Joint Submission to DoE - Review of the 2013 Action Plan on Bullying and the review of the 2013 Anti-bullying Procedures for Primary and Post-primary Schools

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(Submitted through online survey platform)

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**Section 2. Please outline your observations and comments on how the existing Action Plan on Bullying and Anti-Bullying Procedures for Schools (2013) has supported schools to prevent and tackle bullying (**20000 characters)

Bullying is not the only discrimination experienced by Travellers and Roma in the education system but it is a serious and ongoing issue that needs coordinated action and responses. It is of crucial importance that an Action Plan on Bullying and associated procedures are developed, implemented and monitored. However, from existing research and data, as well as from anecdotal evidence and experience by our organisations we are aware that the existing measures have fallen short in meeting the needs of Traveller and Roma children in relation to racist, identity-based and sexual bullying. These forms of bullying can be a significant push factor in some Traveller and Roma children disengaging from school, as illustrated by the statistics below. To this end, our organisations welcome this consultation and put forward a number of recommendations for action to address the bullying experienced by Traveller and Roma children in schools.

* 60% of Travellers of Junior-Cycle age (12-15 year olds) and 30% of Senior-Cycle age (15-18 year olds) are enrolled in post-primary schools (2018-2019).
* In the 2016 Census about 20% of Travellers aged 20-24- years registered as having completed Senior Cycle.

Section 3. Can you provide any relevant recent statistics or research in relation to bullying/anti-bullying that you would like to bring to the attention of the Steering Committee?

**“Out of the Shadows - Traveller and Roma Education - Voices from the Communities” NTRIS Pilot Baseline Research Report. Dr. Maria Quinlan 2021**

<https://1d3ad8c0-4fe5-46e5-9b07-dc213044ac84.filesusr.com/ugd/5cfafe_0dc001ab34414419b855ebe82b7890f1.pdf>

* Traveller parents reported that their children experience exclusion and racist name-calling, which often makes them feel unsafe and unwanted in school.
* Traveller parents reported their experience overall is that their children are treated differently, more negatively, because they are from the Travelling community.
* The majority of Traveller and Roma students said that bullying, and racist name-calling is not taken seriously when they report it to school staff.
* In response to a direct question in relation to bullying in the last year - bullying by teachers was also cited as one of the most frequent types of bullying that Traveller students experienced. Bullying by teachers took place in the classroom and Traveller pupils described teacher behaviour that was demeaning and made them feel unwanted and excluded.

**“A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils’ experiences in the school system” Dr. Maeve Dupont 2022**

<https://antibullyingcentre.b-cdn.net/wp-content/uploads/2022/03/A-study-into-the-effectiveness-of-the-Anti-Bullying-Procedures-on-Traveller-and-Roma-pupils-experiences-in-the-school-system.pdf>

* 12.% of Travellers surveyed indicated that they had been bullied by teachers several times a week at some point in the past year, including verbal abuse and exclusion.

**Yellow Flag Programme Data Set 2022**

Between January 2022 and April 2022, 9 new entrant schools took part in the Yellow Flag Programme anonymous survey to gauge inclusion challenges in their school communities. A total of 1,897 students across 7 post primary and 2 primary schools responded to the survey. The findings below are of the 491 students who identified as ethnic minority only.

Feelings of Belonging in School among Ethnic Minority Students.

When asked whether they see their cultural identity reflected in the classroom and learning materials:

* 28% responded not really, and 19% said not at all
* 10% reported that they cannot really be open about their cultural identity in school
* 6% responded that they do not really feel included in school

Experiences of Racism in School

* 47% reported having witnessed racism in school
* 22% reported having directly experienced racism in school

Reporting Racist Incidents in School

* 73% who said they had directly experienced racism in school did not report the incident to school staff or a teacher

When asked why they did not report:

* 30% did not think it was serious enough to report to the school
* 29% did not think the school would take it seriously
* 11% did not feel confident speaking to a teacher or member of staff about it

**Joint Committee on Education, Further and Higher Education, Research, Innovation and Science “School Bullying and the Impact on Mental Health” August 2021**

<https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_education_further_and_higher_education_research_innovation_and_science/submissions/2021/2021-08-23_report-on-school-bullying-and-the-impact-on-mental-health_en.pdf>

* References to submissions that highlight the need to include all the forms that bullying can take, including the impact that ethnicity-based bullying can have on ethnic minorities such as members of the Traveller community.
* Reccomends The Department of Education to publish updated Procedures for Primary and Post-Primary Schools based, with specific actions to address homophobic, transphobic, disability and racist bullying behaviours.
* In oral evidence on 4 May 2021, Dr Niall Muldoon, Ombudsman for Children, requested that “disaggregated data should be compiled by the State regarding cases of bullying and harassment in schools”.
* Irish Medical Organisation (IMO) warned “that bullying is associated with higher levels of anxiety and depressive symptoms, suicidal intentions, and suicide attempts, with adolescents who had been bullied 6.6 times more likely to report having attempted suicide compared to their peers”.

Submitting organisations are very concerned by this evidence presented by IMO given the already very serious mental health issues within the Traveller community. The Traveller suicide rate is 6 times higher when compared to the general population and accounts for approximately 11% of all Traveller deaths. Suicide for Traveller men is 7 times higher and most common in young Traveller men aged 15-25. Suicide for Traveller women is 5 times higher than the general population. (All Ireland Traveller Health Study 2010).

**Pavee Point Traveller and Roma Centre & Department of Justice and Equality, National Roma Needs Assessment, 2018**

<https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

* Highlights how Roma respondents had to hide their identity to prevent or protect themselves against bullying and discrimination, both by peers and by school staff.
* Lack of Roma culture and history in formal curriculum, and the lack of appropriate curriculum-linked resources to support its inclusion, are also found as gaps.

**Department of Children and Youth Affairs, State of the Nation’s Children, 2014**

<https://www.tusla.ie/uploads/content/SONCReport2014.pdf>

* When compared to other children, Traveller children, immigrant children and children with a disability and/or chronic illness were more likely to report that they were bullied at school.

Section 4. Can you provide information on what you think is missing or needs strengthening in the 2013 Action Plan on Bullying

**Linkage to other policy measures:**

* Implement and monitor the next Action Plan on Bullying in coordination with other key policy measures and strategies, particularly the forthcoming National Action Plan Against Racism, National Traveller and Roma Inclusion Strategy, 3rd National Strategy on DSGBV and the National Strategy on Women and Girls.

**A clear framework for addressing Traveller education disadvantage:** In recognition that bullying against Travellers and Roma in schools is a complex issue associated with other forms of discrimination and exclusion, it is crucial that a comprehensive strategy is put in place to address the educational disadvantage and experiences of Travellers and Roma overall. System change is an essential pre-requisite to ensure that education is inclusive of and ambitious for Traveller and Roma students, and encourages their access, participation, and outcomes to the highest level. To this end:

* Immediately develop and implement the programme for government commitment of a National Traveller Education Strategy and implement the National Traveller Education Strategy in a coordinated fashion with the Action Plan against Bullying.

**Implementation and monitoring framework:**

* Ensure the next Action Plan against Bullying has a robust implementation and monitoring framework with clearly defined actions, targets, indicators, outcomes and budget lines for addressing racist, identity based and sexual/sexist bullying against Traveller and Roma pupils/students

**Inclusion of Travellers and Roma and Definitions of Bullying, Ethnicity and Racism:**

* Include explicit reference to bullying based on membership of the Traveller community and the Roma community in the Action Plan against Bullying.
* Provide a clear and comprehensive definition of bullying that includes racist bullying, identity-based bullying, sexual/sexist bullying and online bullying, as well as the intersection of bullying based on experiencing bullying on a number of different identity grounds and through different mediums, including online and offline bullying. Also provide a clear definition of ethnicity, racism (including a definition of anti-Traveller and Roma racism), discrimination, sexism, sexual harrassment and abuse, including cyber violence against girls.
* Develop specific actions to address racist bullying behaviours.

**Collection, analysis and use of disaggregated data and in-depth research on the experience of bullying among Travellers and Roma:**

* Collect, analyse, use and publish data on incidences of bullying in Primary and Post Primary schools, including racist bullying, sexual/sexist and identity-based bullying. The data should also record the nature of the bullying, the remedies and the outcomes. In order to do this, ensure data collection by ethnicity and gender in schools takes place in line with human rights standards and that such data is published and used by the Department of Education.
* Undertake comprehensive research on racist, sexual/sexist and identity-based bullying against Traveller and Roma pupils and students. Adopt peer-led research approaches and methodologies to such research ensuring Traveller and Roma organisation are included in all aspects of the research process to ensure its success
* Inform the development of anti-bullying policy on an ongoing basis through up to date disaggregated data.
* Conduct specific Anti Bullying Inspections by the inspectorate on a regular basis in all schools as recommended by the Joint Committee on Education, Further and Higher Education, Research, Innovation and Science.

**Teacher Bullying:**

In recent research 12 % of Travellers surveyed indicated that they had been bullied by teachers several times a week at some point in the past year, including verbal abuse and exclusion (Dupont 2022). It is an issue named consistently by Travellers in education consultations conducted by our organisations. Given the power imbalances between a teacher and a student, particularly when the teacher is from the majority population and the student is from a minority, greater efforts must be made to address this.

* Strengthen the guidance in the new Action Plan on Bullying on Teacher Bullying and identify clear and robust measures to address it.

**Inclusion of Travellers, Roma and anti-racism in the whole School Community and environment**

Ensuring anti-racist policies and practises and positive visibility of Traveller and Roma cultures in the whole school environment is critical in mitigating against racist and identity based bullying for Traveller and Roma children and supports both retention and a sense of belonging.

* Ensure all schools develop,implement and monitor an anti-racism policy and a whole-school strategy to combat racism and promote an anti-racist school culture.
* Review Initial Teacher Training (ITE) and Continuing Professional Development (CPD) for primary and post primary teachers and ensure initial and ongoing teacher training includes mandatory modules on anti-racism, equality and intercultural awareness.
* Embed intercultural education within the primary and post primary curricula, to ensure the identity of all students is reflected in classroom learning. Specifically ensure that Traveller culture and history are embedded in curriculum and that these are mandatory aspects of formal curriculum.
* Develop and use curricular programmes to promote anti-racism, respect, belonging, inclusion, consent/ sexual violence prevention and ensure these are mandatory in terms of teaching curriculum and participation by students.
* Develop targeted actions to address the particular experience of bullying among Traveller and Roma students.
* Undertake special measures and targets to train and recruit Travellers and Roma as teachers in Primary and Post Primary schools, including Return to Learning education for Travellers and Roma and removing criteria that act as barriers to entering teacher education, particularly the Irish language requirement.
* Ensure the inclusion of Traveller and Roma students and their parents/guardians throughout the structures of the school community.

**Supports:**

* Develop and adequately fund the resources required for a model of mental health support service for those who experience bullying in schools.
* Ensure that the supports are robust, easily accessible and culturally appropriate in order to meet the needs of Traveller and Roma students.
* Raise awareness about bullying with all school staff (not just teachers), parents/guardians and students, including regarding how to identify and report racist bullying and other forms of bullying and abuse, as well as how to access relevant services and supports, such as mental health supports or reporting cyber violence to An Garda Síochána.
* Provide ongoing training for school staff regarding identifying, responding and referring/reporting bullying in all its forms.

**Online bullying:**

Cyberbullying among Irish children increased by 28% during lockdown (the highest rates in Europe) according to a joint study between the European Commission and DCU. Schools have aresponsibility to protect their most vulnerable students from online harmful content. Cyber violence against girls is a particular concern, particularly image-based sexual abuse. There are specific barriers for Traveller and Roma girls and/or their parents to recognise and/or report such abuse and violence due to low levels of awareness of cyber violence against girls, lack of trust in authority figures and reporting/complaint mechanisms, amongst others. Cyber violence against Traveller and Roma girls can also often intersect with racist bullying or harassment, further compounding the experience and impact of bullying, abuse and violence among Traveller and Roma girls.

* Develop and implement policies, practises and training for school staff on how to tackle cyberbullying in schools, including racist hate speech online and cyber violence against girls. Ensure such policies, practices and training raise the awareness and capacity of school staff regarding how to recognise and respond to students who may experience specific barriers to disclosing and reporting cyberbullying and cyber violence against girls.
* ​​Ensure awareness raising and capacity building with all school staff, students and parents regarding upcoming legislation on hate speech and crime, as well as the protections and offences under the Harassment, Harmful Communications and Related Offences Act 2020 particulalry as they relate to image-based sexual abuse.
* Establish the Online Safety Commissioner as recommended in Joint Committee on Education, Further and Higher Education, Research, Innovation and Science “School Bullying and the Impact on Mental Health” August 2021.
* Introduce prompts/warnings across all online platforms when accessing posts if there is bullying or racist content (similar to the warnings in relation to COVID-19 posts).

Section 5. Can you provide information on what you think is missing or needs strengthening in the 2013 anti-bullying procedures for primary and post-primary schools

1. Include explicit reference to bullying based on membership of the Traveller community and the Roma community in school anti-bullying procedures.
2. Provide a clear and comprehensive definition of bullying that includes racist bullying, identity-based bullying, sexual/sexist bullying and online bullying, as well as the intersection of bullying based on experiencing bullying on a number of different identity grounds and through different mediums, including online and offline bullying. Also provide a clear definition of ethnicity, racism (including a definition of anti-Traveller and Roma racism), discrimination, sexism, sexual harrassment and abuse (including cyber violence against girls ).
3. Collect, analyse, use and publish data on incidences of bullying in Primary and Post Primary schools, including racist bullying, sexual/sexist and identity-based bullying. The data should also record the nature of the bullying, the remedies and the outcomes. In order to do this, ensure data collection by ethnicity and gender in schools takes place in line with human rights standards and that such data is published and used by the Department of Education.
4. Identify barriers to disclosing bullying and address these in an ongoing manner in order to address the under-reporting of bullying in schools. Update procedures as necessary.
5. Ensure culturally appropriate support is put in place for Traveller and Roma students experiencing bullying.
6. Promote and publicise the anti-bullying procedures through class, school based and community activities throughout the school year with students and with their families. Ensure those activities include and share an analysis of bullying that includes racist bullying as experienced by Traveller and Roma students.Strengthen anti-bullying procedures in order to address the serious issue of teacher bullying particularly as it impacts on Traveller and Roma students. Consideration must be given to the most suitable adult in the school community to report teacher bullying to. Consideration must also be given to addressing the concerns of Traveller and Roma students and their families who will fear victimisation when reporting teacher bullying.
7. Consider and set out criteria for an anti-bullying officer as a designated role in school. The staff member must have the time, skills, seniority and capacity to follow up on reported incidents. (The Principal is often the one who takes on this role currently - we believe that they do not have the time to dedicate to this important role or may not be the most appropriate person in the school.)