



## Submission to 88<sup>th</sup> Pre-Sessional Working Group (30 October – 3 November 2023) of the Committee on the Elimination of Discrimination against Women

### Suggested List of Issues for Ireland – Irish Travellers and Roma

#### Reporting Organisations

This report is submitted as a coalition of eight organisations which work towards achieving Traveller and Roma rights in Ireland. **Pavee Point**, founded in 1985, uses collective community development methods locally, nationally, and internationally to realise Traveller and Roma rights in Ireland. The **National Traveller Women's Forum**, founded in 1988, is a network of national Traveller women and Traveller organisations throughout Ireland that recognise the particular oppression of Traveller women in Irish society. **Minceirs Whiden** is Ireland's only all Traveller forum formed in 2004 with the aim of creating a safe place that Travellers could come together and discuss the issues affecting their community. **Donegal Travellers Project** was formed in 1996 and is one of the longest established and largest locally based community development organisations working for, and with, the Traveller and Roma communities. **Galway Traveller Movement**, established in 1994, aims to achieve equality and self-determination for the Traveller community in Galway by applying community work and human rights based approaches to its work. **Offaly Traveller Movement**, established in 1991, is a Traveller led community development organisation working to achieve full equality for the Traveller community throughout County Offaly. **Cork Traveller Visibility Group**, formed in the 1990's, is a Traveller-led, community development organisation committed to social justice and equality for Travellers in County Cork. Finally, **Wicklow Travellers' Group**, established in 2001, is a voluntary community development organisation committed to achieving human rights for Travellers in County Wicklow.

#### Our Submission

This submission highlights key human rights issues affecting Traveller and Roma women in Ireland, and respectfully suggests further information for the Pre-sessional Working Group to seek from the Irish State. The priority areas of concern require urgent attention in the light of persistent social exclusion, racism and discrimination faced by Traveller and Roma women. While we have welcomed the State's symbolic recognition of Irish Travellers as an ethnic group in 2017, we draw attention to areas where the previous Concluding Observations by the Committee have not been implemented or have only been partially progressed.

#### Irish Travellers and Roma in Ireland

It is estimated that Irish Travellers represent less than 1% of the nation's population. An estimated 16,049 Roma live in Ireland.<sup>i</sup> As minority ethnic women, Traveller and Roma women experience intersectional discrimination on the basis of ethnicity, gender and other grounds. As a result, Traveller and Roma women are among the most marginalised and excluded individuals and groups in Ireland.

#### For further information and to contact our Coalition:

Jenny Liston, Programme Manager, Pavee Point Traveller and Roma Centre  
[jenny.liston@pavee.ie](mailto:jenny.liston@pavee.ie), Tel: +353 018780255

## **1. Discrimination against Traveller and Roma women – Article 2**

### **1.1. National Action Plan Against Racism (NAPAR)**

We welcome the publication of a new and much needed National Action Plan Against Racism (NAPAR). NAPAR is a commitment to eliminating racism in all its forms in Ireland and we welcome the clear and early mention of Travellers as being directly covered by all provisions and recommendations in the plan. The plan also acknowledges that women, children and men experience dimensions of racism differently. In order to address anti-Traveller and anti-Roma racism, NAPAR must be afforded a sufficient budget and a clear implementation and monitoring framework; and be implemented in partnership with Traveller and Roma organisations.

### **1.2. Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022**

We welcome the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 which will legislate against hate speech and hate crime in Ireland. The Bill is now before Seanad Éireann (the Senate) for consideration. We particularly welcome that for the first time, the Bill includes Travellers as a minority ethnic group. The new proposed definition of incitement to hatred also goes further than the current legislation, which at present, has extremely low prosecution levels. For the legislation to be effective in preventing and addressing hate speech and hate crimes against minority ethnic groups it is necessary that the State rolls out special measures alongside the legislation.

### **1.3. Disaggregated Data by Ethnicity – Equality Data Strategy**

In line with state policies<sup>ii</sup> and legislation,<sup>iii</sup> and obligations under the EU disaggregated data initiatives, the State is in the process of developing an Equality Data Strategy and a system of ethnic data collection across state departments and agencies. While progress has been made with some state agencies,<sup>iv</sup> there have been major issues and resistance to progress ethnic data collection with others.<sup>v</sup> As a result, there is very little, if any, reliable statistical data on the situation of Travellers and Roma women.

#### **We respectfully suggest that the Committee ask the State:**

- a) What implementation and monitoring framework and resources will be afforded to the National Action Plan Against Racism, and how will it be delivered in partnership with Traveller and Roma organisations?
- b) What is the timeline for the enactment and full implementation of the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill and what plan is underway for complementary special measures, such as anti-racism training for criminal justice professionals, a public awareness campaign, disaggregated data on reported hate incidents and annual targets to reduce the numbers of hate crimes?
- c) To provide further information regarding progress, timeframe and resources for the full and effective development and implementation of an ethnic identifier and ethnic equality monitoring (in line with human rights standards) across all relevant state departments and agencies.

## **2. Guarantee of Basic Human Rights & Temporary Special Measures – Article 3 & 4**

### **2.1. National Traveller and Roma Inclusion Strategy 2017 – 2021 (NTRIS)**

As the State's statement of commitment and action in fulfilment of its obligations under the EU Roma Strategic Framework up to 2020-2030,<sup>vi</sup> we welcomed the development of the National Traveller Roma Inclusion Strategy (NTRIS) 2017 – 2021. However, we regret that the implementation of the Strategy was slow and lacked a robust implementation plan with clear targets, indicators, outcomes, timeframes, and budget lines.<sup>vii</sup> The State delayed the review and subsequent development of a successive strategy. We welcome the current consultation process for the successive Strategy, however, we await further details regarding implementation, monitoring and resourcing of the next NTRIS.

## **2.2. National Strategy for Women and Girls 2017 – 2021 (NSWG)**

For the first time, The National Strategy for Women and Girls (NSWG) 2017 – 2021 contained actions related to Traveller and Roma women. However, the actions relied solely on the implementation of gender actions in the National Traveller and Roma Inclusion Strategy (NTRIS). As NTRIS did not have an implementation plan, actions related to Traveller and Roma women in the NSWG were not progressed. In 2019, the Advisory Committee on the Framework Convention on National Minorities urged the State to implement the NTRIS and NSWG in a coordinated and consistent way, however this did not occur.<sup>viii</sup> Review of the NSWG was due to take place in 2021 and was delayed. No further information has been provided regarding the development of a successor Strategy.

### **We respectfully suggest that the Committee ask the State:**

- a) To provide an update on progress with developing the next iteration of NTRIS with a robust implementation and monitoring plan inclusive of clear targets, indicators, outcomes, timeframes and budget lines, as well as clear indication of the nature of the accountability of all government departments for achieving the objectives of the Strategy overall and for the actions included in their remits.
- b) To provide information regarding a timeframe for the development of the next NSWG, including information regarding the consultation process and the kind of implementation and monitoring framework and resources afforded to the forthcoming Strategy.
- c) To provide information on how actions relating to Traveller and Roma women in both the upcoming NTRIS and NSWG be implemented in a coordinated and effective way.
- d) To provide information on how the State will ensure the inclusion of Traveller and Roma women's voices and experiences in wider gender issues, research, and policy development by the state.

## **3. Participation in Political & Public Life – Article 7**

Actions outlined in the National Traveller and Roma Inclusion Strategy (NTRIS) and the National Strategy on Women and Girls (NSWG) have not materialised into measures to improve the representation of Traveller and Roma women in political institutions and decision making.<sup>ix</sup> At local level, there are no Traveller or Roma women councillors. At national level, the State has never elected a Traveller or Roma woman to either House of the Oireachtas. Senator Eileen Flynn was the first (and, to date, only) Traveller woman to serve in either House, following her nomination by the Taoiseach to the Seanad (the Senate) in 2020 on the back of much advocacy and campaigning. To date, no Roma woman has served as a national political representative.

The State is allocating Local Authorities increasing powers and roles in relation to local governance. This provides opportunities for the inclusion of Traveller and Roma women in participative democracy mechanisms. Actions outlined in the 2019 strategy 'Sustainable, Inclusive and Empowered Communities (A Five Year Strategy to Support the Community and Voluntary Sector in Ireland)' also provide potentially useful frameworks for supporting Traveller and Roma women's inclusion in local and issue based initiatives, and essential targeted support for Traveller and Roma initiatives.<sup>x</sup> These need to be realised in the action planning, implementation, and monitoring phases of this Strategy.

### **We respectfully suggest that the Committee ask the State:**

- a) What measures, targets, resources, and indicators will the State put in place to increase representation of Traveller and Roma women in political institutions and decision making at local and national levels?

#### **4. Education – Article 10**

The inequalities and exclusion faced by Traveller and Roma women and girls in education and early childhood education and care are long standing issues<sup>xi</sup> which were exacerbated during the COVID-19 pandemic. In 2017, the Committee raised concerns of low levels of education amongst Traveller and Roma women and girls. Since then, we have welcomed the explicit targeting of Traveller and Roma participation in higher education through the National Access Plan.<sup>xii</sup> However, none of the mainstream educational strategies contain actions at early years, primary or post-primary levels,<sup>xiii</sup> aimed directly at increasing Traveller or Roma women and girls’ participation. The State has now commenced a public consultation process for the development of a National Traveller and Roma Education Strategy, which is welcome, however this process has been significantly delayed.

#### **We respectfully suggest that the Committee ask the State:**

- a) To provide information regarding the development of the Traveller and Roma Education Strategy including a timeframe for development, implementation and monitoring framework and associated resources.<sup>xiv</sup>

#### **5. Employment & Economic and Social Benefits – Article 11 & Article 13**

##### **5.1. Traveller and Roma Employment**

High levels of unemployment persist amongst Travellers and Roma women due to low education attainment, discrimination, childcare and family commitments, and being placed in a poverty trap due to social welfare issues. We regret that Traveller and Roma women have not been named as target groups in key mainstream employment policy initiatives, and no dedicated strategy has been developed to address the significant levels of discrimination in employment faced by Travellers and Roma women. We welcome that the State has committed to the development of a Traveller and Roma Training and Employment Plan. However, there has been no progress in relation to this to date.

##### **5.2. Application of the Habitual Residence Condition (HRC)**

We remain deeply concerned that many Roma women and children are being left outside of basic social protections. Despite Child Benefit being a ‘universal’ payment in Ireland, many Roma children are not entitled to it due to the implementation of the right to reside (European Directive 2004/38) and the associated policy - Habitual Residence Condition- by the Department of Employment Affairs and Social Protection.<sup>xv</sup> The Roma Needs Assessment found that 49.2% of households with children were unsuccessful in their application for social protection payments, and therefore were not receiving Child Benefit. Roma women who are unable to satisfy their right of residence and the habitual residence condition (HRC) are unable to exit violence and access essential emergency and long-term supports, including public housing, housing benefits or basic income supports.<sup>xvi</sup>

In 2017, the Committee recommended the State to assess the impact of the habitual residence condition for Roma women. Despite the Committee’s recommendation, the State has not reviewed the HRC, nor has it taken adequate steps to ensure it is consistently applied by the relevant officials. Concerns about the discriminatory effect of the HRC on Roma access to basic social protections have been raised by other international human rights bodies.<sup>xvii</sup>

#### **We respectfully suggest that the Committee ask the State:**

- a) To indicate its plan and timeframe to develop a comprehensive Traveller and Roma Training, Employment and Enterprise Strategy in an effort to combat the chronic unemployment levels impacting Traveller and Roma women.

- b) To provide information on measures taken to ensure that all Roma women and children residing in the State, can access Child Benefit payments regardless of the legal or administrative status of their parents.
- c) The State has undertaken a special measure to regularise the status of people living in Ireland long term without papers – can the State consider undertaking a similar measure for EU citizens who have resided in the State for a number of years but do not have all the relevant documentation?

## **6. Health – Article 12**

### **6.1. Traveller Women’s Health**

There are poor health outcomes for Traveller women due to structural inequalities and failure to address the social determinants of health, including poor accommodation conditions, poverty, low literacy levels and discrimination. The mortality rate for Traveller women is three times the rate of the general population, and suicide for Traveller women is 5 times higher than the general population.<sup>xviii</sup> We welcome the publication of the National Traveller Health Action Plan (NTHAP) 2022 - 2027 and associated implementation mechanisms and resources. This is an ambitious plan and holds potential to have an impact on Traveller health experiences and outcomes, if fully resourced and implemented. This is the first policy document that has a specific focus on Traveller health since the National Traveller Health Strategy 2002-2005. There is an urgent need for an ethnic identifier to be rolled out and health indicators developed to monitor and identify Travellers’ access, participation, and outcomes in health, as well as the timely establishment of a National NTHAP Implementation Group.

### **6.2. Roma Women’s Health**

Roma women experience significant barriers to accessing primary health care due to lack of sufficient income, high cost of health care and lack of interpretation and translation services. Many Roma women, who do not have an income or have difficulties with proving where they live, cannot access means tested Medical Cards. As a result of the COVID-19 pandemic and the recognition of the urgent need to address Roma health inequalities, a positive development in this area has been the funding of health-workers working with Roma. To be effective, this model requires Roma health posts across the country and a nationally coordinated approach based on the social determinants of health and strong links with mainstream services.

### **6.3. Traveller and Roma Women Maternal Health**

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

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

**We respectfully suggest that the Committee ask the State:**

- a) What are the States plans with regards the implementation and sustainable resourcing of the NTHAP, and what is the timeframe for the establishment of the NTHAP National Implementation Group?
- b) To provide information on its plan to develop a Traveller and Roma Mental Health Strategy as committed to in the Programme for Government.
- c) What steps will the State take to strengthen the Roma health infrastructure and ensure a coordinated approach to address the stark health inequalities faced by Roma women and difficulties in accessing basic healthcare?
- d) What are the States plans to address the inequalities and barriers that exist for Traveller and Roma women in relation to maternal health?

**7. Violence against Women**

Traveller and Roma women experience significant barriers to exiting violence and seeking safety and protection from domestic, sexual, gender-based violence (DSGBV). Actions in the Second National Strategy on Domestic, Sexual and Gender-based Violence (NSDSGBV) 2016 - 2021 related to Traveller and Roma women were not adequately implemented or resourced. We welcomed the funding of a small Traveller Domestic, Sexual and Gender-based Violence Pilot Project 2019-2021 which was mainstreamed in 2022.

The Third National Strategy on DSGBV 2022 - 2026 acknowledges the additional barriers that Traveller and Roma women face exiting violence. However, little progress has been made so far with actions naming Traveller and Roma women, and the associated implementation plan lacks clear targets, indicators, outcomes or allocated budget. The Strategy commits to the establishment of a dedicated DSGBV agency by 1<sup>st</sup> January 2024, with responsibility for resourcing and supporting the DSGBV sector.<sup>xxiv</sup> While this may be a positive development, we are deeply concerned how this move in implementation and funding may impact existing targeted projects, such as the Traveller Domestic, Sexual, Gender-based Violence Project.

**We respectfully suggest that the Committee ask the State:**

- a) To provide information on the development of an implementation plan for the Third National Strategy on DSGBV with targets, indicators, outcomes, timeframes and resources.
- b) To provide confirmation that resourcing of targeted initiatives for Traveller and Roma women will continue following the establishment of the DSGBV agency.

**8. Detention**

Although Travellers account for 0.6 % of the Irish population, Travellers account for 22% of the female prison population.<sup>xxv</sup> Short custodial sentences or being placed on remand, can have a detrimental impact on the family life for Traveller women particularly where they are primary carer's or in one parent families to ensure family links are not broken. In 2017, the Committee recommended for the State to address the root causes of the overrepresentation of Traveller women in places of deprivation of liberty, as well as address the standard of conditions in prisons. To date, no measures have been put in place to address the overrepresentation of Traveller women and girls in prison and/or detention centres.

**We respectfully suggest that the Committee ask the State:**

- a) To provide information about measures taken to address the over-representation of Traveller and Roma women and girls in prison and detention.

## 9. Accommodation

The persistent and deteriorating accommodation crisis among Travellers and Roma has been exacerbated by Ireland's ongoing housing and homeless crisis.<sup>xxvi</sup> Traveller and Roma women spend more time at home and bear the brunt of the impact of poor and unsafe accommodation conditions.

### 9.1. Traveller Accommodation

Research shows that 39% of Travellers meet the European definition of homelessness (European Typology of Homelessness and housing exclusion-ETHOS) as this includes the large number of Travellers who are experiencing 'hidden homelessness' in overcrowded living conditions. This is compared to 6% of the general population.<sup>xxvii</sup> Significant gaps remain in the delivery of new Traveller specific accommodation.

In 2019, an Independent Expert Group on Traveller Accommodation made 32 recommendations for the Government and a Programme Implementation Board has since been established to progress the implementation of the recommendations. However, implementation has been slow - 6 of the 32 recommendations have been completed and there are currently no timelines or supports identified for progressing the remaining recommendations.

### 9.2. Roma Accommodation

Roma women face discrimination in accessing accommodation; severe overcrowding; poor and dangerous accommodation conditions; homelessness; and lack of access to social housing and housing assistance payments.<sup>xxviii</sup> While the State has indicated a commitment to include Roma specific housing actions in the National Traveller Roma Inclusion Strategy (NTRIS) 2017 - 2021, there are currently no such actions in the NTRIS.

#### **We respectfully suggest that the Committee ask the State:**

- a) To provide information regarding progress in implementing the Traveller accommodation recommendations being overseen by the Programme Implementation Board.
- b) To outline the timeline, supports and resources for fully implementing all the recommendations made by this Expert Group.
- c) To provide information on how the State plans to address Roma accommodation in the next NTRIS.
- d) Considering the State has taken no action to address the housing crisis among Roma, can the State provide information on how the State plans to address Roma accommodation in the next NTRIS?

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<sup>i</sup> Census 2022.

<sup>ii</sup> As per the National Traveller and Roma Inclusion Strategy (2017-2021); Second National Strategy on DSGBV; Migrant Integration Strategy 2017-2020; The National Strategy for Women and Girls 2017-2020.

<sup>iii</sup> Obligations set out in Section 42 of the Irish Human Rights and Equality Act (2014).

<sup>iv</sup> The Central Statistics Office has included Travellers as an administrative category in the Census since 2006, and Roma will be included in Census 2021. Progress has also been made with ethnic data collection with National Social Inclusion Programmes.

<sup>v</sup> The national police service (An Garda Síochána) and the Courts Service report 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.

<sup>vi</sup> European Commission, '[Commission launches new 10-year plan to support Roma in the EU](#)', 7 Oct 2020.

<sup>vii</sup> UNCEDAW, *Concluding Observations on the Combined Sixth and Seventh Periodic Reports of Ireland*,

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

viii FCMN, 2019.

ix Some initiatives are currently supported in voter education and registration in the Traveller community.

x Government of Ireland (2019) Sustainable, Inclusive and Empowered Communities (A Five Year Strategy to Support the Community and Voluntary Sector in Ireland)\* <https://assets.gov.ie/26890/ff380490589a4f9ab9cd9bb3f53b5493.pdf>

xi 60% of Travellers of Junior-Cycle age and 30% of Senior-Cycle age are enrolled in post-primary schools (2018-2019) and less than 1% of Travellers are in third level education

xii HEA (2022) National Access Plan: A Strategic Action Plan for Equity of Access, Participation and Success in Higher Education 2022-2028 .

xiii Including Delivering Equality of Opportunity in Schools Plan 2017.

xiv In 2019, the Advisory Committee on the FCNM and the CERD Committee urged the State to adopt a coherent Traveller and Roma Education Strategy and an implementation plan with clear targets, indicators, timeframes and resources, in FCNM, 2019; UNCERD, 2019.

xv 40% of Roma households with children are not successful in applying for social protection payments. Under the European Directive Roma have a right of residence without restriction for three months. 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, Job Seekers Allowance, Rent Allowance, public housing, and employment and training supports. Roma face significant difficulties with proving residency in the State with lack of documentation, proof of address and language and literacy skills. 25.5% of Roma don't have the right to reside; 25.7% of Roma are not habitually resident; 38.5% of Roma don't know if they have a right to reside; 26.9% don't know if they are habitually resident. Curran et al., *National Needs Assessment*, 2018.

xvi Women's Aid, Women's Aid input into FLAC Shadow Report under the International Covenant on Economic, Social and Cultural Rights, 2014, [https://www.womensaid.ie/download/pdf/womens\\_aid\\_input\\_to\\_flac\\_icescr\\_shadow\\_report\\_may\\_2014.pdf](https://www.womensaid.ie/download/pdf/womens_aid_input_to_flac_icescr_shadow_report_may_2014.pdf).

xvii UNGA, *Report of the Special Rapporteur on Extreme Poverty and Human Rights*, Magdalena Sepúlveda Carmona, A/HRC/20/25, 2012, para 102; European Commission against Racism and Intolerance, ECRI *Report on Ireland Fourth Monitoring Cycle*, CRI (2013)1, 2013, para 130; UNCEDAW, 2017; UNCRC, 2016; HRC, 2014; UNCESCR, 2015.

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

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

xx Kelleher et al., 2010.

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

xxii Pavee Point (2023) Le Romneango Sfato Roma Women's Voices: Experiences of Maternal Health Services in Ireland.

xxiii Ibid.

xxiv Department of Justice, *Dedicated State agency to oversee and support dramatic increase in refuge accommodation under new legislation from Minister Harris*, 2023, <https://www.gov.ie/ga/preasraitis/040e0-dedicated-state-agency-to-oversee-and-support-dramatic-increase-in-refuge-accommodation-under-new-legislation-from-minister-harris>.

xxv Irish Prison Service , cited in Lalor, T., *Travellers in Prison Initiative: Ethnic Identifiers in Irish Prisons*, 2017.

xxvi 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/presstatementcensus2016resultsprofile8-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.

xxvii Pavee Point, *The Traveller Community and Homelessness*, 2021.

xxviii The application of the Habitual Residence Condition (see section 2.3) and the Housing Circular 41/2012 is precluding many Roma from accessing a range of social welfare supports, including housing and homeless supports. Curran et al., *National Needs Assessment*, 2018.