivery, and monitoring of policy in order to improve equality outcomes for Travellers. This has been identified across the full spectrum of policy domains.¹⁸

Equality and human rights clearly remain at issue for Travellers and continue to present a core challenge for policy making and policy implementation. In this regard, action to address policy implementation failure must continue to be informed by the goals of achieving equality and fulfilling human rights.

Situations of unequal outcomes for minority ethnic groups are deemed to be an indicator of issues of systemic discrimination/systemic racism, that act to undermine effective policy implementation for minority ethnic groups. The Intercultural Cities Programme of the Council of Europe defines systemic discrimination as occurring “where the procedures, routines and organisational culture of any organisation contribute to unequal outcomes for minority groups compared to the general population”.¹⁹ The Council of Europe emphasises the need for organisations to tackle systemic discrimination by taking action to uncover such discrimination and by putting in place systemic remedies to prevent such discrimination.

The European Commission has also identified the imperative to tackle structural racism, which it defines in similar terms, as follows: “Racism is often deeply embedded in our societies’ history, intertwined with its cultural roots and norms. It can be reflected in the way society functions, how power is distributed and how citizens interact with the state and public services”.²⁰ The European Commission emphasises the need to address such structural racism through proactive approaches, pointing to the need to combat prejudices and stereotyping and for data disaggregated by racial or ethnic origin.



¹⁷ Ibid.

¹⁸ See for example: *First and Second Progress Reports Of the Committee to Monitor and Co-Ordinate the Implementation of the Recommendations of the Task Force on the Travelling Community (2000) and (2005)*. Department of Justice, Equality and Law Reform. And: *Civil Society Monitoring Reports on Implementation of the Roma Integration Strategy in Ireland (2018) (2019) and (2020)*. Op cit.

¹⁹ *Identifying and Preventing Systemic Discrimination at the Local Level: Policy Brief, Intercultural Cities Programme, Council of Europe, 2020*.

²⁰ *A Union of Equality: EU Anti-Racism Action Plan 2020-2025, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions, COM (2020) 565 Final, Brussels, 2020*.

2.2 POLICY IMPLEMENTATION: CONTEXTUAL PARAMETERS

Policies are designed and implemented within broader contextual parameters that influence the extent to which those policies will be successfully implemented, including such as: societal norms and values; socio-economic conditions; and the broader legislative context. These parameters can be highly relevant in any analysis of policy implementation.

The conceptualisation of Travellers, by central government and policymakers, and the changing nature of this conceptualisation, is a central contextual parameter in this regard. Change in this conceptualisation can be charted from the earliest policy focus on the Traveller community, in the Report of the Commission on Itinerancy (1963), to the current national policy focus, the National Traveller and Roma Inclusion Strategy (2017-2021) (see Figure 1).

FIGURE 1

Report of the Commission on Itinerancy (1963): Policy approach of Assimilation

- explicit refutation of Travellers having a distinct ethnicity;
- significant problematizing of Travellers, noting the “problems inherent in their way of life” and referring throughout to the “itinerant’ problem”;
- policy focus on “absorption” of Travellers into the general population, with a focus on criminalizing nomadic practices.

Report of the Travelling People Review Body (1983): Policy approach of Integration

- assimilationist approach viewed as “unacceptable”, favouring ‘integration’ of Travellers with the settled community;
- explicit statement that Travellers are not a distinct ethnic group, viewing their ethnic and cultural identity as a matter of individual choice;
- failure to address the systemic issues in regard to Travellers adverse situation and experience in society.

Report of the Task Force on the Travelling Community (1995): Policy approach of Acknowledgement of Culture and Identity

- action addressing discrimination and inequalities experienced by Travellers in key domains is emphasised;
- acknowledgement of the distinct culture and identity of Travellers and the need to take this distinct culture and identity into account, in particular in relation to provision of: accommodation, education, and employment.

National Traveller and Roma Inclusion Strategy (2017-2021): Policy approach of Inclusion

- cultural identity established as one of ten strategic themes;
- change in emphasis from ‘integration’ to ‘inclusion’;
- anti-discrimination and equality as another strategic theme; and
- focus on a “collaborative and participative” approach between the state and the Traveller community, in decisions affecting the lives of Travellers.

The launch of the National Traveller and Roma Strategy was immediately followed by formal recognition of Travellers as a distinct ethnic group, in 2017.

These shifts in the policy conceptualisation of Travellers are a source of potential challenge in that, the consensus and shared understanding they might enjoy across different fields and levels of governance has not been established. The failure to adequately understand and respond to the implications of Traveller culture and identity will likely lead to a policy design and policy implementation context that has negative implications for policy outcomes.

In the case of Traveller accommodation, for example, while conceptualisation of Traveller culture and identity in policymaking has positively evolved from one of assimilation to one of recognition of ethnic difference, and the specific accommodation needs that result, this conceptualisation is not necessarily informing, shaping or influencing policy implementation at local level. Contested views in regard to the ethnic status of the Traveller community, where, for example, accommodation preferences are perceived as related more to lifestyle choice than cultural difference, have a direct bearing on local policy implementation.²¹

2.3 POLICY IMPLEMENTATION: THEORETICAL APPROACHES

Defining Policy Success and Failure

An extensive body of literature, spanning several decades, has attempted to identify the enabling and hindering factors that influence the success or failure of policy implementation. The literature increasingly emphasises that the policymaking system, from conception and design through to implementation, is complex, non-linear, and often chaotic and unpredictable.²²

The value in defining what constitutes ‘successful’ policy implementation is identified in the literature, however, what constitutes policy failure or success is contested. In addition, it is typically the case that specific policies will neither be outright failures nor outright successes, therefore, defining failure or success will depend on the varying viewpoints of stakeholders.²³

Matland (1995) argues that the central question in regard to defining policy failure or success revolves around whether to focus on “fidelity to the designer’s plan or on the general consequences of implementation actions” in determining policy implementation success.²⁴ Matland concludes that “when policy goals have been explicitly stated, then, based on democratic theory, the statutory designers’ values have a superior value. In such instances the correct standard of implementation success is loyalty to the prescribed goals. When a policy does not have explicitly stated goals, the choice of a standard becomes more difficult, and more general societal norms and values come into play.”²⁵

For the purposes of this research, as noted above, the following definition of policy implementation failure is suggested: “the emergence of a significant gap between the planned outputs and outcomes of public policy and what actually occurs.”²⁶

21 Coates, D. et al. (2008). *Traveller Accommodation in Ireland: Review of Policy and Practice*. Housing Policy Discussion Series 3. Centre for Housing Research, Dublin.

22 Hudson, B., Hunter, D., and Peckham, S. (2018). *Policy Failure and the Policy-implementation Gap: Can Policy Support Programs Help? Policy Design and Practice*. Vol 2, 2019, issue 1.

23 McConnell, A. (2015). *What is Policy Failure? A primer to help navigate the maze*. *Public Policy and Administration*. 2015. 30(3-4):221-242.

24 Matland, R. E. (1995). *Synthesizing the Implementation Literature: The Ambiguity-Conflict Model of Policy Implementation*. *Journal of Public Administration Research and Theory*. J-PART, 5(1995):2:145-174. Page 154

25 *Ibid.* Page 155.

26 Ansell, C., Sørensen, E., and Torfing, J. (2017). *Op cit.*

Top-Down and Bottom-Up Approaches to Policy Analysis

Two schools of thought initially developed regarding policy implementation and how it can most usefully be examined and explained: the top-down approach, and the bottom-up approach.²⁷ Top-down approach theorists stress the central role of policymakers and the macro-level as the central element in the implementation process. Their emphasis is on a more bureaucratic form of policymaking with clear policy goals to direct local implementers.

Bottom-up theorists on the other hand, emphasise the importance of local level policy implementers, arguing that implementation problems are most likely to occur from the interaction between the macro-level plan and the micro-level actors tasked with its delivery. Bottom-up theorists argue that scrutiny must be at the micro-level in order to understand implementation issues.

Top-down and bottom-up theorists focus attention on different factors that contribute to policy implementation failure.²⁸ The top-down explanation identifies fault lines in regard to the implementation chain from the macro, design-level down to the points of implementation at local level. Along this top-down implementation chain, a number of veto points usually exist between policymakers and local delivery agencies. At each of these veto points, it is observed, “imprecise goals, political conflicts, competing obligations, the complexity of joint action, or the lack of resources, skills and commitment can cause deviations that significantly lower the chance of successful implementation and enhance the risk of failure. The longer the implementation chains are, the higher the risk of failure.”²⁹

Bottom-up theorists, on the other hand, focus on the importance of the micro, delivery level, arguing that the failure of macro-level players to fully appreciate the significance of the delivery end of the implementation chain is a key factor in policy implementation failure. At the policy delivery level, for example, local implementors may have a high level of discretion in regard to how the policy is delivered through their direct contact with policy target stakeholders. Factors such as: competing demands and conflicts; personal and professional norms; and limited time and financial resources, all contribute to such discretionary practices at the delivery level.

Evolving theory in the field of policy implementation stresses the need for a more integrated focus on both top-down and bottom-up factors, and in addition, on outside-in factors that also impact on the policy implementation process. Outside-in causal factors that contribute to policy implementation failure include: external stakeholders and target groups obstructing implementation to defend their own interests; and stakeholders “refusing to comply with particular rules and regulations, playing games with the system, or acting in a non-cooperative and disengaged manner in relation to regulators and service providers”.³⁰

Contributors to Policy Implementation Failure

In their synthesis of the literature on policy implementation failure, Hudson et. al. (2018) identify four main contributors to implementation failure: overly optimistic expectations; implementation in dispersed governance; inadequate collaborative policymaking; and the unpredictability of the political cycle.³¹

Overly optimistic expectations relate to policymakers underestimating the complexity and challenges of implementation, including: the costs, timescales and risks involved; and the likely difficulties in aligning the different views of stakeholders.

The key implementation issues in relation to dispersed governance that arise involve: macro-level

27 Matland, R. E. (1995). *Op cit.*

28 Ansell, C. et al. (2017). *Op cit.*

29 *Ibid.* Page 473.

30 *Ibid.* Page 474.

31 Hudson, B. et al. (2018). *Op cit.*

policy developers having insufficient knowledge of the reality of the coalface where the policy is to be implemented; and local implementers lacking the autonomy to make decisions to comply with the policy, or conversely, having considerable scope to shape how the policy is implemented.

The lack of a collaborative approach to policymaking, in particular at the design stage, is identified as a factor driving implementation failure. Ansell et. al (2017) draw attention to policymaking as a political as much as an administrative process, noting that “policy designs tend to suffer from the failure to properly deal with the substantive and inherently political issues involved in policymaking.”³² This, they argue, requires a collaborative process, one that “connects actors vertically and horizontally in a process of collaboration and joint deliberation” towards a “search for sufficient common ground to proceed”.³³ The authors suggest that inadequate attention to collaborative policymaking can result in: one-sided or simplistic understandings of the problem to be addressed; a policy that is insufficiently flexible and innovative to “break the obstructive trade-offs between different goals, and constraints associated with wicked and unruly problems”; and a lack of stakeholder buy-in.

Key issues in relation to the impact of the political cycle on policy implementation that arise are: elected representatives seeking short-term wins over the longer more complex reality of policy implementation; and a lack of political backing to develop and drive specific policies.

Further specific factors identified in the literature as contributing to policy implementation failure include: a lack of transparency, by policymakers, in regard to the rationale for the policy direction proposed; a lack of quality data to inform policy design and to track and monitor implementation; interested parties seeking to boost their own interests; an absence of, or an inadequate ‘delivery unit’ for the policy; a lack of specific problem-solving expertise and support to remove or mitigate local-level implementation barriers; and hostility or direct resistance to the policy from local-level implementers and/or other interested parties.

2.4 THE AMBIGUITY-CONFLICT MODEL

Matland’s (1995) ambiguity-conflict model provides a frame to examine policy implementation. The model seeks to both synthesize top-down and bottom-up approaches, while also moving beyond listing specific variables that prevent or enable implementation, to examining the conditions within which these variables become important or irrelevant.³⁴ Matland posits that, studying the degree of ambiguity and conflict associated with a particular policy can allow for testable predictions to be made in regard to how the implementation process is likely to unfold.

Policy conflict can arise in regard to the proposed goals and objectives of a policy and in regard to the means through which the policy is proposed to be implemented. Policy ‘conflict’ can, but does not necessarily, refer to conflict as we commonly understand the term: overt opposition or disputes or clashing interests. A policy might have broad support but still be high conflict if, for example, the policy objectives set are incompatible with one other or, for example, there is not agreement in regard to how the policy is framed or in regard to the most effective means of implementation.

Policymaking is not value-free, and specific values, implicit and explicit, will shape the framing of policy problems and the selection of supporting evidence.³⁵ Policy conflict can, therefore, encompass a values incompatibility or incongruous views across the interested parties. Conflict will also be inevitable in instances where the policy focus is attended by controversy.

32 *Ibid.* Page 12.

33 Ansell, C. et al (2017). *Op cit.* Page 474.

34 Matland, R. E. (1995). *Op cit.*

35 Scharfbillig, M., Smillie, L., Mair, D., Sienkiewicz, M., Keimer, J., Pinho Dos Santos, T., Vinagreiri Alves, H., Veccihone, E., Scheunemann, L. (2021). *Values and Identities: A Policymakers Guide.* EUR 30800, publication Office of the European Union, Luxembourg.

Policy ambiguity can arise in regard to the proposed goals and objectives of a policy and in regard to the means of policy implementation. Ambiguity is about levels of clarity. It can reflect conscious strategy to manage policy conflict, or it can reflect a limited understanding of an issue in terms of policy goals and objectives or uncertainty about the organisational roles or the tools to be deployed in terms of the means of policy implementation.

Proponents of top-down approaches to policy implementation argue, that, for policy implementation to go smoothly, there needs to be clarity regarding policy goals and objectives (low ambiguity). Counter arguments, however, note that low ambiguity in regard to policy goals does not equate to low conflict when it comes to policy implementation. It may be the case, for example, that where there is clarity regarding a policy’s goals and objectives (low policy ambiguity) this can have the effect of increasing conflict, as interested parties are clearer about what is at stake and where the risks and benefits are to their own and others interests.³⁶ In this regard, policymakers, in an effort to stave off likely policy conflict, might opt to design a policy that is more ambiguous in its proposed goals and objectives.

While top-down approaches to policy implementation strive to eliminate ambiguity, this is not always possible, for example, if there is a lack of understanding regarding the nature of the problem to be addressed or the manner in which it is to be addressed.

The ambiguity-conflict model matrix is presented in Figure 2. The model identifies four paradigms, each representing a distinct type of implementation process likely to unfold, depending on the level of conflict/ambiguity associated with the specific policy: administrative implementation; political implementation; experimental implementation; and symbolic implementation. For each implementation process type, there is an associated driver that is central to determining outcomes for this type of policy implementation process.



36 Matland, R, E. (1995). Op cit. Page 158.

Low policy ambiguity and low policy conflict: in this scenario, policy goals and objectives are supported among stakeholders and there is agreement in regard to the means of implementation (low conflict). In addition, policy goals and objectives are clear and coherent and there is a high level of clarity in regard to the means of implementation (low ambiguity), with each actor in the implementation chain understanding their roles and responsibilities and having the capacity and authority to implement the policy. The implementation process in such a scenario is purely administrative in nature: a top-down approach can easily drive implementation, and the system is relatively closed off from external influence.

In this scenario, resources are the determining outcomes driver. Policy implementation is almost guaranteed, as long as sufficient resources are available for implementation. Any problems that arise tend to be of a technical nature.

Low policy ambiguity and high policy conflict: in this scenario, policy goals and objectives and/or means are clear and coherent (low ambiguity), however, there is not uniform agreement about, or support for policy goals and/or in regard to how implementation is to be achieved (high conflict). The implementation process likely to unfold in such a scenario is ‘political’, in nature in that it will exhibit the “bargaining and other activities associated with the bureaucratic politics tradition of decision-making.”³⁷

In this scenario, power is the determining outcomes driver, in that, those stakeholders with the necessary power to drive implementation, either through coercive or bargaining means, will be key. In regard to coercive power, Matland notes that “Coercive mechanisms are most effective when the desired outcomes are easily monitored and the coercing principal controls a resource essential to the (implementing) agent”.³⁸ In regard to bargaining power, he notes that bargaining power or remunerative mechanisms become more central where the implementing agent has greater autonomy and its own power base.

High policy ambiguity and low policy conflict: in this scenario, policy goals and objectives and/or the means of implementation are unclear (high ambiguity), however, there is support for the policy (low conflict). In a scenario where policy goals and/or means are unclear, implementation success will depend on the engagement of key local-level implementation actors. In addition, local level implementation is open to a more ‘experimental’ process, as local actors make their own decisions about how to interpret policy goals and/or means. In such a scenario, implementation quality and success will vary across local implementation sites and the contextual conditions (resources and key actors) at local level are the determining outcomes driver. The lack of conflict opens the arena for a large number of actors to work cooperatively towards implementation.

High policy ambiguity and high policy conflict: in this scenario, both policy ambiguity and policy conflict are high. As noted earlier, high policy ambiguity tends to result in lower levels of policy conflict, since there is sufficient goal vagueness to reduce conflict among interested parties. Nonetheless, situations of high policy ambiguity and high conflict can arise. For example, where a policy has a very unclear goal, high levels of conflict may arise in regard to the differing interpretations of this goal and how it should be implemented. This is even more so, where stakeholders have a vested interest in interpreting the policy goal in a particular way.

Policies that invoke, what Matland refers to as “highly salient symbols” often produce high degrees of conflict. ‘Symbolic policies’ the author notes, “play an important role in confirming new goals, in reaffirming a commitment to old goals, or in emphasizing important values and principles”.³⁹

37 *Ibid.* Page 163.

38 *Ibid.* Page 164.

39 *Ibid.* Page 168.

Matland notes that policies aimed at redistribution of power and resources often fall into this category, as, where they are vague in regard to goals and implementation, the associated symbols are likely to cause conflict, for fear of what the policy might imply for the existing order. He further notes that, while traditionally symbolic politics has been associated with non-implementation of policy, a “considerably richer understanding of the effects of symbols on politics can be produced if policies are defined as symbolic before they have been implemented”.⁴⁰

In this scenario where both policy conflict and ambiguity are high, the coalitional strength of actors at the delivery level is the determining outcomes driver. The local implementation level becomes key in this policy scenario due to the combination of both high conflict and high ambiguity. Outcomes from policy implementation can, therefore, vary across implementation sites. External influences are at play at the local level, in particular, in determining coalitional strength, and professionals can have an important role with professional norms determining legitimate actions and effective problem-solving.

APPLYING MATLAND’S MODEL

Matland’s conflict-ambiguity model is a comprehensive approach to analysing policy implementation as it goes beyond an examination of the list of top-down and bottom-up variables cited as impeding policy implementation, to a more comprehensive examination of the top-down, bottom-up, and outside-in conditions that affect the significance of these variables and the conditions in which certain variables are more or less relevant. Such contextual parameters are of particular relevance in regard to policies targeting the Traveller community.

In seeking to analyse the conditions that have been and could be favourable to the implementation of Traveller-specific policies, this research will apply Matland’s model as a lens in analysing the current situation regarding policy implementation and in establishing the future implications suggested by this analysis.

40 Ibid. Page 168.

“

...a key issue identified in several reports concerning implementation of policies targeting the Traveller community, is the absence of an ethnic identifier in national and local data systems to inform the design, delivery, and monitoring of policy...

”

03



accommodation

Policy Implementation: Traveller Accommodation

3.1 LITERATURE REVIEW

The Housing (Traveller Accommodation) Act 1998 provides the legislative and policy framework setting out the statutory responsibilities of local authorities and the national and local oversight infrastructure, for the provision of accommodation and related supports to the Traveller community.

This policy field has been extensively reviewed and analysed, in regard to policy implementation issues.⁴¹ This report does not intend to rehearse the detail contained in these reports. There is, however, agreement across these various analyses and reviews, that a considerable implementation deficit exists regarding this policy framework.

A summary of the factors identified as negatively affecting policy implementation of this policy framework, in these various reviews and analyses, is provided in Figure 3.

FIGURE 3

eReviews of the Housing (Traveller Accommodation) Act 1998: Variables identified as negatively impacting on policy implementation:

- Planning systems issues, specifically:
 - At national level: inadequate connection between the national framework (the 1998 Act) and planning legislation; a lack of adequate planning guidance for planning authorities concerning Traveller accommodation; and an absence of monitoring and reviewing of Development Plans and how they relate to Traveller accommodation;
 - At local level: the operation of the 'Part 8' planning mechanism, used to deliver local authority social housing, which requires the approval of local councillors and which is routinely refused; the infrequent use, by local authority CEOs, of their executive power to dispense of Part 8 requirements; councillors refusal of approval for the disposal and acquisition of land by local authorities; a lack of integration between the Traveller Accommodation Programmes and the Housing Strategy/ Development plans;
- Capacity and resource issues, specifically:
 - funding adequacy for Traveller-specific accommodation and related supports;
 - lack of funding drawdown by local authorities;
 - inadequate design and/or maintenance of Traveller-specific sites;
 - limited involvement of approved housing bodies, in the provision of Traveller-specific accommodation;

41 National Traveller Accommodation Consultative Committee (2004). *Review of the Operation of the Housing (Traveller Accommodation) Act 1998. Report to the Minister for Housing and Urban Renewal.*

Norris, M. and Winston, N. (2005) *Housing and Accommodation of Irish Travellers: From Assimilationism to Multiculturalism and Back Again. Social Policy and Administration. Vol. 9. No. 7. PP 802-821.*

Coates, D. et al. (2008). *Traveller Accommodation in Ireland: Review of Policy and Practice. Housing Policy Discussion Series 3. Centre for Housing Research, Dublin.*

RSM PACE Ltd. (2017). *Review of Funding for Traveller-Specific Accommodation and the Implementation of Traveller Accommodation Programmes. 31. Housing Agency, 53-54 Mount Street Upper, Dublin 2.*

Report of the Independent Expert Review Group on Traveller Accommodation (July 2019). Prepared on behalf of the Minister for Housing, Planning and Local Government.

- Racist attitudes among local population, resulting in objections to progression of local Traveller-specific accommodation;
- An absence of robust data to ensure evidence-based planning, monitoring and delivery;
- Availability and cost of public land for Traveller-specific developments;
- Inadequate accommodation needs assessment processes by local authorities, in particular: lack of accuracy in determining current and projected accommodation need; and inadequate consultation with local Travellers on needs and preferences;
- Limited motivation for local authorities to deliver on accommodation outputs and an absence of penalties for under-performance in delivery;
- Inadequate staffing resources in the Department of Housing and Local Government Traveller Accommodation Unit, to oversee and drive policy implementation;
- Limited powers and resources available to the national oversight structure, the National Traveller Accommodation Consultative Committees, to drive implementation;
- Limited powers available to the local oversight structure, the Local Traveller Accommodation Consultative Committees, to drive local implementation; and
- Tensions and diverging opinions in regard to the accommodation needs of Travellers arising from their ethnicity, which shape the delivery options pursued at local level.

It is important to look beyond this list of variables to the wider contextual issues, in particular, to examine issues of policy conflict and policy ambiguity. This is not to suggest that these implementation variables are not significant factors in the policy implementation process. However, going beyond a focus on these individual variables in attempting to analyse policy implementation more comprehensively, we apply Matland's ambiguity-conflict model.

3.2 TRAVELLER ACCOMMODATION POLICY: APPLYING THE AMBIGUITY-CONFLICT MODEL

In this section we apply Matland's ambiguity-conflict model to the field of national Traveller policy in relation to accommodation. We first establish the level of policy conflict and policy ambiguity associated with the implementation of Traveller accommodation policy (summed up in Figure 4.). We then identify the implications of this analysis in regard to the policy implementation process. In conclusion, we set out considerations for a more effective implementation of Traveller accommodation policy.

Policy Conflict

On the low-to-high policy conflict continuum, Traveller accommodation policy is one of high conflict. The review of the literature, and the interviews with stakeholders, present evidence of three areas of conflict, relating to policy goals and to policy means:

- policy goals regarding the need to provide culturally appropriate accommodation;
- development of a dual approach to policymaking and implementation, that would interlink mainstreaming and targeting initiatives; and
- the means to implement the policy, in terms of national drivers.

Each of these three areas is briefly examined below.

Policy goals for culturally appropriate accommodation provision:

The provision of culturally appropriate, Traveller-specific accommodation is a contested issue.⁴² Despite the progressive evolution, in policy focus and the policy conceptualisation of Travellers, from assimilation towards inclusion and recognition of Traveller ethnicity, the ripples of the assimilation policy focus are still evident.

The parliamentary debates during the Housing (Traveller Accommodation) Bill's passage through the houses of the Oireachtas, are illustrative of the controversial nature of this issue. The contributions of some elected representatives called into question the notion of a distinct Traveller ethnicity, with some suggesting Traveller preferences were about lifestyle choice: "I have had serious differences of opinion with members of the Traveller community. I do not, for example, accept the concept of a Traveller culture."; and "There must be give and take. If people want to maintain a certain lifestyle, they must accept that it is not one that finds favour with a great many people within society".⁴³

The debates referenced the anticipated opposition that would unfold at the local authority delivery level: "I have friends who work for local authorities and if I mention the Travellers they roll their eyes and inform me that (they) have no obligation to provide them with housing"; and "I have heard representatives of local authorities claiming to have done as much as could be expected of them and passing the responsibility to neighbouring counties".⁴⁴

This commentary reveals something of the level of antipathy from legislators in regard to this policy issue and to culturally appropriate policy responses. The level of contention in regard to Traveller ethnicity and its consequent requirement for culturally appropriate accommodation, suggests a high degree of policy conflict regarding the core of the 1998 Act: its underlying values and norms. Matland advises that, when a policy is contested at the level of perceived incompatibility of values, it is much more difficult to avoid or adjust the level of policy conflict.⁴⁵

The contested nature of Traveller accommodation policy is also in evidence at the local delivery level. The Irish Human Rights and Equality Commission, in its analysis of the local authority equality reviews of their Traveller Accommodation Programmes, found that, across the majority of local authorities there was a lack of appreciation for the distinct cultural needs of Travellers in the provision of local authority accommodation and related supports to Travellers. There was also a problematic framing of cultural diversity among some local authorities identified, in particular, regarding the issue of horse ownership, and regarding the provision of transient accommodation to accommodate nomadic tradition.⁴⁶

⁴² Norris, M., and Winston, N. (2005). *Op cit.*

⁴³ Seanad Éireann debate, Wednesday April 29, 1998. *Housing (Traveller Accommodation) Bill 1998, second stage.*

⁴⁴ *Ibid.*

⁴⁵ Matland, R, E. (1995). *Op cit.* Page 157

⁴⁶ Irish Human Rights and Equality Commission 14/07/2021 press release: *Accounts of first Council by Council Equality Review on Traveller Accommodation in History of State Published.* Website last accessed April 10, 2022.

In 2017, by way of example, local media in Galway reported that “a number of” city councillors were opposed to the building of Traveller halting sites, with one elected representative describing Traveller halting sites as “a failed entity”, and another noting that “a high percentage of the Traveller community do not want more halting sites”.⁴⁷

Further evidence in this regard is provided by the investigation of the Ombudsman for Children Office, into the living conditions for children on an unnamed Traveller halting site.⁴⁸ The investigation found a local authority failure to comply with and implement the minimum requirements of the Traveller Accommodation Programme (TAP) and, further, that this failure to comply with the minimum requirements of the law is contrary to fair and sound administration and is improperly discriminatory.⁴⁹ The Ombudsman pointed to inadequate investment in the staffing of the responsible departmental Traveller Accommodation Unit, recommending a review of the purpose, function and operation of the Unit, focusing on capacity, resources and staff, to ensure it is adequately resourced to carry out its functions.⁵⁰ Further investigations on other Traveller halting sites are in train.

Interviewees for this research raised similar issues indicative of policy conflict in this regard, including: the limited level of resources provided for units responsible for Traveller accommodation at national and local level; instances of local elected representatives using their membership of the Local Traveller Accommodation Consultative Committee (LTACC) to block rather than progress Traveller-specific accommodation developments; and the prevalence of a perception that Travellers can have unrealistic expectations, including where provision sought for activities of cultural importance, such as horse ownership, is deemed to be an unrealistic expectation.

One could argue that this conflict is reflected in the year-on-year increase in the number of Travellers being accommodated in standard housing, coupled with the decrease in the provision of, and the numbers of Travellers being accommodated in halting sites and group housing schemes.

Targeting versus mainstreaming: Policy conflict is evident in an effective segregation of Traveller accommodation issues from mainstream housing policy. This centres on the emphasis for policymaking and policy implementation, in this field, being focused on targeting rather than mainstreaming, with little evidence of a dual and interlinked approach involving both targeting and mainstreaming.

This is particularly apparent in the response to Traveller homelessness. The ‘Housing for All: A New Housing Plan for Ireland’, published in 2021, references Traveller-specific accommodation, under the social inclusion element of the ‘Pathway to Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion’.⁵¹ This includes commitments, of a targeted and culturally appropriate nature, to work with local authorities and approved housing bodies to improve the quality and quantity of delivery of Traveller-specific accommodation, to prioritise implementation of the Expert Review Group recommendations, and to engage with the Northern Ireland Housing Executive on the feasibility of an all-island approach to the provision of a network of transient sites.

The 2021 Plan recognises representation of Travellers among the homeless population, under the ‘eradicate homelessness’ element of that pathway, but it does not address this in any detail, beyond reference to the National Traveller and Roma Inclusion Strategy.⁵² Interviewees for this research noted the absence of a focus on the specificity of the Traveller experience in regard to homelessness, in particular in the context of high levels of racism experienced by Travellers in accessing private rented accommodation.

47 – Dara Bradley “City’s halting sites are a “failed entity” according to councillors”. *Connacht Tribune*, February 27, 2017.

48 – Ombudsman for Children Office (May 2021), *No End in Site: An investigation into the living conditions of children living on a local authority halting site*.

49 – *Ibid.* Page 60.

50 – *Ibid.* Page 65.

51 – *Housing for All: A New Housing Plan for Ireland*. Government of Ireland, 2021. Pages 69-70.

52 – *Ibid.* Page 53.

Interviewees further noted the limited connections made between the Housing for All Plan and Traveller accommodation policy, both in the Plan itself and in its implementation structures and processes. The Housing for All infrastructure, it was observed, is well resourced, attended by all of the key stakeholders, and held to account on targets by the national drivers, unlike in relation to Traveller accommodation policy.

Harvey, in his study of Traveller homelessness, identifies a “two worlds’ problem in which homelessness on the one hand and Travellers (and Roma) on the other are seen conceptually, statistically and administratively as two different worlds, each with its own systems and institutional architecture”.⁵³ He concludes that a “weak, divided institutional architecture with poor communication flow has serious practical consequences”.⁵⁴

The absence of a mainstreaming approach in the Traveller accommodation policy field was further evidenced by the Irish Human Rights and Equality Commission, in its analysis of the local authority equality reviews of their Traveller Accommodation Programmes. The Commission found that, across the majority of local authorities, there was an absence of initiative to establish and respond to the implications of cultural difference in the provision and management of standard housing and in intercultural community building around such provision. Interviewees for this research reinforced such issues, including noting: a fear of difference, and pressure on Travellers to “live like the rest of us”, evident in local level commentary; and local communities being stuck in a viewpoint of Travellers that is both negative and stereotypical with community conflict alongside a lack of investment in intercultural community building.

National drivers for policy implementation:

The Task Force on the Travelling Community (1995) recommended the establishment of a Traveller Accommodation Agency to drive local implementation of the Traveller Accommodation Programmes: something which national Traveller organisations continue to call for. This recommendation was not, however, implemented by government, and instead a unit within the Department of the Environment and Local Government was tasked with overseeing the Programme.⁵⁵

Norris and Winston (2005) observe a contradiction between, on the one hand, “the willingness of central government to adopt relatively radical multicultural objectives for Traveller accommodation policy (compared to policy on other minority ethnic groups)”, and on the other hand, the continued reluctance of central government to relieve local authorities of their responsibilities and instead to centralise the drivers for implementation of Traveller accommodation policy. This contradiction, they argue, “may be explained by its (central government) lack of responsibility for policy implementation”.⁵⁶

The 2019 Report of the Expert Review Group recommended the establishment of a ‘National Traveller Accommodation Authority’ to drive implementation of the Traveller Accommodation Programmes.⁵⁷ This recommendation has not been implemented to date and remains a contested issue among the stakeholders.⁵⁸

53 Harvey B. (2021). *The Traveller Community and Homelessness*. Pavee Point Traveller and Roma Centre. Page 45.

54 *Ibid*, Page 45.

55 *The rationale given at the time, by government, was that such an agency would “introduce a new layer of administration which would be expensive, and run contrary to the policy to devolve powers to local authorities” and that a national agency “would have no power to provide accommodation in circumstances where the local authority failed to do so” First Progress Report Of the Committee to Monitor and Co-Ordinate the Implementation of the Recommendations of the Task Force on the Travelling Community (2000). Department of Justice, Equality and Law Reform. Page 43.*

56 Norris, M., and Winston, N. (2005). *Op cit*. Page 818.

57 *Report of the Independent Expert Review Group on Traveller Accommodation (July 2019). Op cit.*

58 Norris, M., and Winston, N., *Op cit*.

Interviewees for this research had conflicting views on the need for and potential efficacy of such a national agency. A number of interviewees emphasised the need for such an agency, but others advised that such an agency would have no real power to address implementation failure at local level.

This conflict centering on the most relevant drivers for policy implementation is further reflected in relation to conflicting perspectives on the National Traveller Accommodation Consultative Committee (NTACC) and the LTACCs. Interviewees noted challenges in relation to: the powers and role of the LTACC, its insertion within local authority structures, the seniority and responsibilities of local authority personnel involved, and the resources available to it; and in relation to the monitoring powers available to the NTACC, its linkages with the local level, and the seniority and attendance of members from some of the statutory elements.

The Expert Review Report recommended that LTACCs should be reconfigured as Traveller Accommodation Strategic Policy Committees (TASPCs), to align them more closely with the functioning of local authority Strategic Policy Committees (SPCs). The Expert Review Report recommended that these TASPCs should be given decision-making powers to move them beyond the realm of advisory spaces, and that they would “feed into the development of housing strategy by being integrated into the Housing SPC. The two SPCs would be linked through a Traveller representative on the TASPC sitting on the Housing SPC.”⁵⁹

Policy Ambiguity

On the low-to-high policy ambiguity continuum, Traveller accommodation policy is one of high ambiguity. The policy framework itself (the 1998 Act) is one of low ambiguity, in that it is detailed and clear in regard to: policy goals and objectives; the requirements of policy implementers; and the remit and role of national and local-level structures to support and oversee implementation. There is, however, an observable shift, from low to high policy ambiguity, in moving from the national level to the local delivery level of the policy implementation chain.

At the local delivery level, policy ambiguity arises in regard to policy goals, which, in turn, has implications for ambiguity of means. The two areas of ambiguity, identified from the literature review and the interviews with stakeholders, in this regard are:

- the contention that the policy goals are no longer appropriately construed in their relevance to Traveller needs; and
- an apparent lack of understanding of, or attention to, the practical implications of cultural difference, by local authorities, which gives rise to uncertainties and differing views about how best to implement policy objectives at the local level.

Each of these two areas is briefly examined below.

Ambiguity in regard to how Traveller accommodation policy goals are construed:

This area of ambiguity is evident from an examination of the Irish Human Rights and Equality Commission’s reports on the city and county councils’ equality reviews of their Traveller Accommodation Programmes.⁶⁰ These reports indicate that, the majority of local authorities contend that Travellers in their administrative areas are increasingly expressing a preference for standard housing rather than Traveller-specific accommodation. The Irish Human Rights and Equality Commission concluded that Travellers’ true accommodation preference (i.e. with regard to Traveller-specific accommodation or social housing) is not adequately rendered transparent, nor does it appear to have been independently verified over time.

59 Report of the Independent Expert Review Group on Traveller Accommodation (July 2019). *Op cit.* Page xiii.

60 The Irish Human Rights and Equality Commission (2019). *Op cit.*

This issue was raised by interviewees for this research, with diverging views evident, in particular between Traveller organisations on the one hand and statutory organisation interviewees on the other. Specifically, the process for, and quality of engagement by local authorities in the identification of needs and preferences was questioned; and delays in provision of Traveller-specific accommodation was noted as raising issues of ‘true’ preferences, outside of preferences rooted in the pressure of non-delivery. On the other hand, it was suggested that Traveller preferences were shifting, in particular from one generation to the next. In this, interviewees reflected the findings in reports of the Irish Human Rights and Equality Commission noted above.

Whether or not such changing preferences are in fact true preferences or a response to the persistent failure by many local authorities to build and adequately maintain Traveller-specific accommodation, this is a source of a high degree of policy ambiguity in regard to how Traveller Accommodation Programmes should be conceived and implemented.

Ambiguity in regard to the practical implications of cultural difference: This area of ambiguity is also evident from an examination of the Irish Human Rights and Equality Commission’s analysis of the local authority equality reviews of their Traveller Accommodation Programmes. A key issue noted by the Commission was the lack of evidence of an adequate appreciation, among city and county councils, of the practical implications of cultural difference, when providing services and engaging with the Traveller community. In particular this arose in regard to:

- design and management of Traveller-specific accommodation;
- provision for Traveller nomadism and other tangible manifestations of Traveller culture such as horse ownership;
- responding to homelessness in the Traveller community; and
- providing for and supporting Travellers living in standard housing.⁶¹

This issue regarding perspectives on, and understandings of cultural diversity and resultant ambiguity at both local and national level, was raised by interviewees for this research, most specifically as being evident in: conflicting and/or unclear understandings regarding what does or does not constitute culturally appropriate accommodation; an absence of up-to-date guidance, for local authorities, regarding what constitutes culturally appropriate accommodation; and lack of guidance at national level into the wider practical implications of cultural difference and how to most effectively respond to these. This was noted as being underpinned by: a lack of staff training and capacity in regard to cultural difference; high levels of staff turnover; and issues of institutional racism which impedes the ability of individual local authority staff who are trying to progress issues.

Figure 4. provides a synopsis of the key conflict-ambiguity issues that place Traveller accommodation policy implementation in the ‘symbolic implementation’ paradigm.



61 The Irish Human Rights and Equality Commission (2019). *Op cit.*

FIGURE 4: TRAVELLER ACCOMMODATION POLICY



Symbolic Implementation

This analysis of Traveller accommodation policy implementation in reflecting high conflict and high ambiguity, places policy implementation in this field, in the ‘symbolic implementation’ process paradigm identified by Matland and outlined above.

Matland notes that “policies that invoke highly salient symbols often produce high levels of conflict even when policy is vague”. The symbols are sufficient to create opposition. In this instance, the symbols evoked in the 1998 Act relate to Traveller culture and identity, recognition for cultural difference, and provision for its practical implications. The 1998 Act marked the first major policy step taken on foot of the Report of the Task Force on the Travelling Community (1995), introducing the first legislative recognition of cultural difference on foot of the Task Force recommendation that the distinct culture and identity of Travellers be recognised and taken into account in policy and provision.

Matland further notes that “symbolic policies play an important role in confirming new goals, in reaffirming commitment to old goals, or in emphasizing important values and principle”. The 1998 Act was confirming new goals and emphasising a key principle.

While the 1998 Act itself offers a clear roadmap to addressing the issue of Traveller accommodation, there is conflict and ambiguity associated with the delivery end of the implementation chain. In this regard, Matland notes that, “when dealing with cases of symbolic (policy) implementation, identifying the competing factions at the local level, along with the micro-level contextual factors that affect the strength of the competing factions, is central to accurate explanations of policy outcomes”.⁶²

62 Matland, R. E. (1995). *Op cit.* Page 170.

A recent paper by Norris, O'Sullivan, & Visser, on the implementation of Traveller accommodation policy also applies the Matland model and also places Traveller accommodation policy implementation within the 'symbolic implementation' paradigm.⁶³ Our analysis differs slightly from these authors in regard to the specific areas of high conflict and high ambiguity associated with the policy, and the understanding of symbolic implementation, and goes further to discuss the specific implications for policy implementation that arise from this analysis.

3.3 IMPLICATIONS

Matland's model posits that, in the 'symbolic' implementation scenario, policy implementation can be difficult to achieve. In such a scenario, the local delivery-level becomes more important than the macro-level, with the power of top-down drivers trammled. The quality and level of implementation will, therefore, vary across delivery sites.

In this scenario, delivery-level 'coalition strength' is identified by Matland as being the key outcome driver. Such 'coalitions' arise where the various stakeholders align according to their interpretation of the vision for the policy and its relationship to their interests. The strength of these 'coalitions' to limit or drive policy implementation is central to outcomes, and disagreement is resolved through coercion or bargaining. This coalitional strength will depend on local factors, and variations across local sites will occur. The role of professionals at this local delivery level is accentuated. National level actors retain some influence, through the provision of resources and incentives and through focusing attention on the issue, however, national-level monitoring is complex in a context of high ambiguity and high conflict at local level.

Building local coalitional strength in this policy field will usefully involve attention to the following: the identification and mobilization of potential coalition builders; effective coalition sites and structures, with the necessary power and capacity to progress implementation; the potential composition of such coalitions; the themes to be addressed by such coalitions; and the strategic contribution required of national-level policy actors.

Coalition builders

A number of interviewees for this research cited examples of local professionals using their roles to good effect to leverage progress on implementation of the Traveller Accommodation Programme, through building and maintaining relationships between the key stakeholders. These 'coalition builders' included local authority staff, and staff from local Traveller organisations.

Local authority staff who had built relationships of trust with the Traveller community and who had a good understanding of how things worked within 'the system', were noted as holding potential to play the role of interlocutor between the key stakeholders. Local authority social workers, Traveller liaison officers, and estate management staff were all seen as potential coalition builders from within 'the system'.

Interviewees cited a range of enablers for the effectiveness of this coalition builder role. A number of interviewees noted the need to invest time and staff resources to build and maintain a long-term engagement with the local Traveller community, as a critical pillar of coalition building. Without these relationships, a key dimension to coalition building, interviewees observed that the delivery of Traveller Accommodation Programmes would inevitably fail.

63 Norris, M., O'Sullivan, E., and Visser, A. (September 2021). *The Micro-politics of Traveller accommodation and Housing Provision: sites of conflict, ambiguous implementation and symbolic policy making*. UCD Geary Institute for Public Policy discussion paper series. Page 22.

The need for local authority staff to work closely with Traveller organisations to build relationships of mutual respect and trust was identified. Building relationships between local Travellers and other stakeholders, it was suggested, should not be considered the exclusive responsibility of the local Traveller organisation and/or individual Traveller representatives on the LTACC.

On this issue, it was noted that local Traveller organisations can be placed in a difficult position where they are sandwiched between their community, who are angry and frustrated with the slow pace of delivery, and the local authority, with their expectations of the Traveller organisations to get the community on board. Traveller organisations, it was observed, needed to reflect on this work in order to recognise and guard against being placed in such a 'gatekeeper' position.

Interviewees representing Traveller organisations observed that it was more productive to work with local authorities to demonstrate to them that another, better way was possible, rather than simply criticising them. These interviewees were, however, careful to maintain their critical voice, including supporting legal cases against the local authority, alongside this building a more productive relationship with them. An advocacy role could continue to be pursued to good effect outside of the coalitional spaces.

Senior management leadership to support and enable local authority staff to effectively play roles of coalition builder was noted. One interviewee suggested that while individual staff working on Traveller accommodation had done excellent work in developing good relationships between stakeholders, they ran the risk of becoming burned out, in particular, where they did not have sufficient support from management or engagement from other key local authority staff.

In one local area, an interagency process was undertaken with the aim of responding collaboratively to addressing conflict between the settled and Traveller communities and to enhance recognition and awareness of Traveller culture and provide opportunities for greater interaction between both communities. This project was identified as having a knock-on benefit of a coalitional nature, in enhancing engagement among LTACC members.

Coalition sites and structures

The LTACC is pointed to as an obvious structure through which to build local coalition strength for improved implementation of the Traveller Accommodation Programmes. While the majority of interviewees pointed to shortcomings in the current effectiveness and operation of the LTACCs, they were in agreement that enhancing this structure would support improved policy implementation. There were examples cited of effective collaborative LTACC engagement which had the effect of reducing policy conflict and/or ambiguity and progressing policy implementation.

The weaknesses of the LTACC space, as an effective driver for Traveller Accommodation Programme implementation, have been noted in the Expert Review Report: their lack of input into the development of Traveller Accommodation Programmes, including the needs assessment process; their limited role (consultative rather than decision-making); their limited scope to take proactive approaches to meeting Traveller accommodation needs; inconsistency in regard to the level of commitment of local authority officials assigned to the LTACC which has a strong correlation to their success; difficulty securing Traveller representation; a lack of interest in the LTACC from councillors, or their use of the space to oppose developments; and a 'confrontational and divisive' rather than a partnership approach.⁶⁴ These issues would need to be addressed for the LTACC to serve as an effective coalitional space for policy implementation.

Interviewees cited a range of enablers for the effectiveness of the LTACC as a site for coalition building. Leadership was emphasised and the imperative to have staff at the LTACC with a sufficient level of

seniority to make decisions and secure their implementation. An independent LTACC Chair with no local vested interest was cited as important by a number of interviewees. The value in the independence of the Chair was stressed, given the potential for conflict on the LTACC, and also, this person may at times need to be able to negotiate as an honest broker, with local authority management.

An agreed standard for the functioning of LTACCs was noted as effective in improving the efficacy of the space. One interviewee pointed to the value of making use of a protocol developed by the LTACC to establish a shared understanding and agreement with LTACC members in regard to what 'collaboration' and 'partnership' would look like for their collective work.

The use of LTACC sub-groups was cited as enabling operational issues to be progressed outside of LTACC meetings, so that these meetings do not become bogged down in the operational, and as allowing for a broader range of local authority professionals, for example, staff from planning and housing, to be brought to the table on issues relevant to their specific remit.

The capacity and skills of Traveller representatives on the LTACC was cited as important and the following was noted in this regard: Traveller representatives need a strategic base from which they can be informed, prepared, and enabled to be strategic in their representation on the LTACCs, which was seen as easier where these representatives are employees of local Traveller organisations; Local authorities could deliver training to Travellers on how the system works; and Travellers should not use the LTACC space to advocate for their own/family member accommodation needs.

- A forthcoming report on learning from the work of Galway City Council LTACC offers useful pointers for other LTACCs that would improve local coalition strength.⁶⁵ Some of the relevant issues identified in this report are:
- LTACC members need to acknowledge that the different stakeholders involved pursue their goals in different ways outside of the LTACC and that, there is a need to respect this difference, within the LTACC, as a distinct space for participative democracy, in particular, from any tensions resultant from the challenge necessarily involved in the advocacy work of Traveller organisations.
- To serve as an effective arena of participative democracy it is important to actively manage the tensions inherent in such a space and focus on: the quality of the relationships within the space that make it work; the careful management of inevitable tensions; and responding effectively and appropriately to any breakdown in these relationships.
- Shared capacity building and a formal setting out of how it intends to function and the values, commitments and ambitions underpinning this, assist the working relationships required for an effective LTACC.
- Values and the systematic engagement of agreed shared values on the LTACC enables it to function in a manner that is respectful, empowering, collaborative, and inclusive of all members and their contributions.



65 Crowley, N. (forthcoming). Galway City Council Local Traveller Accommodation Consultative Committee: Experience and Learning.

Coalition composition

The composition of the LTACC was seen as important for its effectiveness, particularly in having the participation of the right local authority staff from across relevant departments (from the planning, housing, and community sections, for example). It was observed that a wider range of professionals could usefully be involved in such local coalitions, including engineers and planners. One interviewee noted that Traveller accommodation teams need a dedicated engineer working on maintenance and design, rather than bringing in consultants. A dedicated person in the role would allow the local authority to build trust with the local Traveller community and would also develop local authority understanding of how to deliver culturally appropriate accommodation.

It was noted that Traveller organisations could broaden any local coalition by developing strategic relationships with potential allies. One interviewee identified how their organisation had developed their involvement in local fora (such as the Local Community Development Committees, the Housing Strategic Policy Committee, and Traveller Interagency Group) to build alliances that would further lever progress on Traveller Accommodation Programme implementation.

Finding new actors with which to develop strategic alliances, such as approved housing bodies, was cited as an area of potential that had yet to be developed in coalition building at local level.

Coalition themes

The core theme to be addressed by local coalitions is that of policy implementation, and specifically to shape Traveller Accommodation Programmes to ensure they are fit for this purpose, and to secure implementation of Traveller Accommodation Programmes. Further coalition themes emerge as part of this analysis: local coalitions need to devise and pursue models of policy implementation that address the policy conflicts and policy ambiguities that have been identified.

One of these further themes, for local coalitions, is to explicitly address policy conflict issues that persist in relation to the need for, and nature of culturally appropriate accommodation provision. This points to a requirement for models of intervention that involve collaborative engagement between key stakeholders to co-design culturally appropriate models of accommodation. It also points to a requirement for models of intervention that: involve meaningful participation with local Traveller communities to capture and track accommodation preferences; and can evolve to respond effectively to these preferences and to the manner in which Traveller choose to live out their cultural identity.

Cena was identified, by a number of interviewees, as offering potential in addressing this theme.⁶⁶ Cena has developed a model to enhance engagement with the local Traveller community to more accurately determine accommodation needs in partnership with local Travellers. This model has assisted in reducing policy ambiguity in regard to Traveller accommodation preferences and in regard to what constitutes culturally appropriate accommodation. Interviewees spoke positively about their engagement with Cena which resulted in: improved relationships between local Travellers and the local authority; and outcomes achieved in regard to the delivery of culturally appropriate accommodation, including new models of such accommodation.

⁶⁶ Cena is an Approved Housing Body that is working for and with Travellers to address critical accommodation needs.



Another such theme for local coalitions, is to devise and model a dual approach that links targeting and mainstreaming of Traveller needs and aspirations in this policy field, ensuring a balance of attention to both. This requires a particular focus on mainstream provision, with a concern for devising and modeling culturally appropriate provision of both mainstream housing services and mainstream homeless services to Travellers.

Local coalitions would usefully agree on the design for such models and ensure that they are effectively applied.

National drivers

The emphasis on local coalition building is not to suggest that there is not a role for national drivers in a context of symbolic policy implementation. This model of policy implementation has implications for the work and further evolution of such national drivers, in particular for the Traveller Accommodation Unit of the Department of Housing, Local Government, and Heritage, and the NTACC. The starting point could usefully focus on the contribution to be made by national drivers to effective coalitional building at local level.

If the LTACCs are to become sites of potential coalition strength, the barriers cited above, from the Expert Review Report and the research interviewees, will need to be addressed. The national drivers could play a role in addressing some of these barriers through legislative, policy, and administrative steps.

Interviewees operating at national and local level emphasised that LTACCs needed to have increased powers so that Traveller Accommodation Programme implementation could be improved. It was further noted that increasing the powers of LTACCs, would result in local authorities assigning more senior staff to them, and elected representatives would be minded to become involved in their operation.

Increasing the powers of LTACCs, however, could increase the level of conflict associated with the Traveller Accommodation Programmes, given that there would potentially be more at stake for vested interests. In such a scenario, the strategic capacity of Traveller representation on LTACCs would become even more critical. National Traveller organisations and the national drivers for policy implementation could play a role in resourcing and supporting this capacity building, in particular, by focusing on how local coalition power might be built and strengthened locally, both within and outside of the LTACC structure, with the goal of driving enhanced implementation of the Traveller Accommodation Programmes.

There are further important roles identified by interviewees as needing to be played and reinforced by national drivers. These related in particular to monitoring, good practice standards and guidance, and capacity building.

The NTACC, it was suggested, could be enhanced to have a monitoring role akin to monitoring of homeless provision with its quarterly reports. This monitoring should be strengthened and informed by an ethnic identifier on the Pathway Accommodation and Support System (PASS) and in the social housing form.

The recent introduction of a 'Traveller identifier', while falling short of an ethnic identifier, in housing services was noted by interviewees as having potential to reduce ambiguity in regard to Travellers accommodation preferences. One interviewee noted, however, that this identifier in the social housing form will only work if Travellers opt to identify as Travellers on the form and that there was a role for Traveller organisations in raising awareness across the community in this regard. Training for those administering such a system was identified as a requirement.

The Traveller Accommodation Unit, it was suggested, could develop a template outlining the requirements of LTACCs in regard to their role. This could usefully include a stipulation for yearly reporting on Traveller Accommodation Programmes to the unit and the NTACC. The unit could develop guidance on what constitutes culturally appropriate accommodation. The NTACC could develop a set of good practice standards, using such as the Cena model, for the needs assessment process by local authorities.

The national drivers could resource: capacity building and co-creation; spaces for sharing examples of innovation and models of inclusive practices; and local pilot projects that are testing new ways to deliver at local level. These suggested initiatives have potential to reduce policy ambiguity and conflict at local level.

A further potential lever to reducing policy ambiguity, in regard to the Traveller accommodation needs assessment process, was noted in regard to the recent Housing Need and Demand Assessment (HDNA) requirement on local authorities.⁶⁷ Under the national planning framework, local authorities are required to undertake a HDNA to support a more robust and evidence-based assessment of need in their administrative areas. This requirement could provide a lever to drive a more robust approach to the Traveller accommodation needs assessment process.

There are other national actors, of a regulatory nature, on the pitch with potential to offer new national levers in strengthening policy implementation. These encompass the Office of the Planning Regulator, the Irish Human Rights and Equality Commission, and the Ombudsman for Children Office. A coordination across these different regulators could be valuable alongside a tighter relationship with the existing national drivers for Traveller accommodation so that they could inform monitoring systems and good practice standards and guidance as they are strengthened.

The Office of the Planning Regulator (OPR) is a new national actor on the pitch. The OPR has a monitoring role regarding the local development plans (LDPs). The OPR's recent paper on Traveller accommodation was a useful call to local authorities to improve their practice in regard to set out their proposed plans regarding TAPs, in their LDPs.⁶⁸ This call and the guidance developed need to be followed up, monitored, and fully implemented.

The Irish Human Rights and Equality Commission (IHREC) has a broad role in the promotion of equality, combating of discrimination, and protection of human rights. The recent work of IHREC in inviting local authorities to conduct an equality review on Traveller accommodation and in making recommendations to local authorities on foot of this, has strengthened a human rights and equality underpinning to policy implementation in this field.⁶⁹ These recommendations need to be followed-up, monitored, and fully implemented.

The Ombudsman for Children Office has a mandate to work to protect the rights of children and young people in Ireland. Its recent work in undertaking investigations into the living conditions of children on Traveller-specific accommodation has strengthened a human rights imperative for policy implementation.⁷⁰ These investigations need to continue and their findings and recommendations followed-up, monitored, and fully implemented.

67 Department of Housing, Local Government, and Heritage [Website](#). Last accessed February 23, 2022.

68 Office of the Planning Regulator (2019). *Traveller Accommodation and the Local Authority Development Plan*. OPR Case Study Paper CSP03.

69 The Irish Human Rights and Equality Commission (2019). *Op cit*.

70 Ombudsman for Children Office (2021). *Op cit*.

A further development, of relevance as a national driver, is the establishment in 2021 of the Programme Board, to oversee implementation of the recommendations of the Traveller Accommodation Expert Review Group. This is a participative structure that includes Traveller and city and county management association representation. It implements a work programme to address these recommendations, makes recommendations to the Minister, and reports on progress. This is a time-limited structure but is noted as holding potential to drive change in relation to the context for policy implementation in this field and in relation to policy implementation structures and systems based on the recommendations of the Expert Review Group. Its work is currently ongoing and its impact will have relevance for the nature of and approach to local coalition building in this policy field.



04



health

Policy Implementation: Traveller Health

4.1 LITERATURE REVIEW

Policy Framework

The national policy framework to drive outcomes in regard to Traveller health, is currently in transition. At the time of writing, the draft National Traveller Health Action Plan has yet to be published by the HSE, but its publication is deemed imminent. The history leading up to the current situation in regard to the Traveller health policy framework, reflects a journey marked by high degrees of policy conflict. The absence of the action plan reflects and gives rise to a high degree of policy ambiguity.

The lack of a National Traveller Health Action Plan, leaves the National Traveller and Roma Inclusion Strategy 2017-2021 (NTRIS) as the key national policy framework for Traveller health. The NTRIS contains thirty-five specific health actions.⁷¹ These include a commitment by the HSE to develop the National Traveller Health Action Plan (NTHAP) employing a social determinants of health approach. There is a further commitment to review the existing arrangements for engagement of the Department of Health and the HSE with Traveller representative organisations, to improve current arrangements.

A dual approach, while not specifically named as such, is evident in the NTRIS commitments encompassing, and linking, mainstreaming and targeting:

- Commitments are made in relation to mainstreaming, that specifically reference a Traveller focus in mainstream policy, specifically Healthy Ireland, and Traveller access to mainstream drug and alcohol services, the mental health clinical programme, and primary and secondary mental health services. Mainstreaming is necessarily underpinned and shaped by commitments to the use of an ethnic identifier and to securing culturally appropriate and culturally competent service provision.
- Commitments are made in relation to targeting, in particular, through: an expansion of Traveller Primary Healthcare Projects; allocation of specific funding for Traveller health initiatives, through continuation of the Traveller counselling service; targeted initiatives for men; and specific interventions and education materials to support good mental health and suicide prevention. In part this targeting includes initiatives to enable access to mainstream services, including through: the appointment of mental health service coordinators to support Traveller access to mental health services; and a network of peer support workers to support access addiction rehabilitation services.

The lack of a National Traveller Health Action Plan, leaves the 2010 All Ireland Traveller Health Study (AITHS) as the foundation stone for action in relation to Traveller health.⁷² For example, the regional Traveller Health Units have looked mainly to the AITHS, and more recently to the NTRIS, as their guide in developing their strategic plans.⁷³

71 National Traveller and Roma Inclusion Strategy 2017-2021. Pages 33-36.

72 Kelleher, C., et al. (2010). All Ireland Traveller Health Study: Our Geels. School of Public Health, Physiotherapy, and Population Health, University College Dublin.

73 See for example: CHO1 Traveller Health Strategic Plan 2018-2022.

The AITHS, published in 2010, was undertaken in response to the recommendation in the Department of Health and Children's National Traveller Health Strategy 2002–2005. The AITHS presented stark evidence of the significant health inequality gap between Travellers and the majority population, and, furthermore, identified that this gap had widened since the previous Traveller health study, conducted in 1987.⁷⁴ It identified four key areas for intervention: mother and child services; men's health; cause-specific issues for respiratory and cardio-vascular disease; and a new model of primary care delivery. Alongside highlighting the need for action in relation to a number of specific social determinants of Traveller health, it highlighted the need for a cross-sectoral strategic action plan, with a firm commitment to implementation, targets, and timeframes.⁷⁵

The AITHS data presented a potential watershed moment for a renewed impetus to develop an evidence-based policy framework to improve health outcomes for the Traveller community. Two years on from the publication of the AITHS, however, concerns were raised by the Chair of the National Traveller Health Advisory Committee (NTHAC), that no such discernible action was evident: "Despite significant investment and commitment, there have been no tangible actions to respond to the stark findings in the AITHS."⁷⁶ The NTHAC Chair further noted his concerns regarding policy leadership and drivers for Traveller health: "Increasingly there is a sense emerging that the responsibility as well as the budget for Traveller Health has been decentralised (from the Department of Health and Children) and delegated to the HSE. There is a reluctance by the social inclusion unit in the Department (of Health and Children) to take the lead on Traveller health, in particular in relation to taking action on the findings of the AITHS."⁷⁷

In 2018, eight years after the publication of the AITHS, the process to develop a National Traveller Health Action Plan (NTHAP) was commenced with a series of regional consultations, with Traveller representatives, to inform its development. A discussion paper setting out a draft framework for the NTHAP was developed and circulated in advance of the regional consultations. The report of the consultation outcomes advised that "The draft framework proposed an overall approach to the NTHAP: mainstreaming and horizon scanning; targeting and outreach; implementation and participation; and progress and research. None of the consultations suggested amendments to the overall approach."⁷⁸

High-level priority areas were reiterated by stakeholders across all of the consultations. Those relevant to policy implementation included the following:

- development of a SMART NTHAP (underpinned by community development), inclusive of timelines, ring-fenced resources and a strong monitoring and evaluation framework;
- ensure NTHAP compliments existing Traveller health infrastructure (Traveller Health Units);
- ensure an evidence base for Traveller health through the implementation and rollout of ethnic equality monitoring in HSE;
- actions in the NTHAP must be integrated into national service and operational plans particularly in the areas of mental health/suicide, counselling and alcohol/drug addiction; and
- the NTHAP must have local implementation with each HSE Chief Officer developing a local Traveller health implementation plan.⁷⁹

74 Barry, J., Herity, B., and Solan, J. (1989) *The Travellers' Health Status Study: Vital Statistics of Travelling People, 1987*. The Health Research Board.

75 Kelleher, C., et al. (2010). *Op cit*. Page 172.

76 McCarthy, O., (2012). *Report on the Workshop of National Traveller Committees*. Department of Justice and Equality. Page 30.

77 *Ibid*. Page 31.

78 Watt, P. (June 2018). *National Traveller Health Action Plan: Summary Report of Regional Consultative Meetings*. Prepared for the HSE National Social Inclusion Office. Page 3.

79 *Ibid*.

This consultation and these directions point to a dual approach of interlinked mainstreaming and targeting. Following the regional consultations, a draft NTHAP was submitted to the HSE in November 2018.

In March 2019, the HSE released an updated edited version of the draft framework of the NTHAP. Concerns were raised by Traveller organisations that this version of the NTHAP contained none of the recommendations from the 2018 consultations (which had been reflected in the 2018 draft) and that the new draft had been largely stripped of a social determinant focus. In response to concerns expressed by Pavee Point to the HSE, the HSE noted that the November 2018 draft was “very broad in its scope highlighting the full range of potential actions across government departments and agencies and indeed was far more extensive in its reach than the responsibilities of the HSE.”⁸⁰



In an update on its work to the NTRIS Steering Group, the HSE advised that “in the context of the most recent feedback (on the draft NTHAP) it is clear that further work remains to be done” and committed to releasing a final plan by quarter four 2019.⁸¹ To aid this process, the HSE established a NTHAP Steering Group, chaired by a Chief Officer, to get the plan to final draft stage. The onset of COVID-19 delayed this process. However, a final draft of the NTHAP has been submitted to the Department of Health for approval and the HSE is awaiting departmental agreement on the Plan.

At the same time as seeking a Traveller-specific health strategy, with an effective national driver, national Traveller organisations have highlighted the need for mainstream national health policies to name Travellers as a specific target group. The National Traveller Women’s Forum, for example, has expressed concern that “Health issues for Travellers have been excluded entirely from all mainstream health-related strategies including the current Healthy Ireland Framework.”⁸²

The Department of Health, in what would appear to be a desire to move away from a targeted policy approach, advised the Oireachtas, in 2019, that “The Department is developing an inclusion health policy to address the extreme health inequalities experienced by Travellers and other socially excluded groups. The aim is to deliver on a core objective of the Sláintecare reform programme for the health services: an integrated model of care for people with complex needs.”⁸³

The 2020 Programme for Government includes three specific commitments in regard to Traveller health. These are targeted in nature: to publish a Traveller and Roma mental health action plan; to implement a National Traveller Health Action Plan; and to ensure supports and pathways to access (substance misuse) treatment for homeless, Travellers, and new communities.⁸⁴

80 Correspondence to the Director of Pavee Point Traveller and Roma Centre, from the Director of Community Strategy and Planning, HSE. July 1, 2019.

81 HSE Progress Update to the NTRIS Steering Group. July 3, 2019.

82 National Traveller Women’s Forum (October 2019). Opening Statement on Health to the Special Joint Committee on key issues affecting the Traveller Community.

83 (October 2019) Opening statement to Joint Committee on key issues affecting the Traveller Community Jim Walsh, principal officer, Drugs Policy and Social Inclusion Unit, Department of Health.

84 2020 Programme for Government: Our Shared Future. Pages 49, 50 and 77.

Implementation Structures

The current structures focused on Traveller health are the National Traveller Health Advisory Forum (NTHAF) at national level and the Traveller Health Units at regional level.

At national level, the NTHAF, established in 2006, is comprised of representatives from the HSE, Traveller Health Units (THUs), and Traveller organisations. Its remit is to:

- Advise on the key priorities for Traveller Health as they relate to all health providers, including findings of the All Ireland Traveller Health Study.
- Set guidelines and principles to inform the allocation and accountability principles of the Traveller health budget.
- Highlight emerging needs and issues and possible responses.
- Share knowledge, experience and good practice in relation to Traveller health and seek to replicate where appropriate.
- Advise on the cultural appropriateness of services.
- Advise on best practice standards to be implemented nationally taking a community development approach.
- Act as an effective link between national, regional and local levels.
- Discuss issues that are common to all THU's.
- Contribute to the decision making process in relation to Traveller Health.
- Support partnership working.
- Advise on implementation of the national strategy, including linking with and supporting implementation of prioritised recommendations of the HSE National Intercultural Health Strategy, with particular reference to actions contained in the HSE National Service Plan.
- Promote and support development of data collection aimed at facilitating evidence based planning, monitoring and reporting around the health needs and outcomes of service users from the Traveller community.⁸⁵

The NTHAF was preceded by the National Traveller Health Advisory Committee (NTHAC), established in 1998 on foot of recommendation in the Report of the Task Force on the Traveller Community.⁸⁶ The NTHAC membership comprised of the Department of Health and Children, the HSE (formerly the Health Boards), and Traveller organisations. Its terms of reference included to “review and draw up national policy for health strategies to improve the health status of the Traveller community” and to “ensure that Traveller health is a priority area within the Department of Health and Children and other relevant departments, and setting targets against which performance can be measured.”⁸⁷

The NTHAC has been positively assessed by Traveller organisations as having achieved in: developing the first Traveller Health Strategy (2002-2005); piloting the use of an ethnic identifier in data collection; and driving the All Island Traveller Health Study.⁸⁸ A decade following the publication of the 2002-2005 Strategy, however, the Chair of the NTHAC was to advise that “Less than 50% of the actions in (the Strategy) have been implemented.”⁸⁹

85 CHO1 Traveller Health Strategic Plan 2018-2022.

86 Report of the Task on the Travelling Community, Department of Equality and Law Reform, 1995.

87 Hanafin, S. (2013). Review of Traveller Health Advisory Committee. Department of Health, June 2013. Page 8.

88 Pavee Point (October 2019). Op cit.

89 McCarthy, O. (2012). Op cit. Page 27.

In 2012, the Chair of the NTHAC noted concern that, increasingly, there was a narrower representation of the different health portfolio areas (such as public health, general medical services, and child health) on the NTHAC, which, he observed, was a retrograde move in terms of action to ensure mainstream health services were accessible to Travellers.⁹⁰

In October 2012, the NTHAC convened for what would be its last meeting, following a decision by the Department of Health to disband the committee. This decision seems to have arisen in response to a review, commissioned by the Department in 2013, on the role and functioning of the NTHAC.

The 2013 review identified two core changes to the functioning environment for the NTHAC, following the transfer of the national health budget to the HSE in 2006: funding for the THUs became the responsibility of the HSE, with the NTHAC no longer having a role on how this budget was allocated; and the NTHAC no longer had control over resources to allocate to specific Traveller health projects, as it had previously. A further key challenge to the proper functioning of the NTHAC cited, was the poor relationships and lack of trust between members.⁹¹

The review noted a general agreement, among NTHAC members, that the responsibility for a national Traveller health strategy lay with the Department of Health and, furthermore, in the absence of this type of policy statement it would be “problematic for the HSE to drive key actions and activities, particularly with divisions other than the (Department of Health) Social Inclusion Unit.”⁹² A related issue, to the need for a coherent nationally driven policy, was the noted concern that the regional THUs were operating on the basis of locally identified priorities, rather than nationally driven policy, and that there was very little transparency in regard to budget allocations and expenditure regarding Traveller health.⁹³

The review recommended that the NTHAC and the NTHAF be disbanded in favour of a new committee, which would include representatives from the HSE and the Department of Health, and be located within the HSE Health and Wellbeing Directorate. The outcome of the review saw the Department of Health leaving in place the NTHAF and, while not formally disbanded, the NTHAC was not convened again. This meant an absence of departmental-level representation on the sole national structure in place for Traveller health. The Department of Health did propose at one point that a representative from the Department would sit on the NTHAF, however, this was not agreed by the stakeholders.

At an Oireachtas Committee meeting on Traveller health, in October 2019, the Department of Health advised that the HSE rather than the Department of Health, is the appropriate driver for policy implementation and that, while the Department “is committed to being part of that structure, there’s no point in having a structure in the Department of Health when all the action is somewhere else. The action is in the HSE, and we’re happy to be part of that with Traveller organisations.”⁹⁴

The report of the aforementioned 2018 consultation process to develop the National Traveller Health Action Plan included recommendations for the policy implementation framework that should accompany the national plan: a new planning advisory body for Traveller health (PATH) was recommended which would in effect merge the roles of the NTHAC and NTHAF, to become a national policy driver. Stakeholders noted the lack of accountability for the Traveller health budget and the lack of new developments/resources allocated to Traveller health since 2008.⁹⁵

90 *Ibid.* Page 31.

91 Hanafin, S. (2013). *Op cit.* Pages 1 and 11.

92 *Ibid.* Page 5.

93 *Ibid.* Page 7.

94 Oireachtas Committee on Key Issues Affecting the Traveller Community. October 22, 2019. Debate discussion from 1:21:30 to 1:22:30.

95 National Traveller Health Action Plan: Summary Report of Regional Consultative Meetings. (June 2018). Prepared for the HSE National Social Inclusion Office.

At regional level, the Traveller Health Units (THUs) originated from recommendations in the Report of the Task Force on the Traveller Community.⁹⁶ They are partnership structures between the HSE and local Traveller organisations and there are currently seven THUs operating at HSE CHO level nationally.⁹⁷ Their remit, as recommended in the Task Force Report, includes to: monitor the delivery of services to Travellers and set regional targets; ensure that Traveller health is given prominence on the health agenda; support the development of Traveller-specific services; and collect data on Traveller health and utilisation of health services.⁹⁸ The THUs are responsible for coordination and management of local level delivery of initiatives through the Traveller Primary Health Care Projects.

Traveller organisations have noted that the THU infrastructure is underfunded and does not have a protected budget line, and the local level infrastructure, the Traveller Primary Healthcare Projects, is deemed to be disintegrating, due to severe underfunding and a lack of investment for over a decade. In a report to the Oireachtas, Pavee Point advised that, “in 2007, €1 million was allocated for Traveller health developments, of which, €100,000 was allocated towards the all-Ireland Traveller health research and the remainder was put towards balancing the HSE budget. Similarly, in 2008 a further €1 million was allocated to Traveller health developments and the HSE introduced a stipulation that one could only spend in 2008 what was spent in 2007. Therefore, once again €900,000 of the Traveller health budget went to balancing the HSE budget.”⁹⁹

4.2 TRAVELLER HEALTH POLICY: APPLYING THE AMBIGUITY-CONFLICT MODEL

In this section Matland’s ambiguity-conflict model is applied to further illuminate policy implementation issues regarding Traveller health policy. Firstly, we establish the level of policy conflict and policy ambiguity associated with the implementation of Traveller health policy (summed up in Figure 5.). Secondly, we identify the implications of this analysis in regard to the policy implementation process. In conclusion, we set out considerations for a more effective implementation of Traveller health policy.

Policy Conflict

On the low-to-high policy conflict continuum, Traveller health policy is one of high policy conflict. The review of the literature, and the interviews with stakeholders, present evidence of three areas of conflict, all relating to policy means:

- divergent stakeholder views regarding the level of emphasis that should be placed on mainstreaming and/or on targeting as the most appropriate approach to lead with in addressing Traveller health inequalities;
- divergent stakeholder views on whether Traveller health policy should be underpinned by a social determinants approach; and
- divergent stakeholder views on the most appropriate national structure to drive implementation of Traveller health policy.

Each of these three areas is briefly examined below.

96 Report of the Task on the Travelling Community, Department of Equality and Law Reform, 1995.

97 While there are 9 HSE CHO areas, the Eastern THU covers 3 CHO areas (CHO 6, 7, and 9).

98 Report of the Task Force on the Travelling Community (1995)

99 Pavee Point (October 2019). Pavee Point Opening Statement to the Special Joint Committee on key issues affecting the Traveller Community: Health.

Targeting versus mainstreaming:

A dual approach, interlinking targeting and mainstreaming, is evident in:

- The Report of the Regional Consultative Meetings on a NTHAP, which recommended that the NTHAP must have a “focus on both mainstreaming and targeting actions”,¹⁰⁰
- The NTRIS commitments in the health field, which evidence a dual approach to Traveller health encompassing mainstreaming and targeting; and
- The 2020 Programme for Government which includes three specific commitments in regard to Traveller health that are targeted in nature.

Some interviewees for this research emphasised the imperative of the targeted element in this dual approach. Traveller health inequalities, it is noted, are so significant that we cannot wait for a mainstreaming approach to address these issues. The ‘lift’ provided, with a targeted approach, is necessary in order to create the conditions for, and enhance mainstreaming. To maximise this dual approach, mainstream providers have to be open to learning from the outcomes of the targeted approach, in particular, applying this learning to make the necessary adaptations to mainstream provision to increase access, participation and outcomes for Travellers.

In the absence of a targeted Traveller health policy, it was further suggested, Traveller health will become even more marginalised within the health services than is currently the case. To illustrate this point, a number of interviewees suggested that even within the social inclusion divisions (of the Department of Health and the HSE), which have responsibility for Traveller health, the issue of Traveller health is not given sufficient priority or resourcing, evidenced by the worsening conditions of the Traveller Primary Healthcare Projects infrastructure at local delivery level.

On the other hand, some interviewees pointed to the range of important policy initiatives currently in train to address health inequalities that Traveller health issues need to be mainstreamed into. These include the Healthy Communities initiative, the Women’s Health Action Programme, and the Sharing the Vision mental health policy. These initiatives and policies, it was argued, because of their sole focus on health inequalities, offer fertile ground for a specific focus on Traveller health, with Traveller health issues less likely to get ‘lost’ as might be the case in a broader health policy.

The current direction of policy travel, both for the Department of Health and the HSE, it was argued, is not reflected in the current draft of the NTHAP. The Sláintecare reforms, for example, are prioritising the Healthy Communities initiative as a central pillar in addressing health inequalities. While targeting to address Traveller health inequalities is necessary, this should, some interviewees argued, be in the form of targeted initiatives, named within broader policies to address health inequalities, rather than a standalone NTHAP.

Finally, it was suggested by some interviewees that having a standalone NTHAP could potentially isolate Traveller health policy even further, particularly if key objectives to address Traveller health inequalities are not carried over into other broader policy initiatives to address health inequalities, where much of the resources are being concentrated. The potential for missed opportunities in this regard, was stressed.



¹⁰⁰ Watt, P. (June 2018).Op cit. Page 9.

Social determinants of health approach:

An imperative to take a social determinants of health approach, is evident in:

- The 2010 AITHS, which was underpinned by a social determinants of health approach and which recommended the development of a “cross-sectoral” national Traveller health strategy; and
- The NTRIS, which includes a HSE commitment to develop a NTHAP employing a social determinants of health approach.

Traveller organisations expressed concern that a reworked version of the NTHAP, circulated in March 2019, was largely stripped of the broader social determinants focus that had been contained in the initial draft.

Some interviewees noted that the findings of the AITHS evidence the need for a social determinants approach and that failing to address key adverse social determinants, in particular racism, will hamper approaches to mainstreaming. These interviewees suggested that policy areas that are getting departmental priority, such as the Healthy Communities initiative, are more health focused than a social determinants model would envisage. They were concerned that the only social determinant that policymakers appear willing to acknowledge is poverty, however, this is insufficient to address barriers resulting from inadequate or inappropriate responses to cultural difference and from racism and discrimination.

On the other hand, some interviewees argued that the social determinants of health approach lacks sufficient specificity to health services and to areas within the remit of the Department of Health and the HSE. It was further suggested that if a social determinants approach is to be pursued as an underpinning approach to a national policy, the range of government departments with specific remits across the various social determinants would need to be at the table when the policy is being developed, to secure agreement on the objectives they will pursue.

A number of interviewees noted some potential in the NTRIS structures to pursue a social determinants approach, given the cross-departmental focus, however, it was acknowledged that these structures had yet to perform adequately in such a regard. At local level, interviewees noted that the players were not at the table for an effective social determinants approach. It was noted, however, that some strong partnerships had developed of a cross-agency nature, through the Local Community Development Committees and the Children and Young People’s Services Committees. The Traveller Interagency Groups are another possible avenue, though their effectiveness was questioned by some interviewees.

The national structure to drive implementation of Traveller health policy:

policy conflict is evident as to which is the most appropriate national structure to drive policy implementation and in regard to the powers and composition required of such a structure to secure its effectiveness.

The 2013 review of the NTHAC noted a general agreement, among NTHAC members, that the Department of Health was the appropriate national driver as it would be difficult for the HSE to drive key actions and activities beyond the social inclusion remit. At an Oireachtas Committee meeting in October 2019, the Department of Health advised that the HSE, rather than the Department of Health, is the appropriate driver for policy implementation.



Some interviewees suggested that the HSE is the engine for health policy implementation, therefore, should assume the role of key driver for the NTHAP, with Departmental representation on any such implementation structure. Other interviewees articulated a concern that currently the Department of Health is not assuming any responsibility for Traveller health and there appears to be no accountability for the lack of a dedicated departmental funding stream for the HSE to address Traveller health.

Regarding national structures of a more participative nature, the report of the 2018 consultation process to develop the National Traveller Health Action Plan recommended a new planning advisory body for Traveller health, which would in effect merge the roles of the NTHAC and NTHAF. Some interviewees suggested that Traveller organisations have found it difficult to move beyond the situation that pertained when the NTHAC was in place. On this, it was noted by these interviewees, that there have been many changes since that time, in particular, the HSE is now much more central, and the Department more peripheral, to the policymaking and policy implementation processes.

In relation to powers and composition, some interviewees noted that the national driver should have the power to drive cross-departmental actions. Power was clearly linked to the issue of composition of the structure in both the literature review and by interviewees. As previously noted, before the NTHAC was disbanded, its Chair voiced concern at the lack of representation on NTHAC from the broad range of health portfolio areas required to drive mainstreaming. Some interviewees suggested that it is important to have Departmental buy-in for effective implementation of the NTHAP, in particular, to ongoing commitment of resources and its ability to get key players, from other parts of government, to the table.

The only national structure, of a participative nature, currently in place to drive the NTHAP is the NTHAF. It was suggested, however, that the NTHAF was established as an advisory forum, not a policy driver, and currently has insufficient decision-making power to play such a role. It was further noted that the NTHAF is only comprised of social inclusion health actors, and Traveller stakeholders. A much broader and senior representation from across HSE directorates would be required to enable this structure to function as a policy driver. When the NTHAC was in place, it was pointed out, this allowed the NTHAF to play a more effective policy driver role, as there was a direct link into the Department, through the NTHAC.

If the NTHAF was strengthened, it was suggested, it could function as a policy driver. This strengthening, in terms of composition, would need to involve: an independent chair; a senior HSE official to assume overall responsibility for the NTHAP across the new enhanced community care teams; senior HSE staff from all of the relevant areas; senior level representation from the Department of health; and Traveller representatives. It was observed that, a senior-level HSE official is required, to assume responsibility for driving, monitoring and accounting for the delivery of the NTHAP across the new enhanced community care teams and networks and monitoring what they are doing to reduce Traveller health inequalities.

Other interviewees, on the other hand, suggested that the NTHAF should not assume the policy driver role. The NTHAF, it was noted, currently plays an important networking role for THUs to: share information; disseminate learning and share good practice; and work collaboratively to improve ground level delivery. This role would be lost were the NTHAF to assume the role of a policy driver. The policy driver, it was suggested, needs to be a higher-level entity with senior HSE and Departmental officials.

More broadly, some interviewees suggested that there is a need for a single high-level policy driver for all Traveller policy areas (health, education, accommodation, employment). Such a driver would be in the form of a national agency working cross-departmentally.

It was noted by some interviewees that the conflict over national structure was damaging to the sort of relationships between stakeholders that are key to any effective national structure.

Policy Ambiguity

On the low-to-high policy ambiguity continuum, the situation regarding Traveller health policy is one of high ambiguity. The review of the literature and the interviews with stakeholders present evidence of three areas of policy ambiguity:

- ambiguity of policy goals and objectives;
- ambiguity in regard to an approach rooted in emphasising a focus on disadvantage rather than a focus that also includes cultural diversity and its practical implications as a further imperative; and
- ambiguity in a context of significant health sector reforms in train.

Each of these three areas is briefly examined below.

Ambiguity in regard to policy goals and objectives:

This ambiguity exists largely due to the absence of the NTHAP. Notwithstanding the health action commitments contained in the NTRIS, a policy vacuum at national level has existed since 2005, when the previous Traveller health strategy ended. This policy vacuum has created policy ambiguity in regard to: the priorities being pursued at delivery level; and the approach to the model of delivery at local level.

In the absence of a national Traveller health plan, interviewees suggested, there is no clear policy path for THUs. As a result, the policy direction of individual THUs is dependent on the priorities of the Chief Officers in those areas, rather than a coherent policy approach on a number of key issues, across all THUs. Interviewees noted that the THUs have developed their own Traveller health strategies. In the absence of the NTHAP, it was suggested that the NTHAF should set the key priorities for all THUs.

The 2010 AITHS has been used to inform the local THU strategies. However, it was pointed out that the AITHS is not a strategy document, and furthermore, it is now considered to be out of date in a number of key areas, such as mental health. With each THU developing their own local strategy, there is a lack of coherence and consistency in regard to priorities being pursued across the THUs.

In the absence of a national policy, it was noted, there is greater inconsistency in the delivery approach at regional and local level. Interviewees noted, for example, different understandings of what constitutes a community development approach, across THUs. Some Traveller Primary Healthcare Projects were noted as delivering services rather than supporting Travellers to access mainstream services, which was described as a distortion of the original model.

Ambiguity in regard to an approach rooted in emphasising a focus on disadvantage rather than a focus that includes cultural diversity and its practical implications as a further imperative:

This area of ambiguity is evident in divergent stakeholder views about what does or does not constitute an effective approach in a context of ethnic diversity, and disadvantage along ethnic lines.

As noted in the literature review, the Department of Health has advised of a developing focus on an 'inclusion health' approach. The aim is to deliver on a core objective of the Sláintecare reform programme for the health services: an integrated model of care for people with complex needs. Some interviewees noted that the concept of 'inclusion health', to improve access to healthcare for socially excluded groups, offers important potential for a focus on improving Traveller access to healthcare. The approach, it was suggested, recognises that where the health system is not attuned to the needs of excluded groups, this requires a model of healthcare delivery that is a bit different. Some interviewees suggested that targeting of this nature, that is more broadly directed towards disadvantage, is sufficient as an effective approach to addressing Traveller health issues. Once Travellers are named in such policies, it was argued, their health needs will be more effectively met.

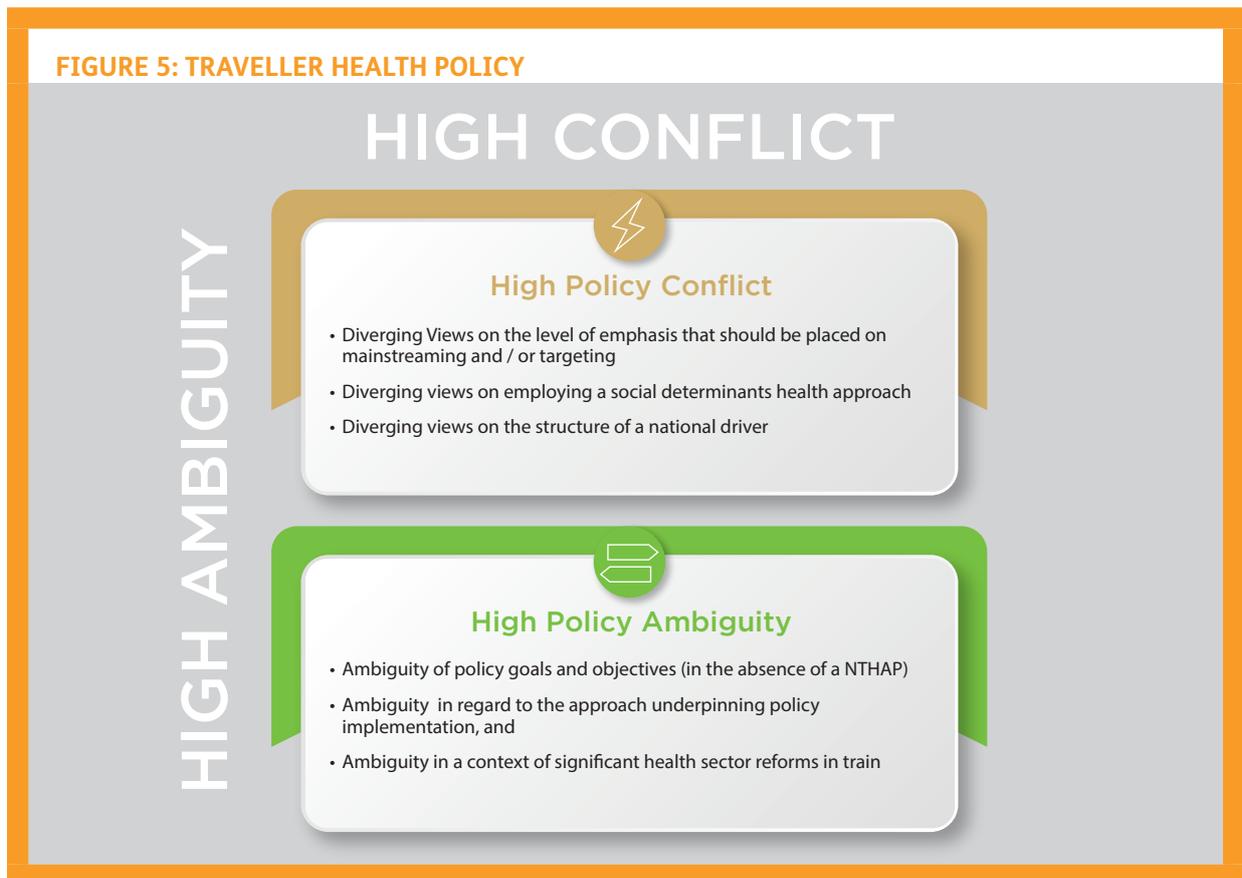
On the other hand, some interviewees suggested that such targeting that is more broadly directed towards disadvantage does not sufficiently address inequalities that arise as a result of both material disadvantage *and* cultural difference. This concern, regarding a targeting of disadvantage approach, is noted as being further compounded by population-based approaches to targeting of disadvantaged. These approaches are area based and can miss out on significant numbers of Travellers given their greater dispersal. A contrary viewpoint regarding the inclusion health model, noted some concern that experience in other jurisdictions, where this model has been employed, is potentially creating segregated services, and has not had the desired impact for groups such as Roma.

Ambiguity on foot of health sector reforms:

The significant structural reforms underway in the health sector, as a result of Sláintecare introduce further ambiguity into this policy field. The pending formation of six regional health areas was noted in particular, as significantly changing the terrain within which to identify and locate regional/local drivers for policy implementation, and, indeed, the particular actions or processes that might be involved at this level.

Interviewees noted that it was not clear what the fit would be between these new structures and the THUs. It was pointed out that the reforms could introduce new opportunities regarding structures to drive policy implementation, but it was not clear what these might be. The current emphasis on enhanced community care teams and networks was noted as an example that held potential for Travellers but without any clarity as to how such potential might be identified and realised.

Figure 5. provides a synopsis of the key conflict-ambiguity issues that place Traveller health policy implementation in the ‘symbolic implementation’ paradigm.



Symbolic Implementation

The high policy conflict- high ambiguity evidenced above places Traveller health policy in the ‘symbolic implementation’ paradigm. In the previous section of this report, on Traveller accommodation policy, a ‘symbolic implementation’ paradigm was identified for that policy field. As pointed out above in relation to the accommodation policy field, Matland notes that “policies that invoke highly salient symbols often produce high levels of conflict even when policy is vague”. The symbols are sufficient to create opposition.

In this instance, the symbols that are the source of such conflict have not been formally set out, in the absence of a published policy on Traveller health. In this, it differs from the Traveller accommodation policy field. It is clear from the literature review and the interviews, that the symbol at issue remains that of Traveller culture and ethnic identity, the recognition of cultural difference, and an acknowledgement of the practical implications of cultural difference. In this policy field, it is the practical implications of cultural difference that hold the symbolic content and are a focus for contest and ambiguity: mainstreaming as opposed to targeting; and targeting disadvantage as opposed to targeting the practical implications of cultural difference as well as disadvantage.

4.3 IMPLICATIONS

In the previous section, on Traveller accommodation policy, we have outlined the broad implications for policy implementation where a policy area is associated with high conflict and high ambiguity, and the process that is likely to unfold in such a scenario: one of a ‘symbolic implementation’ paradigm. In this scenario, delivery-level ‘coalition strength’ is identified by Matland, as being the key outcome driver. Building ‘coalition strength’ in this health field will usefully involve attention to: enabling the THU as a locus for coalition building; establishing models of intervention from the local level experience; and the strategic contribution required of national level actors.

Coalition sites and structures

The THUs emerge, from the literature review and the interviews, as key outcome drivers and, as such, key sites for local coalition building. This reflects an imperative of subsidiarity in this sector, in particular, in the current direction of reform. It is clear from the interviews that there is a need to underpin the level of influence of the THU, give clarity to the role of the THU and extend its reach if it is to effectively serve as the locus for coalition building.

A number of interviewees emphasised the need for the participation of senior HSE staff with decision-making power on the THUs. They noted the need for such representation from across the various key Community Healthcare Organisation (CHO) area directorates. The model developed by the Eastern Region THU was noted as an exemplar in this regard. It was further noted that the seniority of the THU Coordinator might need to be enhanced to enable influence within each CHO area.

Some interviewees noted concern at a growing clinical role being played by THUs, wherein the THU becomes essentially another service provider, with all the risks of segregation entailed. This emphasis on a clinical role would likely diminish the THUs’ potential as sites for coalition building and reduce their capacity to effectively engage health service decision-makers, mainstream health service providers, and the Traveller community.

The role and contribution of the THUs during the COVID-19 pandemic are noted as holding significant learning from the future. The THU was, over this period, a key effective space for coalition building that made a significant health impact that encompassed a dual approach of targeting and mainstreaming and a social determinant approach. The learning and insights from this period could usefully serve the future of the THUs as the local for coalition building.

Coalition themes

The THUs can serve to model the dual approach of targeting and mainstreaming, ensuring a balance of attention to both, and this needs to be a key theme for local coalition building, within the overarching theme of policy implementation. Interviewees noted that a strong tradition in this regard has been developed by the THUs and needs to be sustained, but is being eroded in the current context of high conflict and high ambiguity. This tradition, it was suggested, was rooted in community development principles and involved a targeting that was designed to secure a better engagement by Travellers with mainstream service provision and a better engagement by mainstream service providers with Travellers.

The THUs can further serve as a model for a social determinants approach to health inequalities experienced by Travellers, another theme for local coalition building. Interviewees noted the implications in regard to the reach of THUs from this emphasis on the need to take a social determinants approach and the imperative of strong partnerships with key agencies for such an approach to be effective. The Local Community Development Committees and the Children and Young People Services Committees are the sites noted for such partnership building, with the Traveller Interagency Groups as a potential Traveller-specific site, though noted as being of varying quality. THU access to and effective engagement with these sites would need to be brokered to secure the necessary reach.

A further theme of importance for local coalitions would be to address the issue of targeting of disadvantage by health services and how such targeting might usefully include Travellers. This would require an engagement with those responsible for the array of core programmes targeting disadvantage, to establish the flexibilities and competencies required to ensure such programmes can address issues of cultural diversity, and racism and discrimination, in a manner to drive improved Traveller health outcomes.

THUs would usefully agree on the design for such models and ensure that they are effectively applied.

This focus on the centrality of the THU directs some attention to the contribution of the NTHAF as the arena in which the THUs come together to coordinate and exchange. Interviewees noted the capacity of the NTHAF to serve as a space to establish and promote a shared model of intervention by the THUs. The need to document the model, develop it as necessary, and demonstrate that it works was pointed to.



National Level Actors

The focus on the centrality of local drivers, in the symbolic policy implementation context, is not to preclude the contribution to be made by national actors in driving policy implementation.

National monitoring was referenced by interviewees as requiring attention, particularly in a context of changing structure and priority under the Sláintecare reforms. Key performance indicators (KPIs) were noted as a key element in this national monitoring and the potential in the current NTHAF working group on KPIs was noted. It was suggested that the indicators on Traveller health in the HSE service plan are weak.

National prompts were noted as holding potential to secure a focus on Travellers in mainstream programmes being delivered at regional/local level. These can be by way of senior-level Departmental or HSE instruction as to prioritising Travellers within the delivery of a broader programme or policy and can be further reinforced with additional or ringfenced funding.

Designated responsibility at national level was further identified as important by interviewees. In particular, senior officials in the Department of Health and the HSE, it was suggested, need to be identified as holding a brief for the dual approach of targeting and mainstreaming regarding Traveller health. It was pointed out that such positions needed to have reach across the full spectrum of both organisations mandates. Such an approach at national level could be matched at CHO level.



“

...the AITHS data presented a potential watershed moment for a renewed impetus to develop an evidence-based policy framework to improve health outcomes for the Traveller community...

”

05



education

Policy Implementation: Traveller Education

5.1 LITERATURE REVIEW

In examining Traveller policy implementation in the field of education, this report focuses on primary-level and post-primary-level education.

The Education Act 1998, sets out the framework under which primary and second-level education is delivered. The Act gives a statutory basis to the role of school Patron, essentially the entity that owns the school. The Act makes some demands of the Patron: for a school to be recognised and to secure funding; to provide a curriculum as determined by the Act; to cooperate with the Inspectorate; and to appoint the school Board of Management.¹⁰¹

The core function of the Board of Management is to manage the school on behalf of the Patron and to do so in accordance with policies determined, from time to time, by the Minister.¹⁰² The Board of Management is required to develop a school plan which is prepared “in accordance with such directions, including directions relating to consultation with the parents, the patron, staff and students of the school, as may be given from time to time by the Minister in relation to school plans.”¹⁰³ The school plan includes the objectives of the school relating to equality of access to and participation in the school and the measures which the school proposes to take to achieve those objectives.

Schools, therefore, are essentially privately owned and managed entities, with funding provided by the State. In this regard, the 1998 Act underscores a partnership approach between the Minister for Education and the “patrons, national associations of parents, parents’ associations in schools, recognised school management organisations, recognised trade unions and staff associations representing teachers and such other persons who have a special interest in or knowledge of matters relating to education”.¹⁰⁴

Responsibility for a policy focus on Traveller education sits with the Social Inclusion Unit, of the Department of Education, which is responsible for developing and promoting a coordinated departmental response to tackling educational disadvantage from pre-school through to second-level education.

The 1995 Report on the Task Force on the Travelling Community contained 167 recommendations in the field of education and training.¹⁰⁵ Also in 1995, the White Paper Charting Our Education Future was published, which put down some key markers in relation to Traveller culture and identity, reflecting a dual mainstreaming and targeted approach to Traveller education, with an emphasis on responding to cultural difference.¹⁰⁶

101 S10 and S14, Education Act 1998. In the case of Roman Catholic Church and Church of Ireland schools, the owners are usually the diocesan trustees. Multi-denominational schools are usually owned by a limited company or board of trustee.

102 S15, Education Act 1998.

103 S21, Education Act 1998.

104 S7.2(b), Education Act 1998.

105 Department of Equality and Law Reform, Report of the Task Force on the Travelling Community, 1995.

106 Department of Education and Science (1995). Charting our Future: White Paper on Education.

The White Paper identified two key policy targets: within five years “all Traveller children of primary school age be enrolled and participate fully in primary education, according to their individual abilities and potential”; and within ten years, “all Traveller children of second-level school-going age would complete the junior cycle and 50 percent will complete the senior cycle”.¹⁰⁷ Achievement of these targets was to be assisted through the continued provision of targeted supports to Traveller children within mainstream provision, such as the visiting teacher service, alongside a focus on Traveller culture in teacher training and “retaining respect and value for (Travellers) distinctive culture”, including modules on Traveller culture in teachers’ pre-service and in-career training.¹⁰⁸

In 2002, the Department of Education and Science published Guidelines on Traveller Education for Primary Schools, which further underpinned this approach.¹⁰⁹ These guidelines pointed to: the role of the resource teacher for Travellers, in supporting colleagues and in providing learning support to Travellers in an integrated setting; opportunities provided in all the subject areas of the curriculum to promote an intercultural approach in the classroom; and the inclusion of an anti-racist, intercultural statement and strategy in the school plan. In the same year the Department published Guidelines on Traveller Education in Second Level Schools which point to: the integration of Travellers in the school community; a whole-school approach to intercultural education; and validation of Traveller culture within the curriculum.

In 2005/6 the National Council for Curriculum and Assessment (NCCA) published intercultural education guidelines for primary and post-primary schools which made specific reference to the cultural identity of the Traveller community.¹¹⁰ The guidelines aimed to provide a context for children and young people to develop intercultural competence in an integrated way throughout their primary and post-primary education.

The next key development in the national policy framework regarding Traveller education, was the Report and Recommendations for a Traveller Education Strategy, published in 2006.¹¹¹ The main impetus cited for the development of the 2006 Strategy was the 1995 Report of the Task Force on the Travelling Community.¹¹²

The 2006 Report includes a set of core values and principles, one of which states, that “The report endorses the inclusion of Travellers in the mainstream education system, in a way that respects Travellers’ cultural identity, including nomadism”.¹¹³ This points to a mainstreaming approach that involves a concern for Traveller culture and identity, with reference made also to the need to address racism and discrimination. A dual approach is suggested with targeting through extra measures envisaged, that “create independence and responsibility and promote interactive and interdependent engagement with the mainstream service”.¹¹⁴

The Department of Education and Science envisaged challenges to implementation of the 2006 Report, noting, that “The education system is a complex one that involves many different stakeholders. Successful implementation of the recommendations will be challenging and will require an openness to change and the full commitment and participation of all the stakeholders”.¹¹⁵

107 *Ibid.* Pages 28 and 61.

108 *Ibid.* Pages 29 and 61.

109 Department of Education and Science (2002). *Guidelines on Traveller Education in Primary Schools*; and Department of Education and Science (2002). *Guidelines on Traveller Education in Second-Level Schools*

110 National Council for Curriculum and Assessment (2005) *Intercultural Education in the Primary School*. National Council for Curriculum and Assessment (2006) *Intercultural Education in the Post-Primary School*.

111 Department of Education and Science (2006). *Report and Recommendations for a Traveller Education Strategy*.

112 *Ibid.* Page 8.

113 *Ibid.* Page 9.

114 *Ibid.* Page 9.

115 *Ibid.* Page 9.

The 2006 Report contains 14 recommendations (with 37 related actions) addressing primary-level education and 17 recommendations (with 53 related actions) addressing post-primary-level education. These recommendations carry through previous policy positions, in reflecting the dual approach of mainstreaming and targeting, with a concern for an intercultural approach addressing Traveller culture and identity and ensuring no discrimination.

At the same time that the 2006 Report was developed, a National Traveller Education Strategy Advisory and Consultative Forum, Chaired by the Social Inclusion Unit in the Department of Education and Science, was established to advise on the implementation of the Report's actions.

In regard to policy implementation structures, the following is noted in the 2006 Report:

- “Two high-level officials, one from the administrative side and one from the Inspectorate, should be designated to co-ordinate Traveller education as part of their work.
- The National Education Officer for Travellers should continue to work in promoting the policies of the Department of Education and Science on Traveller education at all levels, with a particular emphasis on inclusion and integration; collaborate with the Teacher Education Section of the Department of Education and Science on the CPD of teachers; and support the implementation of the recommendations when they are approved.
- The Department of Education and Science Internal Co-ordinating Committee for Traveller Education should be reconvened to oversee the implementation of the recommendations in this report.
- The Advisory Committee on Traveller Education¹¹⁶ should continue to advise the Minister and evaluate the progress of strategy implementation.
- The Department of Education and Science should take a leading role in preparing an implementation plan that will activate the strategy. Such a plan would specify which sections of the department and other organisations would be responsible for implementing the different recommendations. The implementation plan would also examine the cost of implementing the different recommendations.”¹¹⁷

The proposed implementation timelines for the various actions contained in the 2006 Report were short-term (within two years), medium-term (three to five years) and long-term (five years plus). While a review of the implementation of the Report's actions was proposed, at the end of the fourth year of implementation, no such review was undertaken.



116 The Advisory Committee on Traveller Education was established on foot of a recommendation of the 1995 Task Force Report. It included representation from Traveller organisations and was involved in the development of the 2006 Report.

117 Ibid. Page 98.

Traveller organisations have been critical of the lack of implementation of the 2006 Report’s recommendations and have called for a comprehensive review of the Report and for the development of a new Traveller education strategy.¹¹⁸ In March 2020, the Department of Education and Skills advised that a desk review of the 2006 Report had been completed, in giving effect to the commitment in the NTRIS for such a review to be completed in 2017, and that a report of the review was being prepared for publication.¹¹⁹ To date, however, this review report has not been published.

Currently, Traveller education policy is primarily based on the commitments contained in the National Traveller and Roma Inclusion Strategy (NTRIS), which contains twenty-four actions in the area of education. These include a commitment to review the Report and Recommendations for a Traveller Education Strategy and publish this report by early 2017.¹²⁰ Unlike in the area of health, the NTRIS does not commit to the development of a targeted Traveller education policy. The current Programme for Government, however, does contain such a commitment.¹²¹

A dual approach of mainstreaming and targeting, while not specifically named as such, is evident in the NTRIS commitments in the area of education focused at primary and secondary-level:

- Commitments are made in relation to mainstreaming, that specifically reference:
 - reviewing schools’ admissions policy and enrolment procedures, and anti-bullying procedures and guidelines, and
 - building teacher capacity regarding the concept of inclusive education, and addressing racism and increasing cultural awareness, through initial teacher training and continuous professional development.
- Commitments are made in relation to targeting, that specifically reference:
 - specific interventions to support Traveller access, participation and engagement in education,
 - positive action to support Travellers to train as teachers, and
 - funding for Traveller organisations to implement community-based supports to improve Traveller retention in education.

A NTRIS education sub-committee was established, primarily to advance action 17 which relates to the Department of Justice and Equality funded initiative to resource Traveller community groups to implement community-based supports to assist the retention of Traveller and Roma in the education system.¹²²

In response to actions 17 and 10¹²³ of NTRIS, four pilot education initiatives are currently being implemented, ‘Supporting Traveller and Roma (STAR)’. The STAR pilot initiatives have five priority goals that encompass a focus on: improving the learning experiences and outcomes for Traveller and Roma; improving parental engagement with the school community and fostering an appreciation of education; improving educational outcomes (attendance, participation, and retention); developing and promoting community linkages; and gathering accurate data on and learning from the pilots, to inform national policy.¹²⁴

118 European Commission, *DG Justice and Consumers (2020)*. *Op cit*.

119 Department of Education and Skills update to NTRIS, March 2020.

120 Department of Justice and Equality. 2017. *Op cit*. Page 25.

121 2020 Programme for Government: *Our Shared Future*. Page 100.

122 European Commission, *DG Justice and Consumers (2020)*. *Op cit*. Page 32.

123 Action 10 commits the Department of Education and Skills, the Department of Children and Youth Affairs and Tusla, to “develop proactive, early intervention education welfare supports to promote and support Traveller and Roma attendance, participation and engagement with the education system and retention to the Leaving Certificate or equivalent”.

124 NTRIS (June 2019). *Traveller and Roma Education Pilots: Operational Guidance Document*.

Each initiative has a local steering committee and there is a national pilot oversight group reporting to the NTRIS education sub-committee. Each pilot area is provided with a staff team, comprising: an Educational Welfare Officer, provided by Tusla Educational Welfare Services; a Home School Community Liaison Coordinator, funded by the Department of Education; and two Traveller/Roma Education Workers drawn from the local communities and funded by the Department of Justice and Equality.

Two key themes of relevance for policy implementation, emerge from the literature review. The first relates to the balance between mainstreaming and targeting in the dual approach put forward in the policy documents examined. The second relates to the meaning of mainstreaming and the concept of integration.

Turning firstly to the **balance between mainstreaming and targeting**, the 2006 Report emphasises that, while a targeted approach is justified, ultimately the goal must be to ensure equality of access, participation and outcome, through mainstream education policy and provision. This ultimate goal of an integrated approach to Traveller education within mainstream provision, is further elaborated on in the Report of the High Level Group, which notes that “one of the core issues it (the 2006 Report) is addressing relates to how existing targeted educational supports for Traveller children might best be integrated, on a phased basis, into an enhanced mainstream provision”.¹²⁵

The Departmental anti-bullying procedures for schools were published in 2013, and reflect an exemplar of this mainstreaming approach that does not include for an accompanying targeted approach. The procedures include, in their definition of bullying: “identity-based bullying such as... racist bullying, bullying based on a person’s membership of the Traveller community”.¹²⁶ 2022 research, commissioned by the Department of Education, on the effectiveness of the anti-bullying procedures for Travellers and Roma, reveal issues in such an approach.¹²⁷ The research found that, of the 123 schools that replied to the research survey: 45% said that their anti-bullying policy did not specifically reference bullying to include on the basis of being a Traveller, despite the Departmental procedures advising they should; 44% said they did not record incidents of identity-based bullying related to Traveller identity; and 69% said that their school had no evidence regarding the prevalence of identity-based bullying against Traveller students.¹²⁸

The anti-bullying procedures, in taking this mainstreaming approach, are silent on the need for additional measures to specifically address issues of racism, and the conflation of these two phenomena appears to suggest that a blanket school response, to both issues, is sufficient. The result has clearly been that, schools’ anti-bullying policies have been insufficiently robust to function as anti-racism policies. In addition, conflating bullying and racism in this way ignores the structural element to racism, including that perpetrated through the systems and practices of the school itself.

In 2012, in a presentation to a workshop of national Traveller policy committees, an official from the Department of Education and Skills emphasised the ‘mainstreaming to ensure integration’ approach of the 2006 Report. The report of the workshop notes that the Department official advised that “Mainstreaming has necessarily involved removing specific Traveller pupil supports” and that “replacement mechanisms for ensuring improved Traveller integration need further exploration as there are outstanding issues to be addressed”.¹²⁹

125 Report of the High Level Group on Traveller Issues (2006). *Op cit.* Page 39.

126 Department of Education and Skills (September 2013). *Anti-Bullying Procedures for Primary and Post-primary Schools.* Page 8.

127 Dupont, M. (2022). *A Study into the Effectiveness of the Anti-Bullying Procedures on Traveller and Roma Pupils' Experiences in the School System.* Dublin City University Anti-Bullying Centre.

128 *Ibid.* Pages 45 and 46.

129 McCarthy, O. (2012). *Op cit.* Page 10.

to help others with new skills	LITTLE BIT Experience in area	INCREASE Learning	Time
To advance new skills	EXPERIENCE	NEW SKILLS	ASSIGN
Further Skills	YOUTH	Learning	Time
New opportunities	experience	New skills further education	time Not finished the course
Travellers + Roma Feel SAFE	CONFIDENCE LIFE Learning	INCREASE Learning for people who are coming	Time
Advance Skills	EXPERIENCE	KNOWLEDGE	
new challenge improving skills to finish	work absent from people. Experience.	i hope to have a to finish a course in mainstream school	

This appears to suggest that Traveller educational inequalities, barring some “outstanding issues”, were being sufficiently addressed to the point where targeted supports could be removed. However, the “outstanding issues” noted by the Departmental official were significant in scale: attendance, participation and retention of Traveller students; literacy levels; supporting Travellers in non-DEIS schools;¹³⁰ and engaging Traveller parents. Census data at the time, 2011, indicate a significant underachievement of the 1995 White Paper ten-year targets, set sixteen years earlier. As previously noted, these targets aimed for all Traveller children of second-level school-going age to complete the junior cycle and for 50% to complete the senior cycle, by 2005. Census data, however, show that in 2011: 23% of Travellers aged 15 to 24 years had ceased their education at primary level or had no formal schooling; only 21% of Travellers aged 15 to 24 years had completed lower second-level education; and only 5.5% aged 20 to 24 years had completed upper secondary level.¹³¹

It might well be considered that the outstanding issues identified by the Department of Education and Skills, taken together with these Census data on poor education completion rates, would have necessitated some continuation of existing targeted education measures for Traveller children. The previous year, however, in Budget 2011, the targeted educational resources for Traveller students were cut by 86%.¹³² A recent report commissioned by the Department of Education indicates that these cuts, in particular the removal of the Visiting Teacher Service for Travellers, have made it more difficult for some schools to retain Traveller students.¹³³

The removal of key targeted educational supports together with the Department’s emphasis on ‘mainstreaming to ensure integration’ suggest that the policy approach of mainstreaming supported by targeted measures, was set aside, with the emphasis placed on mainstreaming.

In a 2019 written response to a parliamentary question on whether the 2011 cuts to targeted educational resources for Travellers would be reversed, the then Minister for Education and Skills justified the decision to make these cuts as part of the Department’s overall policy approach to integration, noting that “A key objective of Traveller education policy in recent years has been the phasing out of segregated provision and the inclusion of Traveller children and young people in mainstream education.”¹³⁴

This suggests some confusion between targeting and segregation. Segregation has been at issue in Traveller education, and continues to be an unacceptable feature of such provision. The 1963 Report of the Commission on Itinerancy advocated a segregationist approach to the education of Traveller children, recommending special schools for Travellers living in larger Traveller-specific accommodation sites, and, while it was recommended that Travellers living in standard housing attend mainstream schools, separate classes and a different curriculum were recommended for them.¹³⁵

130 Approximately 50% of Traveller students attend schools that are outside of the DEIS Programme.

131 Census 2011. Profile 7 Religion, Ethnicity and Irish Travellers- ethnic and cultural background in Ireland. Statistical Tables and Appendices. Page 66. Central Statistics Office.

132 Harvey, B. (April 2013). Travelling with Austerity: Impacts of cuts on Travellers, Traveller projects and services. Pavee Point Traveller and Roma Centre.

133 Quinlan, M. (2021). Out of the Shadows: Traveller and Roma Education, Voices from the Community. Department of Education and Skills. Page 46.

134 Tuesday 2, April 2019. Written response to PQ 168. Minister for Education and Skills, Joe McHugh T.D.

135 Report of the High Level Group on Traveller Issues (2006). Op cit. Page 67.

Subsequently, national policy moved from a segregationist approach, to one of integration of Traveller children within mainstream education provision.¹³⁶ While the policy approach had positively evolved from segregation to integration, practice had been slower in response and special schools and special classes for Traveller children in mainstream provision continued for some time.¹³⁷

In addition, when Traveller children began to attend mainstream schools, a more hidden form of segregation was identified, by the Department of Education and Science Inspectorate: “Anecdotal evidence suggests that some schools either discourage or obstruct the enrolment of Traveller children. In fact, many principals and visiting teachers for Travellers claimed that certain schools in their locality did not facilitate the enrolment of Travellers, and, as a result, disproportionate numbers of Traveller students were attending those schools where Travellers were made to feel welcome”.¹³⁸ In more recent times, yet another form of segregation has emerged, in the form of the practice of reduced timetables (school hours). This practice is reported as being disproportionately applied to Traveller students and becoming more commonplace.¹³⁹

A recent report commissioned by the Department of Education, to provide baseline information to inform the NTRIS schools STAR pilot initiative,¹⁴⁰ also points to some confusion, this time at the school-level in relation to the balance between mainstreaming and targeting and the purpose of targeting.¹⁴¹ The report identifies that school staff “highlight what they feel are the potentially conflicting requirements of integration and inclusion of students from the Travelling community on the one hand, and issues of providing an alternative or specialist curriculum and daily structure that would better meet their perceived needs on the other.”¹⁴² The report notes, by way of example, a school which identifies that “shorter courses, practical subjects which have more relevance for the Traveller students, and shorter days are what the Travelling community in the area would like to see offered. However, there is a perception that this approach would be rejected by both the DES and Traveller organisations”.¹⁴³

Targeting without mainstreaming can become a form of segregation, however, targeting is an important element in enabling effective and appropriate mainstreaming and the two should not be confused. The education inequality gap between Travellers and non-Travellers remains significant and in such a context targeting is needed to secure mainstream outcomes. The ESRI, in their 2017 report on the situation and experience of Travellers, concluded that “The depth of educational disadvantage experienced by Travellers means that specific, targeted additional supports will be required in order for them to participate in mainstream education on equal terms.”¹⁴⁴

Turning to the second key theme that emerges from the literature review, that of **the understanding of mainstreaming**, it is clear that there are issues at play in the different understandings of ‘integration’.

136 *Report of the Travelling People Review Body (1983); Report of the Task Force on the Travelling Community (1995); Department of Education and Science (2002). Guidelines on Traveller Education in Primary and Second-Level Schools.*

137 *The 2006 Report of the High Level Group on Traveller Issues, noted 48 Traveller pre-schools still in operation at that time.*

138 *Department of Education and Science (2005). Survey of Traveller Education Provision. Inspectorate of the Department of Education and Science. Page 71.*

139 *Houses of the Oireachtas, Joint Committee on Education and Skills: Report on the Committee's Examination on Progression of Travellers from Primary, to Secondary, and Third-Level Education (May 2019). This Report recommended that the Department of Education and Skills or Tusla collect data on the practice and develop a Statement Strategy for School Attendance and mandatory controls for Schools.*

140 *As part of the NTRIS education actions, a two-year Pilot Programme has been established to target school attendance, participation and retention for Travellers and Roma, in 55 schools in four regions of the country. Each pilot area was provided with additional education resources. Partners in the project include: Tusla Education Support Services, Department of Education and Skills, Department of Children, Disability, Equality, Integration and Youth, Traveller and Roma representative bodies and Communities.*

141 Quinlan, M. (2021). *Op cit.*

142 *Ibid. Page 44.*

143 *Ibid. Page 44.*

144 *Watson et al. (2017). Op cit. Page 75.*

It is noteworthy that, references to an intercultural approach in the education commitments in the NTRIS, are limited.¹⁴⁵ There is some focus on issues of culture and racism, in relation to the Stay Safe Programme, Continued Professional Development for Teachers, and the work of the Teaching Council in Initial Teacher Education Programmes. The concept of ‘inclusive education’ is referenced but not defined. There is little focus on school provision or school systems.

In its 2019 curriculum audit for its work on Traveller culture and history, the NCCA noted that the “(intercultural) guidelines at both primary and post-primary levels never became an intrinsic element of a broader strategy and no mentoring mechanisms were put in place for their full implementation”.¹⁴⁶ The intercultural dimension at the level of policy implementation within schools did not, therefore, appear to be of substance.

The Department has advised that the review undertaken of the 2006 Report concluded that, largely, the Report’s recommendations have been addressed, through the mainstreaming measures that address educational disadvantage more broadly, in particular through the DEIS Programme and through other teaching supports provided at non-DEIS schools.¹⁴⁷ This would appear to emphasise a concern for disadvantage without the emphasis on cultural difference. The integration challenge is posed in terms of poverty and social exclusion, rather than in terms of intercultural provision.

This understanding of mainstreaming was reiterated by the Department of Education, at an Oireachtas briefing in 2021, when a Department Official advised that segregated Traveller provision had been phased out with funding “incorporated into overall school and other funding streams, in order to provide supports for Traveller pupils in mainstream schools”, through the mainstream supports available as part of DEIS Programme provision, and, in non-DEIS schools, through other mainstream supports such as special education teachers, special needs assistants and supports provided by the National Educational Psychological service.¹⁴⁸ The Department further advised that “The Department supports inclusive education for all and actions that will ensure that the school setting is a more welcoming environment for all our students, including Travellers.”¹⁴⁹ This picks up the theme of inclusive education referenced in the NTRIS and appears to locate it in terms of disadvantage and of poverty and social exclusion.

On the other hand, the progression of the Traveller Culture and History in Education Bill, and current work of the NCCA on Traveller culture and history in the curriculum, does point to an ongoing focus on the intercultural dimension. One important aspect of intercultural education is ensuring a focus on Traveller history and culture in the school curriculum. In 2019, the NCCA published an audit of Traveller culture and history in the curriculum.¹⁵⁰ The purpose of the audit was to identify current opportunities, across the early childhood, primary and post-primary curricula, for children and young people to encounter and learn about aspects of Traveller culture and history and to identify future possibilities in this regard.

The NCCA audit notes that it is “widely acknowledged that there is limited understanding among the general population, including among educators, about Traveller culture and history.” As a result, it is noted, “for some students from the Traveller community, the dissonance between the social, linguistic and cultural environments of the home and school can become a source of disaffection and disengagement. A complex additional issue is the unconscious or conscious bias which impacts on children’s understanding of Travellers, either through their home, school or community environment.”¹⁵¹

145 Department of Justice and Equality (2017) *Op. cit.* Pages 25-26.

146 NCCA (2019). *Traveller Culture and History in the Curriculum: A Curriculum Audit.* Page 28.

147 Department of Education and Skills update to NTRIS, March 2020.

148 Opening Statement to the Joint Oireachtas Committee on Key Issues Affecting the Traveller Community. November 18, 2021. Mary Cregg, Principal Officer, Department of Education.

149 *Ibid.*

150 NCCA (2019). *Op. cit.*

151 *Ibid.* Page 128.

A significant challenge, identified by the NCCA in their audit, was the difficulty in identifying schools or early childhood education settings that provide learning and teaching opportunities to develop children’s knowledge and understanding of Traveller culture and history in the wider context of intercultural education.¹⁵² While relevant education policy documents were readily identified and audited, instances of developed approaches and practices in schools and early childhood settings proved difficult to source. The audit identifies key drivers for securing such a focus: the Inspectorate, in advancing and advocating for a whole-school approach to intercultural education; the State Examinations Commission, in the assessment items, materials and examples it uses; and support services such as the Professional Development Service for Teachers and professional bodies such as the Teaching Council.

Promoting a schools’ focus on Traveller culture and history is, however, only one side of the intercultural education coin. Intercultural education must also include a focus on addressing racism and discrimination at the individual and institutional level. This dual focus of respecting and celebrating diversity, and addressing racism and discrimination is identified as the core of intercultural education, in the NCCA intercultural guidance for schools.¹⁵³

Criticisms have been made, however, of schools failing to adequately address issues of racism as a necessary component of an intercultural education approach. Kavanagh, in her analysis of intercultural education in Irish primary schools, notes in this regard that “teachers reasoned that (children) learning about other cultures would eradicate ignorance, which would in turn eliminate prejudice and racism”, there is, she notes “little support for this hypothesis”.¹⁵⁴ Kavanagh’s research also exposed teaching staff’s own racist viewpoints as well as their lack of understanding about racism: tending to exclusively view racism as being about individual acts, with little understanding of issues of structural racism in schools practices and processes; and failing to understand specific incidents as racist, such as settled parents requesting that their child would not be put sitting beside a Traveller child.¹⁵⁵

The Irish Traveller Movement, through their intercultural education Yellow Flag Programme, has also raised concerns that there is insufficient focus on addressing racism in the school setting.¹⁵⁶ In a report to the Oireachtas, the Irish Traveller Movement advised that “reports of discrimination in education settings are still evident to us, ranging from name-calling, to physical assault, social exclusion and institutional practices that reduce Traveller student timetables or segregate them from other students”, and that “Mandatory anti-racist and intercultural training or continuous professional development for teaching staff has been proposed in a number of statutory policies, but is still not available in practice.”¹⁵⁷

In regard to third-level education, there have been positive developments that are instructive, namely: the Programme for Access to Higher Education funding stream, to increase Traveller participation in higher education; the Action Plan for Increasing Traveller participation in Higher Education 2019-2021, with targets to increase the number of Travellers accessing higher education, albeit modest. In March 2021, the Minister for Further and Higher Education, Research, Innovation and Science announced that funding to assist Travellers and Roma to access higher education, including the provision of bursaries, would be increased by 50%, to €0.45m.

152 *Ibid.* Page 133.

153 *National Council for Curriculum and Assessment (2005). Op cit.*

154 Kavanagh, A. M. (2013). *Emerging Models of Intercultural Education in Irish Primary Schools: A critical case study analysis. Thesis submitted for a Doctorate of Philosophy. St Patrick’s College, DCU. Page 148.*

155 *Ibid.* Pages 192 and 207.

156 *The Yellow Flag is an eight-step intercultural education programme for primary and second-level schools.*

157 *Opening Statement to the Joint Oireachtas Committee on Education and Skills: Elva O’Callaghan, Yellow Flag Programme Coordinator, Irish Traveller movement. March 26, 2019.*

5.2 TRAVELLER EDUCATION POLICY: APPLYING THE AMBIGUITY-CONFLICT MODEL

In this section we apply Matland's ambiguity-conflict model to the field of Traveller education policy. Firstly, we establish the level of policy conflict and policy ambiguity associated with the implementation of Traveller education policy (summed up in Figure 6.). Secondly, we identify the implications of this analysis in regard to the policy implementation process. In conclusion, we set out considerations for a more effective implementation of Traveller education policy.

Policy Conflict

On the low-to-high policy conflict continuum, Traveller education policy is one of high policy conflict. The review of the literature and the interviews with stakeholders present evidence of two areas of conflict, each relating to policy means:

- divergent stakeholder views regarding the level of emphasis that should be placed on mainstreaming and/or on targeting as the most appropriate approach to addressing Traveller education inequalities; and
- divergent stakeholder views regarding the level of authority the Department of Education has/should have in driving policy implementation at the school level.

Each of these two areas is briefly examined below.

Targeting versus mainstreaming:

A dual approach, interlinking targeting and mainstreaming, is evident in the following:

- Charting Our Education Future, White Paper, 1995.
- Report and Recommendations for a Traveller Education Strategy of the Department of Education and Science, 2006.
- The National Traveller and Roma Integration Strategy 2017-2021.

The Department of Education, in recent and current positions, has reiterated its emphasis on mainstreaming, in terms of integration and the imperative of eliminating any segregation. This direction of policy travel is, as outlined in the literature review, viewed as a move away from segregationist approaches to the teaching of Traveller children. This emphasis on mainstreaming over targeting is further reflected in the points put forward by a number of interviewees.

In practice, this emphasis can be seen to have involved actual change in the balance between investment in mainstreaming and in targeting, with a stripping back of targeted supports for Traveller participation in education. This was noted in particular over the period of economic and financial crisis and specifically in Budget 2011. This emphasis on mainstreaming over targeting can also be seen in relation to the Department of Education's anti-bullying procedures, where a mainstreaming approach to tackling racist bullying, without any associated targeting of the issue taken. As a result, 2022 research, as previously noted, points to inadequate attention afforded to racist incidents experienced by Traveller in the school setting.

A number of interviewees pointed to the entrenched education equality gap between Travellers and non-Travellers as signalling a requirement for a specific national policy approach that includes significant levels of targeted supports. In the absence of such targeting, it was noted, the desired outcomes from mainstream provision will not be realised. As previously noted, this view is supported by the ESRI in their 2017 report, a Social Portrait of Travellers in Ireland.

One interviewee suggested that the Department was not interrogating their own data, given the use of an ethnic identifier in school enrolment, on Traveller school admission and completion rates, to determine the education outcomes for Travellers in different areas and to set targets as might then be required in this regard. This, it was argued, undermines a mainstreaming only approach and counters any notion that such an approach is going to be effective in addressing Traveller education inequality.

Some interviewees noted a contradiction to this approach in the targeted nature of the NTRIS STAR education pilot initiatives. The pilot initiatives were viewed as holding a potential to put the need for targeting back on the policy agenda and to model an appropriate approach to targeting that was not segregationist and that could underpin and enable a more effective mainstreaming.

The level of authority the Department of Education has/should have in driving policy implementation:

this issue rests on the Education Act 1998 and its interpretation and implementation. This underpins a viewpoint, articulated by interviewees, that schools are largely independent entities, being privately owned and publicly funded.

The scale of the education delivery system, in terms of the numbers of individual schools, was such, some interviewees observed, that a prescriptive approach would not be feasible. While there might be centralised funding, the system is underpinned by local autonomy and is not based on the achievement of targets. The limited resources available for the Department's sections concerned with social inclusion were also noted by other interviewees as a factor in such a hands-off approach.

The inspectorate was identified, by a number of interviewees, as holding some potential authority at the school level. The Inspectorate was noted as working to a quality framework and being improvement-focused rather than compliance-focused. Linked to this, interviewees pointed to the school evaluation process as a means of driving change at the level of the school. However, some interviewees suggested that the processes and tools of the inspectorate had yet to adequately incorporate and address Travellers and Traveller issues at school level.

Other interviewees, noted a more complex relationship between the national and the local, suggesting a fear on the part of the Department to intrude into matters deemed the domain of the school and its Board of Management. Interviewees suggested that any possible progress hinges on the school principal and whether s/he is committed to driving change in this area. In the NTRIS STAR education pilot initiatives, by way of example, it was suggested, the Department plays a role of taking feedback from schools rather than using the spaces provided by the pilot initiatives to take a more directive approach in relation to Traveller education. The lack of any onus on schools involved in these pilots to deliver specific targets in relation to Traveller pupil retention and parental engagement is noted as a further example of this.



Some interviewees noted that the Department has demonstrated an authority to drive policy implementation at school level in other areas, such as the anti-bullying policy, suggesting that a similar authority could be exercised in relation to Traveller education. It was pointed out that Departmental circulars are adhered to, linking school practice to Departmental policy, and could usefully be deployed. It was queried by these interviewees as to whether this was, therefore, a matter of prioritisation, pointing to the limited resourcing of the sections in the Department responsible for social inclusion and equality as further evidence of such lack of prioritisation.

Some interviewees pointed to the absence of a national policy on Traveller education as limiting any authority that could be exercised by the Department of Education. Authority can only be exercised if a clear direction of travel has been established. There was the further suggestion that any such policy would need to be explicit about naming the role for key education actors, the specific actions/targets they are going to have responsibility for, and the authority they can exercise in securing their implementation/achievement.

Policy Ambiguity

On the low-to-high policy ambiguity continuum, Traveller education policy is one of high policy ambiguity. The review of the literature and the interviews with stakeholders present evidence of three areas of policy ambiguity:

- ambiguity in regard to policy goals, objectives and approaches, in the absence of a national Traveller education policy;
- ambiguity in regard to the concept of inclusion or integration, and emphasising the focus on disadvantage rather than a focus that also includes for cultural difference and its practical implications as a further imperative; and
- ambiguity in regard to the concept of intercultural education and the combining of the focus on history and culture with the focus on addressing racism and discrimination at the individual and institutional levels.

Each of these three areas is briefly examined below.

Ambiguity in regard to policy goals, objectives and approaches:

ambiguity exists in the absence of a national Traveller education policy, and as such, underpin the other areas of ambiguity identified and addressed below. Interviewees emphasised the imperative for a national Traveller education policy to: address the significant educational inequalities that persist; give direction and drive action at the school level, and ensure consistency in this regard; and enable a focus and action, beyond the individual pupil, on the structural and systemic issues that pertain regarding educational inequality for Travellers.

From the perspectives presented by some interviewees, there did not appear to be any energy for, or expectation of an early move in implementing the commitment in the current Programme for Government for a targeted Traveller education policy. It was noted, by way of explanation, that COVID-19 had introduced unprecedented levels of upheaval for the education system. However, some interviewees pointed to issues of prioritisation and emphasised that there was an imperative to now fill this policy vacuum.

Ambiguity in regard to emphasising a focus on disadvantage rather than a focus that also includes cultural diversity and its practical implications as a further imperative:

the literature review points to this ambiguity in the arguments put forward by the Department of Education in justifying cutbacks to targeted provision for Travellers. It was suggested that the current range of supports targeting poverty and social exclusion are sufficient to achieve access, participation, and outcomes for Travellers in mainstream provision. Some interviewees emphasised the level of need as the key driver for prioritisation and investment of resources, the greater the level of need is where the greatest level of support should be provided. This points to a disadvantage-led response.

The education supports provided to address disadvantage, through the DEIS programme and through other non-DEIS supports to schools, were identified, by some interviewees, as largely sufficient to address Traveller education inequalities. One interviewee noted that additional resources are provided to schools on the basis of need, in regard to disadvantage, not on the basis of ethnic identity, and that decisions are made at school level regarding how these resources are applied.

Many interviewees however, emphasised that policy approaches designed to address disadvantage, such as the DEIS Programme, are not sufficient to achieve change in the situation and experience of Travellers. These interviewees noted an imperative for policy approaches to simultaneously address issues arising from cultural diversity and its practical implications. They articulated a concern that the current approach to educational inequality was purely material deprivation focused and, as such, was not addressing the full complexity of barriers Travellers experience.

One interviewee observed that schools could claim to have good retention and participation rates for Traveller students, however, retention and completion rates can mask the reality of what it can cost Traveller children to get through their schooling in a context where schools are failing to address issues such as racism. It was noted, for example, that at the same time such schools are lauding their good retention rates for Travellers, they are also observing, seemingly without critique, that many of their Traveller students hide their ethnic identity in an effort to avoid negative treatment, abuse, harassment and social exclusion while attending school.

A number of interviewees stressed that a policy approach that fails to affirm culture and identity and to address negative treatment on the basis of cultural diversity, will have limited success in addressing the needs of the Traveller community. In particular, they noted a very limited understanding of Traveller culture within schools, even in those schools with a large number of Travellers.

Ambiguity in regard to intercultural education requiring a dual focus on cultural difference and anti-racism:

the literature review identifies that the current focus on intercultural education centers on Traveller culture and history in the school curriculum. There is no parallel focus on addressing issues of individual and systemic racism and discrimination. The Departmental anti-bullying procedures, as noted above, do make reference to 'racist bullying', however, only at the level of the individual rather than the institution, and their effectiveness, as previously noted, has been brought into question even at the level of addressing issues at the individual level.

A number of interviewees raised this as an issue, identifying three facets: a lack of understanding among stakeholders about the specific Traveller experience of racism; a lack of understanding of, or appetite to examine, the systemic dimensions of racism; and an unwillingness among stakeholders to address issues of racism in regard to Travellers.

Interviewees suggested that schools exhibit a lack of understanding about the specificity of racist abuse/harassment experienced by Travellers. They noted a conflation of bullying with racist abuse or actions, and as such an erroneous belief that an anti-bullying policy is sufficient to address racist

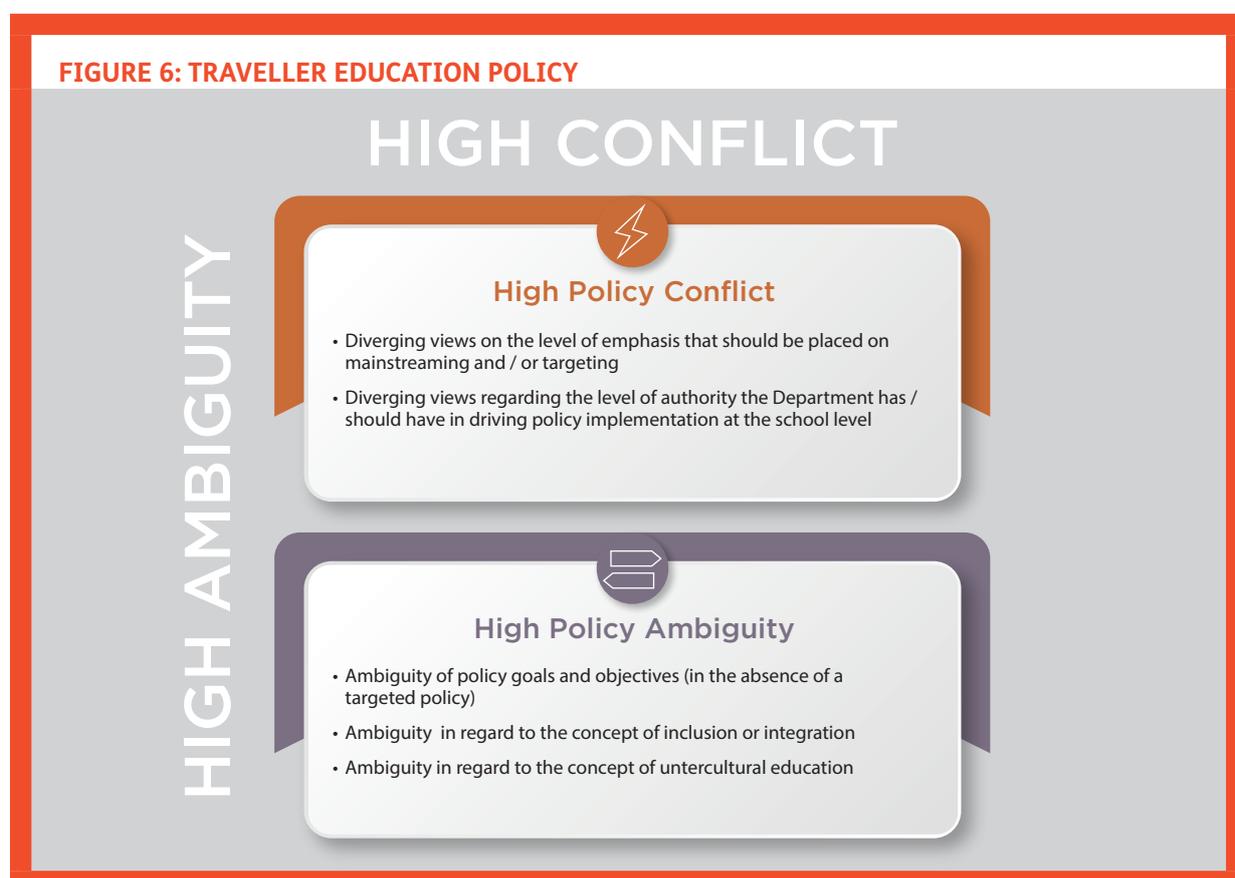
incidents between students. In particular, they noted a lack of understanding in regard to less visible forms of racism, such as micro aggressions, and the impact of these on Traveller children.

Some interviewees noted that schools can be excellent at addressing specific problems experienced by individual children, but that they often have a blind spot when it comes to structural issues, including schools' systems and teaching practice. This results in little acceptance of the need for Traveller intercultural training for school staff, or for the need for robust policies and procedures on issues such as racism, both individual and institutional. It was pointed out by one interviewee that a robust Traveller education policy would involve acknowledgement of the issue of racism, not solely between students but also in regard to racism by teachers and within the education system, and steps to address this effectively.

Another interviewee noted that the problematic framing of Travellers and Traveller culture is deeply embedded in Irish people's thinking, which, consciously or unconsciously, those who work within the school community are not immune from. In this regard, it was noted by a number of interviewees that the education system appears willing to address issues of racism for 'new communities' but does not show a similar willingness when it comes to the Traveller community.

A number of interviewees suggested that this reluctance, by the Department of Education and schools, to name and address issues of racism as experienced by Travellers, was due to a number of factors: fear of drawing criticism; fear of getting things wrong; reluctance to admit that racism exists in their schools; a limited of understanding about who experiences racism (it only relates to people of colour and/or 'new communities'); and a limited focus on individual incidents without a parallel acknowledgement of systemic racism in the education system and its various institutions.

Figure 6. provides a synopsis of the key conflict-ambiguity issues that place Traveller education policy implementation in the 'symbolic implementation' paradigm.



Symbolic Implementation

The high policy conflict – high ambiguity situation evidenced above places Traveller education policy in the ‘symbolic implementation’ paradigm. This ‘symbolic implementation’ paradigm was identified above for both the accommodation and the health policy fields. As previously noted, Matland argues that “policies that invoke highly salient symbols often produce high levels of conflict even when policy is vague”. The symbols are sufficient to create opposition.

In this instance, in the absence of a Traveller education policy the symbol that is the source of such conflict has not been given current policy expression. However, it is evident in the 1995 White Paper, the 2006 Report and Recommendations for a Traveller Education Strategy, and the 2017 National Traveller and Roma Inclusion Strategy. As with the other policy fields, the symbol relates to cultural difference and involves recognition of the distinct culture and identity of the Traveller community and acknowledgement of the practical implications of this.

Unlike the accommodation policy field, however, the symbol has been drained of much of its force with the passage of time and the absence of a current Traveller education policy to articulate it. As such, the focus for contest and ambiguity has become, as in the field of health policy, the practical implications of cultural difference: mainstreaming as opposed to targeting and the balance between two; and targeting disadvantage as opposed to targeting the practical implications of cultural difference as well as disadvantage.

5.3 IMPLICATIONS

In the previous sections we have outlined the broad implications for policy implementation where a policy area is associated with high conflict and high ambiguity, and the context of a ‘symbolic implementation’ paradigm. In this context, delivery-level ‘coalition strength’ is identified by Matland, as being the key policy outcome driver. In this instance, of education policy, building ‘coalition strength’ will usefully involve attention to the following: establishing a locus for such coalition building; establishing models of intervention from the local level experience; and mobilising the strategic contribution required of national-level actors.

Coalition Sites and Structures

There is no immediately apparent locus for coalition building to progress policy implementation in the education field. It is clear, from the literature review and stakeholder interviews, that a diversity of such spaces will need to emerge, reflective of local circumstances and opportunities.

Spaces identified as holding some potential in this regard encompass:

- structures created by local Traveller organisations and their allies;
- the STAR education pilot initiative structures;
- Traveller Interagency Groups (TIGs) education subgroups;
- Children and Young People’s Services Committee (CYPSC) initiatives; and
- developments around Education and Training Boards (ETBs) given their responsibilities for a number of schools at local level.

Such spaces would serve to convene coalitions of key stakeholders working as allies to progress change at local level in the education sector, including allies from within the formal education sector, in particular school principals. Their role would include, to identify the change needed in schools to improve Traveller education outcomes, and to shape and coordinate action on the change that is deemed necessary and can be implemented at local level. These spaces could demonstrate the benefit of doing things differently and provide the models to be adopted at national level to drive further and wider change nationally. Such spaces require resources to coordinate and drive their work, and to make action by busy people doable.

Traveller organisations could, if adequately resourced, offer a hub around which to create and operationalise such spaces. There are emerging exemplars noted by interviewees in this regard where Traveller organisations have convened groups of allies in the field of education and where they have secured resources to employ personnel for this work.

There is an infrastructure of staffing and steering groups established for the STAR pilot education initiatives that holds potential in offering such spaces, as and if the pilots are replicated around the country. It was noted that this infrastructure would only be fit for this purpose if the current approach could evolve to secure a sustained engagement from school leadership and to broaden the focus beyond the individual pupil to the school systems and the wider institution.

Traveller Interagency Groups are noted as having a mixed track record across the country, but they could offer an interagency space with some potential for initiative in the education field. Examples of TIGs establishing subgroups to develop a focus on education were noted. It was suggested that, with the right membership and an appropriate mandate, backed up with resources, there is potential in the TIG infrastructure to have some authority within schools. The CYPSC infrastructure was noted as holding a similar potential, in particular due to its interactions with schools.

ETBs were noted as new players in the education field, with a strong focus on community engagement and a mandate in the formal education sector, alongside linkages and relationships that could enable them to provide a hub around which to develop and implement new models of practice for Traveller education.

A further suggestion noted by interviewees, was the need to develop a local coalition or partnership involving the: Home School Liaison Officer; Traveller Education Worker; Education Welfare Officer; local youth service; local Traveller organisation; and Tusla School Completion Programme. Such an infrastructure, it was noted, would hold potential in bringing disparate education support services together to maximise their impact.

Coalition themes

Within the core theme for local coalitions to secure policy implementation, further themes could be pursued to enable the development of new models of intervention at local level, through these new spaces. Such models could seek to address identified areas of policy conflict and bring clarity where there is ambiguity, and could serve to inform national policy.

The models identified through the literature review and stakeholder interviews as holding some priority in this regard, include:

- Intercultural practice at the level of the school that encompasses visibility for Traveller culture and identity in the curriculum and in school systems, alongside a concern to address and eliminate racism and discrimination at the individual and institutional levels.

- A model of interlinked mainstreaming and targeting, ensuring a balance of attention to both, where Travellers are included in mainstream provision through action to adapt mainstream provision to take account of the practical implications of cultural diversity, alongside action to target Travellers in order to address the specific barriers they face, thus enabling effective access to, participation in, and outcomes from mainstream education provision, with such targeting taking place outside of school hours and/or of school setting.
- A targeting of disadvantage that acknowledges the disadvantage of most Travellers while at the same time effectively taking account of their cultural diversity and responding to their experiences of discrimination and racism.

Local coalitions would usefully agree on the design for such models and ensure that they are effectively applied.

Mobilising National Level Actors

The centrality of local coalition building and local drivers in the symbolic policy implementation context, is not to preclude the contribution to be made by national actors in driving policy implementation.

There is an emphasis, by some interviewees, on the need for a dedicated Traveller education policy to drive effective policy implementation. This would be based on the data already being gathered by the Department, with the use of an ethnic identifier by schools. Such a policy would enable a prioritisation of a focus on Travellers, underpin their appropriate inclusion in mainstream policies, and give direction to necessary targeting of Travellers to enable an effective mainstreaming.

A Traveller education policy would set out and clarify the focus for local coalition building in establishing a relevance for the symbol of Traveller culture and identity to education provision and the direction for policy and practice required by such recognition of Traveller culture and identity. Such a policy might lessen policy ambiguity, at national level, however, it would likely intensify policy conflict. Nonetheless, it would create a necessary foundation to advance policy implementation more effectively in a context of 'symbolic implementation'.

There is agreement among most of the education stakeholders interviewed, on the future potential of the Inspectorate in driving and enabling change in Traveller education. There is a need noted for some priority to be given to Travellers in the work of an under-resourced Inspectorate and to evolving the inspectorate quality framework processes and tools to include an adequate focus on Travellers, if such potential is to be realised. This evolution could include more specific reference to Travellers and to intercultural education, alongside specific inspection processes focused on Travellers, akin to those inspections already implemented on the disability ground.

Data on Traveller access, participation, and outcomes is noted as another important national driver for a system-wide monitoring. The use and application of these data, to the extent that Travellers have self-identified, is at an initial stage. It was noted that the data could be used to: set targets for and monitor Traveller access, participation, and outcomes from education; trigger specific actions by the Inspectorate; and inform the design and review of mainstream policies to maximise their impact for addressing Traveller education inequality.



06



looking forward

Looking Forward

The Situation

Travellers experience outcomes of inequality across the full spectrum of policy fields. In this research, outcomes of inequality are documented in relation to the policy fields of accommodation, health, and education. These unequal outcomes reflect an issue of significant policy implementation failure. Such unequal outcomes are deemed a pointer to issues of systemic discrimination, understood as institutional procedures, systems, and culture, disadvantaging a minority ethnic group, such as Travellers, through their design and operation, as opposed to through individual or collective intent. In such a context, it is important to focus on policy implementation, to better understand its dynamics, and to develop change strategies for policy implementation.

Traveller culture and identity hold important symbolic and practical meaning for Travellers and for more equal policy outcomes for Travellers. The official conceptualisation of Traveller culture and identity has moved from denial and the search to assimilate Travellers, to misunderstanding and the search to integrate Travellers, and to recognition and the search to include Travellers based on an acknowledgement of the need to address the practical implications of Traveller culture and identity and to dismantle all forms of racism. This shifting conceptualisation, and specifically, the manner in which this evolution is reflected in policy design and in policy implementation, is a key contextual parameter for any understanding of policy implementation failure.

The Model

Matland's ambiguity-conflict model offers a tool with which to examine policy implementation and to establish some implications for action on change in policy implementation. Policy conflict can be evident in such as disputes, clashing interests or incompatibility of objectives in relation to: policy goals and objectives; and the means of implementation. Policy ambiguity is about levels of clarity, which can reflect limited or differing understandings of policy goals and objectives or uncertainty about the means of implementation.

Applying the Model

Policy implementation in the three policy fields examined in this research, is characterised by 'high conflict-high ambiguity'. The policy implementation process, in these fields, is thus characterised by 'symbolic' implementation. This refers to policies that invoke what Matland refers to as "highly salient symbols". In these instances, the symbols invoked in policy relate to Traveller culture and identity, the recognition of cultural difference, and the acknowledgement of its practical implications.

Policy conflict, across the three policy fields, emerges in relation to the dual approach to policymaking and implementation that encompasses an interlinking of mainstreaming and targeting. This dual approach involves action to adapt mainstream service provision to take account of the practical implications of cultural difference and enable Traveller access, and action to target initiatives on Traveller to address specific needs and to create the conditions to access mainstream services. Conflict relates to the balance of emphasis between the two strands, whereby one is favoured over the other and the interlinked nature of a dual approach is lost. In education and health, the dominant perspective evident in policymaking favours a primarily mainstreaming approach. On the other hand, in accommodation, the dominant perspective in policymaking favours a primarily targeted approach.



Policy conflict is evident across the three policy fields in relation to the identification, role, and primacy of the national driver for policy implementation. In the accommodation policy field, there is further conflict in relation to the nature of policy goals and objectives. In the health policy field, there is further policy conflict in relation to pursuing an approach to policymaking and implementation that includes for addressing the social determinants of health. In the policy field of education there is further conflict in relation to an understanding of interculturalism as encompassing a focus both on cultural difference and on racism, rather than a sole focus on cultural difference.

Policy ambiguity, across the policy fields of health and education, emerges in relation to the understanding of the two strands, mainstreaming and targeting, whereby policymakers deem the targeting of disadvantage as sufficient to capture a focus on Travellers, with limited or no attention given to the specific issues of cultural difference and racism that accompany Travellers experience of disadvantage. In the accommodation policy field, a similar policy ambiguity pertains in relation to the lack of attention to addressing the practical implications of cultural difference in policymaking and policy implementation governing mainstream housing services and homeless services.

Policy ambiguity, across the three policy fields, further emerges in relation to policy goals and objectives. In the policy fields of health and education, this ambiguity is the result of the absence of defined national Traveller policies to mark out and underpin the symbol of Traveller culture and identity, and to set out the approach to addressing its practical implications. In the field of accommodation, a similar policy ambiguity pertains, in relation to policy goals and objectives, that is the result of different perspectives on the nature and validity of the identification of Traveller accommodation preferences. In the health policy field, there is further policy ambiguity in a context of major health sector reforms.

Implications: Local Organising

Matland's model posits that, with 'symbolic implementation' and the context of high conflict and high ambiguity that characterise it, the local policy delivery level holds the key to policy implementation. In particular, the model emphasises local delivery level 'coalition strength' as the key outcome driver. In seeking to advance policy implementation, the focus for attention must, therefore, be at the local delivery-level, and the concern at this level must be the building of strong and effective coalitions behind policy implementation with a view to achieving equality and fulfilling human rights for Travellers.

This presents challenges. In a centralised policymaking system, the focus in seeking change is inevitably drawn to the centre. This has worked in the past, in relation to policymaking, and its impact can be seen in the growing focus on Traveller culture and identity in policymaking over the decades since the Report of the Task Force on the Travelling Community. However, a centralised focus has not worked in the same way for policy implementation. This failure, and the analysis enabled by the Matland model, suggests the need for a different approach to securing policy implementation, focused primarily on the local delivery level, in particular in a situation where policy conflict and ambiguity are both high.

Local level coalitions do not implement policy, that remains the task of the responsible public body or institution. Local level coalitions should serve to drive, inform and ensure this policy implementation.

At local level, coalition builders need to be identified, resourced, and enabled. Traveller organisations have a key role as coalition builders. This demands specific strengths and strategy from Traveller organisations, which need to be appropriately resourced to make this contribution. Similarly, professionals within key statutory services have a similar potential as coalition builders. This demands specific knowledge and awareness from these professionals, with capacity-building alongside management support needed to enable such a contribution. Different coalition builders can emerge in different locations, but it is likely they will include these actors at a minimum.

Spaces or structures for coalition building need to be identified/established, and resourced at local level, in a manner that secures their influence and impact for policy implementation. Existing structures could usefully be evolved to serve as effective spaces, in particular, those structures established as part of the current policy framework, such as the LTACCs in the accommodation policy field, and the THUs in the health policy field. The available evidence on the operation of the LTACCs, however, indicates that their role, decision-making power, and composition and capacity would need to be reviewed in order for these sites to realise their potential in this regard. Likewise, the available evidence on the operation of the THUs indicates that the role, seniority and breadth of their composition, decision-making powers, and resource levels need to be reviewed for them to realise their potential in this regard.

New spaces or structures are required in the field of education as there is no such tradition to-date at local level. In this policy field, a uniform approach is not required under this local organising approach, and various spaces or structures hold potential:

- Traveller organisations could serve as a hub around which to establish such local coalitions, in particular, bringing together key actors with different responsibilities in the education policy field.
- The STAR pilot education initiatives could offer useful structure or space for this coalition building at local level where such initiatives are in place and deemed to be effective.

Traveller Interagency Groups deemed to be effective, could provide the initiative to establish such an infrastructure for the education field.

Coalition composition needs to be a focus for attention and support. Effective coalitions need to include senior decisionmakers, from relevant allies, to enable their influence. They need to include a diversity of actors, including organisations not currently directly engaged on Traveller policy implementation, but with a contribution to make and a commitment to the change needed to enable policy implementation.

Coalition themes or models of policy implementation that resolve current conflicts and ambiguities affecting policy implementation, need to be developed and pursued, or sustained and their effective application needs to be ensured. In particular, such models, that need such input and whose effective application needs reinforcement, would include:

- **The dual approach of interlinked mainstreaming and targeting**, ensuring a balance of attention to both, where policy implementation includes action to achieve change in the operation of mainstream provision to accommodate the practical implications of Traveller cultural difference, and investment in targeted provision to meet specific needs and to repair the significant inequalities that persist for Travellers.

- **The intercultural approach**, where policy implementation includes a focus on recognition for and understanding of Traveller culture and identity alongside a focus on understanding and addressing racism at the individual and systemic levels.
- **Targeted approaches to disadvantage that achieve outcomes for Travellers**, where policy implementation includes a focus on addressing individual and systemic racism as a causal and aggravating factor for disadvantage, and a concern to take account of the practical implications of Traveller culture and identity in their design and implementation.
- **The social determinants approach** to addressing health inequalities, where policy implementation includes a focus on addressing adverse social determinants of health (such as educational disadvantage, poverty, insecure and inadequate accommodation, and racism and discrimination), and involves cross-government approaches with the relevant agencies, to eradicate such health inequalities.

These models need to be documented, become a focus for exchange between local areas, and serve as drivers for change in national policy and the work of national actors with a remit relevant to policy implementation. These models need to emerge as good practice standards.

At local level, **local action-planning** through local coalitions needs to be a feature in the implementation of national Traveller policy strategies. This is evident in the preparation of Traveller Accommodation Programmes and is mooted in relation to the forthcoming NTHAP, though not yet a focus in the policy field of education. Having local action plans enables: some prioritisation for a local focus on Travellers; local particularities to be taken into account; and mobilisation of local resources.

Implications: National Enabling

Regarding policies characterised by ‘symbolic implementation’, national-level actors will still have a key role to play in creating the conditions for and monitoring policy implementation. In this instance, these national level actors encompass first and primarily those departments and national agencies with responsibility for policymaking. They include relevant national regulatory authorities that act as guardians for core underpinning standards for policy implementation. They further include those national spaces and structures that enable participative approaches in bringing government departments and statutory agencies together with national Traveller organisations.

To progress policy implementation under this model, government departments and national statutory agencies need to:

- **publish national Traveller-focused policy that invokes the key symbol of Traveller culture and identity** and sets out the manner in which this culture and identity is to be recognised in the particular policy field, and the approach to be pursued in addressing its practical implications in policy implementation. Such policy sets the necessary context for local coalition building, local creation of models for policy implementation, and local action-planning to progress policy implementation based on the goals of achieving equality and fulfilling human rights;
- **enable local coalition building**, creating the terrain for this, with arrangements provided for in national Traveller policy, to advance policy implementation by:
 - **making resources available to the local level** for the formation and operation of local coalitions, and
 - **promoting involvement of key local statutory and other agencies** in local coalitions, with national prompts that make it in their interests to form an active and engaged part of such local coalitions;
- **ensure specific units established**, at national and local level, with responsibility for Traveller policy have adequate human and financial resources to make an impact, and adequate seniority and reach across the department/agency, to ensure attention to mainstreaming;

- **ensure a specific unit is established within the Department of Children, Equality, Disability, Integration,** and Youth with adequate human and financial resources to enable implementation of a new National Traveller and Roma Inclusion Strategy; and
- **track and monitor progress in policy implementation,** ensuring effective use of an ethnic identifier, establishing appropriate targets and key performance indicators, and ensuring consequences for missed targets.

This report has noted a number of key statutory agencies, with regulatory powers, that have an ongoing role to play in supporting the effective and appropriate implementation of Traveller policy, and underpinning standards in relation to planning, equality and human rights. These include the Office of the Planning Regulator (OPR),¹⁵⁸ the Irish Human Rights and Equality Commission (IHREC),¹⁵⁹ and the Ombudsman for Children Office (OCO).¹⁶⁰ These bodies offer potential, in particular:

- the OPR, in ensuring adequate and effective implementation of its good practice checklist for the inclusion of a focus on Traveller accommodation in Local Authority Development Plans;¹⁶¹
- the IHREC, in ensuring an adequate and effective implementation of the statutory public sector equality and human rights duty as part of ensuring implementation of the wider body of recommendations made to local authorities on foot of the equality reviews undertaken by the Commission;¹⁶² and
- the OCO, in ensuring progress on its commitment to pursue the progressive realisation of rights of vulnerable groups of children and young people, with particular attention to Travellers.¹⁶³

These national bodies need to liaise and coordinate in finding a best-fit positioning with regard to the other national actors playing a role in relation to Traveller policy, in order to maximise their contribution to and impact on policy implementation.

National structures that enable participative approaches to policymaking, policy implementation and policy monitoring are important in enabling the national contribution to policy implementation under this model, and need to strengthen and evolve to be effective and influential in this purpose. Some of these national structures require further development. In the accommodation field there is the National Traveller Accommodation Consultative Committee, with a basis in legislation and an independent Chair. In the health field, the only such structure currently in place, while awaiting the National Traveller Health Action Plan, is the National Traveller Health Advisory Forum and this is identified as being limited in its advisory role and in the breadth and seniority of its composition. In the education field, there is a reliance on the structures for education created under the NTRIS, in particular the NTRIS education subgroup, and the latter is identified as being limited in its scope and influence.

These national participative structures need to play a lead role in examining the models developed by local coalition structures and the policy implementation challenges faced by local coalition structures, and in developing and promoting new national guidance and standards based on this examination to promote a coherent approach across different local areas.

158 The OPR was established in 2019 on foot of recommendations made by the (Mahon) Tribunal of Inquiry into Certain Planning Matters and Payments. The OPR role is to ensure that local authorities and An Bord Pleanála support and implement Government planning policy. The OPR also implement planning research, training and public awareness in order to promote the public's engagement in the planning process and to enhance knowledge and public information about planning in Ireland.

159 The Irish Human Rights and Equality Commission was established under the Irish Human Rights and Equality Commission Act 2014. Its core functions include to protect and promote human rights and equality; encourage development of a culture of respect for human rights, equality and intercultural understanding; promote understanding and awareness of the importance of equality and human rights; encourage good practice in intercultural relations; and work towards elimination of human rights abuses, discrimination and prohibited conduct.

160 The OCO, established under the Ombudsman for Children Act (2002), is a human rights institution that promotes the rights and welfare of young people under 18 years of age. Its core functions are: to deal with complaints made by or for children and young people about the actions of public organisations, and to promote the rights and welfare of children and young people under 18 living in Ireland.

161 Office of the Planning Regulator (2019), *Op Cit*.

162 Section 42, Irish Human Rights and Equality Commission Act 2014, requires public bodies to have regard to the need to eliminate discrimination, promote equality of opportunity, and protect human rights for staff, service users, and policy beneficiaries in the implementation of all their functions.

163 Strategic Plan 2019-2021, Ombudsman for Children Office, 2019.

The structures developed around the NTRIS have an important contribution to make in enabling interdepartmental and interagency coordination and collaboration at national level. This contribution needs strengthening and evolution under this model. This could be achieved as part of the new NTRIS under consideration. More broadly, policy implementation, and enabling policy implementation based on this model, will need to be a key focus in this new NTRIS for the forthcoming period, taking on board the learning from this research.

This might further and usefully serve to put the issues of policy implementation and strategies to secure policy implementation at national level, on the European agenda, within the structures that function in relation to the European Union Roma Strategic Framework.

Finally, in a context where local organising is central to securing policy implementation, local Traveller organisations need to be recognised as key actors for the effective progressing of such an approach. This demands time and skills from the local Traveller organisations and their recognition as key actors needs to be accompanied by adequate and appropriate programmes to resource their work and organisation building. An infrastructure of strong local Traveller organisations will be central to this model to drive change for Travellers and impact from policy implementation. A programme of national funding to enable local Traveller organisations to play an effective and strategic role for this approach is essential.

Peer-led initiatives emerge as a key element in the role that can be played by Traveller organisations under this approach of emphasising local organising for policy implementation. This has been most effectively modelled in the health policy field (though its current funding is deemed to be limited), and to a lesser extent in the accommodation policy field, in the employment by local authorities of Travellers as Traveller Liaison Offices, and in the education policy field, in the STAR projects. A programme of national funding for peer-led initiatives is needed, in all three policy fields, that is adequate in the resources made available and that is appropriate to each policy field.



“

...effective coalitions
need to include
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from relevant
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their influence...

”





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