



Pre-budget Submission 2022

June 2021

Pavee Point Traveller and Roma Centre is a non-governmental organisation committed to the attainment of human rights for Travellers and Roma. The organisation comprises Travellers, Roma and members of the majority population working in partnership to address the needs of Travellers and Roma, who as minority ethnic groups experience exclusion and marginalisation.

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Summary of Recommendations

- 1. Equality Proofing Budgets, and Equality Monitoring**
 - Publish a **gender and equality budgeting statement** with the budget to include disaggregated data on gender and all equality grounds, including ethnicity and membership of the Traveller & Roma communities
 - Collect, analyse and disseminate disaggregated data by ethnicity and gender across relevant administrative systems in line with human rights standards, and use this data to inform **Ethnic Equality Monitoring** and equality proof state policies, budgets and programming
- 2. Funding Social Inclusion and Anti-Racism**
 - Ensure **sufficient investment in Traveller and Roma specific programming** to support Traveller and Roma inclusion, particularly addressing the socio-economic impacts of COVID-19
 - Ensure the development of the new **National Traveller Roma Inclusion Strategy** is sufficiently resourced, and includes a robust implementation and monitoring plan with clear targets, indicators, outcomes, timeframes and budget lines
 - Ensure the forthcoming **National Action Plan Against Racism** will address the specific forms of anti-Traveller and Roma racism and discrimination; is adopted in a timely fashion; afforded a sufficient budget; a clear implementation and monitoring framework; and is implemented in partnership with Traveller and Roma organisations
- 3. Social Protection and Employment**
 - Develop a gender proofed **National Traveller Employment Strategy** as part of the new Pathways to Work strategy
 - Make **Child Benefit payments a truly universal payment** that is not contingent on the fulfilment of the Habitual Residence Condition
 - Ensure that **women leaving domestic violence situations are not subject to Habitual Residence Condition** test in order to access housing supports and social protections
- 4. Accommodation and Housing Supports**
 - Ensure full **implementation of recommendations by an Independent Expert Group on Traveller accommodation**, including overhauling legislation and policies which impact on accommodation provision for Travellers
 - **Establish and fully resource a statutory Traveller Agency** with powers to approve and enforce agreed Government policies on Travellers & Roma including provision of Local Authority accommodation to address Traveller homelessness/improvement of Traveller halting sites and ensuring budgets are fully spent.
 - Resource the introduction of **Roma accommodation actions in the NTRIS** to address the extreme housing and accommodation situation of Roma
- 5. Traveller and Roma Health Supports**
 - Publish the **National Traveller Health Action Plan** with no further delay and allocate clear and robust budget lines for its implementation.
 - Ensure **Roma Health Advocates** are appointed in each CHO as a matter of urgency, as committed to in the HSE National Service Plan. These new positions will need a clear governance structure, involving NGOs working with Roma, to ensure that resources are allocated to the community effectively
- 6. Traveller and Roma Education**
 - Urgently implement the Programme for Government commitment to developing and implementing the **National Traveller Education Strategy** and ensure it has a robust implementation and monitoring plan with associated dedicated resources in Budget 2022

Introduction

There are a little over 36,000 Irish Travellers in Ireland, representing less than 1% of the nation's population.ⁱ An estimated 5,000 Roma live in Ireland, with Roma families identified in every county.ⁱⁱ

As minority ethnic groups, Travellers and Roma experience persistent racism and discrimination on the basis of ethnicity, gender and other grounds. As a result, Travellers and Roma are among the most marginalised and excluded individuals and groups in Ireland. The stark health inequalities, poor accommodation conditions, poverty, low educational attainment, and high levels of unemployment faced by Travellers and Roma are well documented. Yet, resourced actions to address these issues have been too slow.

The ongoing COVID-19 pandemic has exposed the deep-seated inequalities experienced by Travellers and Roma in Ireland. We have seen throughout the pandemic, that it is the most vulnerable people who are being hit the hardest. Our budget 2022 proposals seek to ensure a just recovery, which is inclusive of Travellers and Roma, ensuring budgetary decisions are based on human rights considerations and principles.

Equality Proofing Budgets and Equality Monitoring

The Citizens' Assembly on Gender Equalityⁱⁱⁱ made a recommendation to legislate for equality budgeting across all Government bodies including local authorities. If this is to become a reality, resources are needed to support the embedding of equality budgeting across government departments.

In line with state policy^{iv} and legislation,^v Ireland has committed to developing a system of ethnic data collection across state departments and agencies. However, while progress has been made with some state agencies,^{vi} there have been major issues and resistance to progress ethnic data collection with others.^{vii} The urgency to develop and implement ethnic data collection is particularly pertinent during the current pandemic with a number of European institutions having issued statements to draw attention to the disproportionate impact of COVID-19 on Travellers and Roma.^{viii} We urge the Government to provide the necessary resources to relevant agencies and government departments to advance this area of work as a matter of priority.^{ix}

RECOMMENDATION:

- a) Publish a gender equality impact statement with Budget 2022 with disaggregated data on Travellers, ethnicity, disability and other equality grounds
- b) Collect, analyse and disseminate disaggregated data by ethnicity and gender across relevant administrative systems in line with human rights standards, and use this data to inform Ethnic Equality Monitoring and equality proof state policies, budgets and programming

Funding for Social Inclusion and Anti-Racism

Pavee Point welcomes the current ongoing evaluation of 3 national inclusion strategies that are all due to expire at the end of 2021: the National Traveller Roma Inclusion Strategy, the National Strategy for Women and Girls, and the Migrant Integration Strategy. Unfortunately, implementation of the National Traveller Roma Inclusion strategy has been very slow, without clear implementation plans, a monitoring framework, or robust resourcing. In order for meaningful improvements in the lives of Travellers and Roma in Ireland, the next strategy must be outcomes focused, with clear timelines, dedicated funding and a 'whole of Government' approach.

We remain concerned at the persistent, as well as increased reports during the COVID-19 pandemic, of anti-Traveller and Roma racism.^x Ireland has not yet renewed the 2008 National Action Plan against Racism, and anti-racism initiatives in the context of the Migrant integration Strategy excluded Irish Travellers from their scope.^{xi} Within this context, we have welcomed the recent establishment of the Anti-racism Committee which is currently tasked with drafting a new Anti-racism Strategy.^{xii} Again, for meaningful change to take place, this strategy must also be adequately resourced.

RECOMMENDATIONS:

- a) Ensure sufficient investment in Traveller and Roma specific programming to support Traveller and Roma inclusion, particularly addressing the socio-economic impacts of COVID-19
- b) Ensure the development of the new National Traveller Roma Inclusion Strategy is sufficiently resourced, and includes a robust implementation and monitoring plan with clear targets, indicators, outcomes, timeframes and budget lines
- c) Ensure the forthcoming National Action Plan Against Racism will address the specific forms of anti-Traveller and Roma racism and discrimination; is adopted in a timely fashion; afforded a sufficient budget and a clear implementation and monitoring framework; and is implemented in partnership with Traveller and Roma organisations

Social Protection and Employment

We regret that Travellers and Roma have not been named as target groups in key mainstream employment policy initiatives,^{xiii} and that no dedicated strategy has been developed to address the significant levels of discrimination in employment and unemployment faced by Travellers and Roma.^{xiv} Most recently, the CERD Committee urged Ireland to adopt effective measures with adequate resources to improve employment among Travellers and Roma.^{xv} It is vital to incorporate such measures into Ireland's post-covid resilience and recovery plans.

We are further concerned at the disproportionate and discriminatory impact that the application of the European Directive 2004/38 and the subsequent state's own policy - Habitual Residence Condition- has on the ability of many Roma to access basic social protection, including Child Benefit^{xvi} Despite residing in the jurisdiction for several years, many Roma lack the necessary documentation, proof of address and/or language and literacy skills to prove their connection to the State.^{xvii} This places many families, especially women and their children in extreme poverty, and makes it difficult for Roma women suffering from domestic and sexual violence to seek support and protection. Concerns about the discriminatory impact of the application of the Habitual Residence Condition have been raised by the Special Rapporteur on extreme poverty and human rights,^{xviii} ECRI,^{xix} HRC,^{xx} CESCR,^{xxi} and CRC.^{xxii}

RECOMMENDATIONS

- a) Develop a gender proofed national Traveller employment strategy as part of the new Pathways to Work strategy
- b) Implementation of commitment in the apprenticeship action plan to a bursary programme to fund 100 apprentices per year from marginalised groups, including lone parents, disabled people, Travellers, and Roma

c) Make child benefit a truly universal payment for all children living in Ireland, not contingent on the fulfilment of habitual residence condition (HRC) or other residency status

d) Ensure women leaving domestic violence situations are not subject to HRC in order to access housing supports and social protections

Accommodation and Housing Supports

The persistent and deteriorating accommodation crisis among Travellers and Roma has been greatly exacerbated by Ireland's ongoing housing and homeless crisis and the current pandemic.^{xxiii} The legislative framework (Housing (Traveller Accommodation) Act 1998) to drive the provision of Traveller specific accommodation has fallen short. Local Authorities continuously fail to meet their legal duty to ensure adequate, safe and culturally appropriate accommodation for Travellers, and despite the Traveller accommodation budget having slowly increased, a significant portion of Traveller accommodation budgets remain unspent by Local Authorities. In 2020, €14.5 million was allocated to the delivery of Traveller specific accommodation. However, by the end of October 2020 only 45.5% of the funding had been drawn down by Local Authorities, with nine Local Authorities failing to draw down any of the allocated funds.^{xxiv}

In 2019, an independent Expert Group on Traveller Accommodation set out a clear recommendation to overhaul all relevant legislation and policies which impact on accommodation provision for Travellers,^{xxv} and a number of human rights bodies have urged Ireland to tackle the problem of underspent Traveller accommodation budgets and failure to deliver Traveller accommodation by Local Authorities.^{xxvi}

Roma face discrimination in accessing accommodation, severe overcrowding, homelessness, and structural barriers to social housing, rent supplement and homeless supports.^{xxvii} This often leaves Roma families with rough sleeping or staying with family and friends in unsuitable, overcrowded accommodation as their only options. While Ireland has indicated a commitment to include Roma specific housing actions in the National Traveller Roma Inclusion Strategy, there are currently no such actions in the Strategy.

RECOMMENDATIONS:

a) Ensure full implementation of recommendations by an Independent Expert Group on Traveller accommodation, including overhauling legislation and policies which impact on accommodation provision for Travellers

b) Establish & fully resource a statutory Traveller Agency with powers to approve and enforce implementation of agreed Government policies including Local Authority accommodation to address Traveller homelessness/improvement of Traveller halting sites and ensuring budgets are fully spent.

c) Resource the introduction of actions in the NTRIS to address the extreme housing and accommodation situation of Roma

Traveller and Roma Health

Travellers and Roma experience stark health inequalities when compared to the general population.^{xxviii} The current pandemic has had a disproportionate impact on Travellers and Roma with the rate of testing positive for COVID-19 being significantly higher than the national figure.^{xxix} Within this context, it has been welcomed that Ireland has worked towards developing its first ever National Traveller Health Action Plan (NTHAP). However, there are significant delays with its publication and we remain concerned about the monitoring and implementation framework and resources afforded to its implementation,

particularly in the context of the persistent and deteriorating health situation due to COVID-19.

Roma also face additional barriers to healthcare due to the absence of dedicated Roma health advocates, unequal access to medical cards, as well as interpretation and translation supports within the health service.

RECOMMENDATIONS

a) Publish the National Traveller Health Action Plan with no further delay and allocate clear and robust budget lines for its implementation in Budget 2022, including specific budget lines to address the health inequalities experienced by Traveller women

b) Ensure Roma Health Advocates are appointed in each CHO as a matter of urgency, as committed to in the HSE National Service Plan. These new positions will need a clear governance structure, involving NGOs working with Roma, to ensure that resources are allocated to the community effectively

Traveller and Roma Education

Despite the educational disadvantages faced by Travellers and Roma, mainstream educational strategies do not contain actions aimed at increasing Traveller and Roma participation in early years, primary or post-primary levels.^{xxx} We have welcomed the explicit targeting of Traveller participation in higher education,^{xxxi} and a recent commitment to develop the first ever National Traveller Education Strategy.^{xxxii} In the context of the current pandemic and school closures, the risk of deepening educational disadvantage among Travellers and Roma needs to be urgently tackled through these policy measures.^{xxxiii}

RECOMMENDATION

a) Urgently implement the Programme for Government commitment to developing and implementing the National Traveller Education Strategy and ensure it has a robust implementation and monitoring plan with associated dedicated resources in Budget 2022

Traveller and Roma Women

Ireland is currently preparing to develop the next National Traveller and Roma Inclusion Strategy (2017-2021), Strategy for Women and Girls (2017-2020) and Strategy on Domestic, Sexual and Gender-based Violence (2016-2021) - this provides a timely opportunity for Ireland to ensure a coordinated approach and prioritisation of Traveller and Roma women in these key policy measures. To date, actions related to Traveller and Roma women have not been adequately resourced and the associated implementation plans have failed to define or reach clear gendered targets, indicators or outcomes.

Pavee Point welcomed the funding of a small Traveller Domestic and Sexual Violence Pilot Project 2019-2022.^{xxxiv} However, we regret that An Garda Síochána, Court Service or Tusla Child and Family Agency do not either collect, or routinely collect, data in line with human rights standards about the ethnicity of victims of domestic and sexual violence. We are also deeply concerned at the increased reports by Traveller and Roma women who have been unable to seek support or protection from domestic and sexual violence services during the pandemic, and we urge the Government to expand the development of Traveller and Roma specific domestic and sexual violence initiatives.

RECOMMENDATIONS

- a) Include Traveller and Roma women in the SAVI study on sexual violence
- b) Ensure a coordinated and integrated approach to actions targeting Traveller and Roma women in the next National Traveller Roma Inclusion Strategy, National Strategy for Women and Girls and National Strategy on Domestic, Sexual and Gender-based Violence, including measures that adopt community development approaches to support Traveller, Roma and other minority ethnic women

APPENDIX 1: Statistical information regarding the human rights situation of Travellers and Roma in Ireland.

Traveller Statistics

Health^{xxxv}

- 134 excess Traveller deaths per year
- Infant mortality rate for Travellers is 3.7 times the national rate (14.1 per 1,000 live births compared to 3.9 per 1,000 live births) and 2.8 times the EU average
- Life expectancy at birth for male Travellers is 15.1 years less than males in the general population, and 11.5 years less for female Travellers than females in the general population
- suicide rate for Traveller women is 5 times higher than women in the general population and 7 times higher for men
- 42% of Travellers under 15 years of age compared with 21% of the general population

Education^{xxxvi}

- 13% of Travellers complete secondary education in comparison with 92% of the general population.
- 57.2% of Traveller males were educated to primary level at most, compared with just 13.6% of the general population
- Less than 1% of Travellers go on to third level education
- 13.3% of Traveller girls are educated to Upper Secondary School level compared to 69% of general population

Accommodation^{xxxvii}

- Nearly 40% of Traveller households had more persons than rooms compared with less than 6% of non-Traveller households
- Traveller overcrowding 7 times the national rate
- 15% of all Travellers are homeless; the equivalent to 709,632 people in the general population^{xxxviii}
- Approximately 1,700 Travellers live on the roadside without basic facilities^{xxxix}

Discrimination

- Travellers are 10 times more likely than White Irish to experience discrimination in seeking work^{xl}
- Travellers are over 22 times more likely than White Irish to report discrimination in shops, pubs and restaurants^{xli}
- 80.2% of Travellers are unemployed (Census, 2016)
- 40% of Travellers experience discrimination in accessing health services^{xlii}

Roma Statistics^{xliii}

Health

- Over 1 in 3 (38.9%) of Roma do not have a GP
- Half of Roma do not have a medical card
- Almost 1 in 4 (22.5%) Roma reported having diabetes
- 24% of women do not access health services while pregnant

Access to Social Protection and Poverty

- 25.5% of Roma don't have the right to reside and 25.7% of Roma are not habitually resident
- Nearly 1 in 2 (49.2%) households with children were not successful in their application for social protection payments, which means they are not receiving the child benefit
- 1 in 4 Roma children (25%) have gone to school hungry
- Almost half (49.5%) of Roma reported not always having enough food
- 83% of Roma are unemployed
- Almost 1 in 5 Roma reported begging as a source of income (17.6%) and no income (14%)
- 57.5% report not having enough money for school books and uniforms

Accommodation

- 6.6% of Roma report to be currently homeless and almost half (45.7%) have been homeless at some stage
- 1 in 5 Roma (24%) lived in households of 8 or more people
- Almost half (44.8%) of Roma did not have enough beds in their accommodation
- Almost 1 in 10 (7.3%) Roma live in households with 10+ people
- Facilities: No kitchen (12.4%); No cooker (9.6%); No fridge (13.5%); Cannot keep the house warm (66.3%)

Discrimination

- 78.9% of Roma feel discriminated in getting a job
- 93.3% feel discriminated in getting accommodation
- 84.4% feel discriminated in getting social welfare
- 81.1% feel discriminated in a public setting

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

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

ⁱⁱⁱ Citizen's Assembly on Gender Equality <https://www.citizensassembly.ie/en/news-publications/press-releases/recommendations-of-the-citizens-assembly-on-gender-equality.html>

^{iv} As per the National Traveller and Roma Inclusion Strategy (2017-2021); Second National Strategy on Domestic Sexual and Gender based Violence; Migrant Integration Strategy 2017-2020; The National Strategy for Women and Girls 2017-2020.

^v Obligations set out in Section 42 of the Irish Human Rights and Equality Act (2014).

^{vi} The Central Statistics Office has included Travellers as an administrative category in the Census since 2006, and Roma will be included in Census 2022. Progress has also been made with ethnic data collection with National Social Inclusion Programmes.

vii An Garda Síochána and the Courts Service have reported that there is ‘no legal basis for ethnic data to be collected’ and that ethnic data is not relevant to their services. Where steps have been taken to disaggregate data by ethnicity by some state agencies, it hasn’t always taken place in line with human rights standards. For instance, a small number of health service providers have introduced ethnic identifiers. However, ethnic categories are not standardised; ethnic identity is often ascribed to Travellers and Roma by using proxies such as name or looks; and the data is not disaggregated, analysed or provided to stakeholders within an appropriate timeframe.

viii European Commission, European Union Agency for Fundamental Rights, Organization for Security and Co-operation in Europe Office for Democratic Institutions and Human Rights, and the Council of Europe have all noted the disproportionate impact of COVID-19 on Roma and Travellers throughout the pandemic. Concerns at the lack of disaggregated data by ethnicity in formulating and monitoring policy and programming in Ireland have been raised by numerous international human rights monitoring bodies- UNCESCR, *Concluding Observations on the Third Periodic Report of Ireland*, E/C.12/IRL/CO/3, 19 June 2015; ECRI, *Second Report on Ireland*, CRI (2002) 3, 23 April 2002; UNCEDAW, 2017; UNCRC, 2016; HRC, 2014; FCPNM, 2019; ECRI, 2019; CERD, 2019.

ix We welcome the recent attention by An Garda Síochána and Tusla Child and Family Agency to conduct an assessment of the legal basis of recording ethnicity. Policing Authority has made a number of recommendations regarding ethnic data collection by An Garda Síochána, [Report on Policing Performance by the Garda Síochána during the COVID-19 Health Crisis](#), 18 Feb 2021.

x COVID-19 has had a disproportionate impact on Travellers and Roma when examining rates of testing positive for COVID-19. This has led to increased reports of racism in Ireland and across Europe with Travellers and Roma effectively being blamed for spreading the virus, Bhabha, J., M., Matache, ‘Anti-Roma Racism is Spiralling During COVID-19 Pandemic’, *Health and Human Rights Journal*, 7 Apr 2020, <https://www.hhrjournal.org/2020/04/anti-roma-racism-is-spiraling-during-covid-19-pandemic/>.

xi A number of other international human rights treaty bodies have urged the state to adopt a new action plan against racism, including UNCRC, 2016; HRC, *Concluding Observations on the Fourth Periodic Report of Ireland*, CCPR/C/IRL/4, 19 August 2014; FCPNM, 2019; ECRI, 2019; CERD, 2019. National Action Plan on Racism 2005-2008 was never renewed and the National Consultative Committee on Racism and Interculturalism (NCCRI) was abolished in 2008.

xii Department of Justice and Equality, *Action Plan against Racism for Ireland to be drawn up by new Independent Anti-Racism Committee*, 19 June 2020, <https://www.gov.ie/en/press-release/6bedb-action-plan-against-racism-for-ireland-to-be-drawn-up-by-new-independent-anti-racism-committee/>.

xiii The Pathways to Work Strategy 2016-2020 or Future Jobs Ireland 2019, [Future Jobs Ireland- 2019- Preparing Now for Tomorrow's Economy](#). Department of the Taoiseach and the Department of Business, Enterprise and Innovation, 2019.

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

xv CERD, 2019.

xvi Establishing a right to reside is a prerequisite to meeting the HRC, which a person must meet in order to access welfare supports, including Child Benefit, Rent Allowance, public housing, and employment and training supports.

xvii 40% of Roma households with children are not successful in applying for social protection payments. Roma who are not successful in their social protection applications, the average number of years they have lived in Ireland is eight years. 84.4% of Roma also feel discriminated against in getting social welfare, regardless of the success of their application. Curran et al., 2018.

xviii UNGA, Report of the Special Rapporteur on extreme poverty and human rights, Magdalena Sepúlveda Carmona, A/HRC/20/25, 2012, Para 102, http://www.ohchr.org/Documents/HRBodies/HRCouncil/RegularSession/Session20/A-HRC-20-25_en.pdf.

xix European Commission against Racism and Intolerance, ECRI Report on Ireland Fourth Monitoring Cycle, CRI (2013)1, 2013, Para 130.

xx Human Rights Committee, *Concluding observations on the fourth periodic report of Ireland*, 2014. The Human Rights Committee expresses concern at the existence of administrative and financial obstacles for marginalized women to access essential support services, particularly women whose immigration status is dependent on her spouse or partner or who do not meet the Habitual Residence Condition.

xxi UN Committee on Economic, Social and Cultural Rights, *concluding observations on the third periodic report of Ireland*, E/C.12/IRL/CO/3 para 48, 19 June 2015 notes during consultations with civil society that concerns were raised by stakeholders ‘over the lack of adequate statutory guidelines in making Habitual Residence decisions and the degree of discretion left to Deciding Officers’ which, according to stakeholders ‘leads to varied decisions and an inconsistent appeals process.

xxii The Committee on the Rights of the Child has requested the State to provide additional information on the criteria for the fulfilment of the HRC to access social services and to provide information about measures taken to ensure that the HRC doesn’t result in children from Traveller and Roma ethnic minority backgrounds being excluded from primary care, child benefits and social protection, in Committee on the Rights of the Child, List of issues in relation to the combined third and fourth periodic reports of Ireland, CRC/C/IRL/Q/3-4, 2015.

^{xxiii} Overcrowding among Travellers is 7 times the national rate, Central Statistics Office, *Census 2016, Profile 8 - Irish Travellers Ethnicity and Religion*,

<http://www.cso.ie/en/csolatestnews/pressreleases/2017pressreleases/pressstatementcensus2016resultsprofile8-irishtravellersethnicityandreligion/>, and 15% of Travellers are homeless, Department of Housing, Planning and Local Government, *Total Number of Traveller Families in all categories of Accommodation*, 2018, Department of Housing, Planning and Local Government. In the National Roma Needs Assessment 46% of Roma reported having been homeless at some stage of their lives, 45% did not have enough beds in their accommodation, Curran et al., 2018.

^{xxiv} in Eoin Ó Broin TD, 'Less than 50% of Traveller Accommodation funding drawn down to date in 2020', 26Oct 2020, <https://www.sinnfein.ie/contents/58605>. Traveller accommodation budgets have fallen drastically from €40m in 2008 to a mere €14.5m in 2020, in Harvey, B., *Travelling with Austerity: Impacts of cuts on Travellers, Traveller Projects and Services*, Dublin, Pavee Point Publications, 2013; Meeting of the Joint Oireachtas Committee on Housing, Planning and Local Government on 5 December 2019, [Opening Statement of Damien English, TD, Minister of State at the Department of Housing, Planning and Local Government](#). With the Housing (Traveller Accommodation) Act 1998, the annual Traveller accommodation budgets are allocated to Local Authorities which have a legal responsibility to provide culturally appropriate, adequate and safe accommodation for Travellers.

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

^{xxvi} UNCRC, 2016; HRC, 2014; , CESCR 2015; CEDAW, 2017; FCNM, 2019; ECRI, 2019; Council of Europe's Commissioner for Human Rights, Nils Muižnieks, 2016.

^{xxvii} The application of the Habitual Residence Condition and the Housing Circular 41/2012 is precluding many Roma from accessing a range of social welfare supports, including housing and homeless support.

Habitual residence essentially means an applicant must be able to prove a close link to Ireland through evidence such as employment history, proof of address, this documentation can be difficult for some Roma to source, and there is little support for applicants in making their applications, in particular the availability of suitable translators.

The Housing Circular 41/2012 indicates that as an EU citizen living in Ireland, you must be in employment in order to be assessed for social housing support, including homeless services. If not, you must be unemployed due to illness, accident or involuntarily unemployed after being in employment for over a year and registered as a jobseeker with the Department of Social Protection. For Roma who do not meet these criteria a housing assessment cannot be completed. This is despite the fact that homelessness and Housing Authorities ability to provide homeless services and supports are specified in primary legislation without any such qualification.

The application of HRC is having a disproportionate and devastating impact on Roma in Ireland and is raising serious human rights concerns Curran et al., *National Needs Assessment*, 2018.

^{xxviii} Infant mortality rate for Travellers is 3.5 times the rate of the general population and Traveller suicide rate is 6 times higher than general population, in Kelleher et al., 2010. Over 1 in 3 (38.9%) of Roma do not have a family doctor/general practitioner, in Curran et al., 2018.

^{xxix} figures from third wave (February 16th) indicated 10% of Travellers had tested positive for COVID compared to national figure of just over 4%.incl ref By 1 July 2020 over 150 Travellers tested positive for COVID-19, with 3 deaths, and 70 Roma tested positive, with 7 deaths. Of those Travellers reporting tested for COVID-19, 12% were testing positive which was higher than the national figure of 6.7% in the general population. See HPSC figures [here](#). These figures are an undercount.

^{xxx} Pavee Point has welcomed the State's explicit targeting of Traveller participation in higher education through Equity of Access to Higher Education Access Plan 2015-2019 and the Progress Review of the National Plan for Equity of Access to Higher Education and the priorities to 2021. However, none of the mainstream educational strategies, including Delivering Equality of Opportunity in Schools Plan 2017, contain actions aimed directly at increasing Traveller participation at early years, primary or post-primary levels.

^{xxxi} This is being progressed through Equity of Access to Higher Education Access Plan 2015-2019 and the Progress Review of the National Plan for Equity of Access to Higher Education and the priorities to 2021.

^{xxxii} No dedicated Traveller education strategy has been introduced to date despite a commitment by the State to complete a review of 2006 Report and Recommendations for a Traveller Education Strategy. The Report was never developed into a Strategy and years later this review is still to be published. The Report led to the establishment and work of a Traveller Education Advisory Consultative Forum between 2009-2015 but the Forum was dismantled in 2015. There has also been no structure put in place to drive Traveller education policy since dismantling of the Forum in 2015. Education Sub-committee of the National Traveller Inclusion Strategy was only established to advance *a limited number* of education actions in the NTRIS.

^{xxxiii} We have welcomed guidance and resources issued by the State towards prioritising children from disadvantaged backgrounds during the pandemic. Department of Education and Skills, [Guidance on Continuity of Schooling For primary and post-primary schools](#), April 2020;

[School Meals Programme – Guidance for Schools](#), March 2020; [GRANT SCHEME FOR ICT Infrastructure – 2019/2020 SCHOOL YEAR €10m Funding to issue to Primary and post-primary schools](#), April 2020.

^{xxxiv} This project has been welcomed and is currently being reviewed by an independent external evaluator. In the context of the ongoing pandemic, heightened levels of domestic violence, and additional barriers faced by Traveller and Roma women to access safety and protection from domestic violence, such special measures need further development and support at a national scale.

^{xxxv} Summary of Findings," Our Geels All Ireland Traveller Health Study, September 2010, https://www.ucd.ie/t4cms/AITHS_SUMMARY.pdf

^{xxxvii} <http://www.cso.ie/en/csolatestnews/pressreleases/2017pressreleases/presstatementcensus2016resultsprofile8-irishtravellersethnicityandreligion/>

^{xxxviii} Department of Housing, Planning and Local Government (2018) Total Number of Traveller Families in all categories of Accommodation. Dublin: Department of Housing, Planning and Local Government

^{xxxix} Department of Housing, Planning and Local Government (2018) Total Number of Traveller Families in all categories of Accommodation. Dublin: Department of Housing, Planning and Local Government

^{xl} McGinnity, F., R. Grotti, O. Kenny and H. Russell, *Who experiences discrimination in Ireland?: Evidence from the QNHS Equality Modules*, Irish Human Rights and Equality Commission and Economic and Social Research Institute, 2017, <https://www.ihrec.ie/app/uploads/2017/11/Who-experiences-discrimination-in-Ireland-Report.pdf>.

^{xli} Ibid.

^{xlii} Kelleher et al. *All Ireland Traveller Health Study*, 2010.

^{xliii} All data from: "Roma in Ireland – A National Needs Assessment," Pavee Point Traveller and Roma Centre & Department of Justice and Equality, 2018, <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>