



PAVEE POINT
TRAVELLER AND ROMA CENTRE

Submission to the Central Statistics Office (CSO) from Pavee Point Traveller and Roma Centre

Proposals for the Improved Inclusion of Irish Travellers and Roma in Census 2027:

- Tackling under-enumeration of Travellers and Roma in Census 2027
- Retaining and evolving the ethnic group question (Q11) from an equality perspective
- Improved inclusion of Travellers and Roma in censuses and non-census CSO equality surveys and reports
- Challenges arising from the proposed online census form enumeration for Census 2027
- Good practice and insights from the Censuses of Australia 2016 and 2021 related to this submission (case study)
- An Equality/Hybrid approach to Census 2027



“Data on ethnic..and indigenous identity can help render certain minorities statistically visible, and expose potential discrimination and inequalities.”

OECD REPORT, 2018 ¹

“If we are not counted, we do not count.”

PAVEE POINT, 2023

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¹ Organisation for Economic Co-operation and Development (2018). Diversity Statistics in the OECD. How do OECD countries collect data on ethnic, racial and indigenous identity. SDD Working Paper No. 96

Introduction

Progress and continuing challenges

We preface this submission by acknowledging the longstanding relationship between Pavee Point Traveller and Roma Centre (Pavee Point) and the Central Statistics Office (CSO) for over 30 years and look forward to continuing this positive and valued interaction.

This relationship has contributed to significant positive changes in the censuses of Ireland over the past two decades. Data from successive censuses, particularly over the past decade has helped illuminate the major inequalities that continue to exist in the demographic and socio-economic status of Travellers and Roma compared with the general population of Ireland.

However this submission contends that more can and should be done to highlight these inequalities and further, to address the known population under-enumeration experienced by Travellers and Roma in Ireland in both census and non-census CSO reports.

This submission proposes that Census 2027, and future censuses, should retain the ethnic group question. The primary rationale for this ethnicity question is for equality purposes but it sometimes misunderstood as a sociological or cultural question. This equality rationale is discussed in this submission. The rationale would be made clearer if Census 2027 was explicitly underpinned by the Public Sector Equality and Human Rights Duty. This is a statutory obligation for public bodies in Ireland as a consequence of equality legislation enacted in 2014. Such an approach has been adopted in the UK by the Office for National Statistics (ONS). The UK has a similar Equality Duty.

To date there remains almost no reliable data on the demographic and socio-economic status of the Roma community in Ireland, despite evidence of their poor and marginal status in Irish society. In this context, Pavee Point welcomes the inclusion by the CSO of 'Roma' as a specific response option in the ethnic group question (Q11) of Census 2022.

We await publication of the relevant data from Census 2022 on Travellers and Roma but predict that further positive actions will be needed to optimise the inclusion of both Travellers and Roma in future censuses in Ireland. We also call for the publication of preliminary data on ethnicity as rapidly as possible. Early publication is evident in the Australia case study in this submission. This action would provide some data earlier than at present. There are 11 Profiles in Census 2016 and Travellers are currently part of Profile 8. It is as yet unclear what the Profiles will be for Census 2022.

The stated ambition of the CSO is to develop an online census enumeration form for 2027 is discussed in this submission. There are of course many reasons why this makes sense from a general public policy and cost perspective and it will likely be generally welcomed in Ireland by those who are computer literate, who can afford the necessary IT devices and who have adequate access to broadband.

However there are significant concerns that the Traveller and Roma communities will be disadvantaged (along with other communities in Ireland) by this development if a primarily online enumeration methodology is not fully thought through or is inadequately implemented or is under-resourced. The experience from the 2021 Census of Australia is that 21% of the entire population continued to opt for the traditional/field approach to census enumeration.

In short, many of those with poor literacy and digital skills, or those without access to adequate broadband, including Travellers and Roma, will continue to require a traditional/field approach to Census enumeration and this must be carefully included in the planning for Census 2027. An Equality/Hybrid model of census enumeration for 2027 in Ireland is advocated in this report, but this also requires further dialogue not only with Pavee Point but with other organisations, such as NALA.

Australia has a significant 'First Nation' minority population and was one of the first countries to implement an online census enumeration system in Census 2016. Insights into this experience are included as a case study in this submission. Australia has also developed an interesting methodology of adjusting its data (post census) to take into account the continued under-enumeration of their First Nation peoples. We would urge the CSO to adopt a similar approach for Ireland in respect of Travellers and Roma.

The tone of this submission is, as always, forward looking and constructive. We are aware of the ongoing challenges of fully including Travellers and Roma in censuses. However we would also point to the significant improvement in the enumeration of Travellers over the decade 2006-2016 as a consequence of positive actions by the CSO, in partnership with Pavee Point and we wish to maintain this momentum going forward to 2027.

Finally, we would welcome the opportunity of further meetings with the CSO and we would request consideration of representation on the Census Advisory Group, to elaborate on this submission and to further seek additional resources to optimise Traveller and Roma participation in Census 2027 and other non-Census CSO equality reports.



Martin Collins

Co-Director, Pavee Point
Pavee Point Traveller and Roma Centre



Lynsey Kavanagh

Co-Director, Pavee Point
Pavee Point Traveller and Roma Centre

Structure of this submission

Pavee Point Traveller and Roma Centre welcomes the forthcoming review of Census 2027, as signalled in the public consultation process announced by the Central Statistics Office (CSO) that concludes in January 2023.²

We contend that the review in advance of Census 2027 provides a key opportunity to improve the participation and outcomes from the Census for Traveller and Roma communities in Ireland.

Structure of this submission

Section 1 provides the rationale to enhance Traveller and Roma inclusion in Census 2027 with reference to national and international guidance on Travellers and Roma and equality and censuses. It further advocates greater efforts by the CSO to explain the rationale of the ethnic group question Q11, Census 2022.

Section 2 provides a focus on the enhanced potential of non-census CSO equality reports to include Travellers and Roma on a more systematic and structured basis.

In section 3, Australia is provided as a case study with a focus on under-enumeration of minorities and the overall challenges of introducing an online system, with potentially important lessons and understanding for Ireland.

Section 4 provides a summary of high level recommendations arising from this submission and proposals for an equality/hybrid approach to Census 2027 in Ireland.

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² CSO Press Release (30 November 2022).
<https://www.cso.ie/en/csolatestnews/pressreleases/2022pressreleases/pressstatementcensus2027publicconsultation/>

Section 1:

Why we need to enhance Traveller and Roma inclusion in all aspects of Census 2027

This section provides the rationale to enhance Traveller and Roma inclusion in Census 2027 and non-census equality reports administered by the CSO. This rationale underpins this entire submission. This section makes reference to Ireland's national and international obligations and includes a review of the available literature related to standards and census methodologies from the United Nations.

Travellers and Roma are among the most disadvantaged groups in Ireland

Census 2016 provides important data on the inequalities experienced by Travellers, compared with the general population in Ireland.³ Profile 8 of Census 2016 is titled 'Irish Travellers, Ethnicity and Religion'.

As an example of the extent of this disadvantage, the education and employment commentary in Census 2016 provides two important indicators on the inequality experienced by Travellers in Ireland and provides an insight into why Traveller and Roma inclusion in the Census 2027 needs to be enhanced.

Extract from Profile 8 of Census 2016:

Education

Educational attainment among Travellers continues to lag significantly behind that of the general population. Among Traveller females, just 13.3% were educated to upper secondary level or above, compared with almost 7 in 10 (69.1%) of the general population. Nearly 6 in 10 male Travellers (57.2%) were educated to primary level at most, compared with just 13.6% of the general population. The 167 Travellers with a third-level qualification was almost double the 2011 figure of 89.

Employment/Unemployment

While 10,653 Travellers were in the labour force, the vast majority, 8,541 (80.2%), were unemployed. Almost 1 in 8 Travellers (11.3%) stated that they were unable to work due to a disability, which was almost three times the rate of the general population (4.3%).⁴

From a Pavee Point perspective, some of the current information in Profile 8 is more relevant than others. At present, there is also only some inclusion of data disaggregated by gender and ethnicity in the Profile reports (see CERD concerns in this submission).

³ Data from Census 2022 on Travellers and Roma has not yet been published.

⁴ CSO (October 2017). Press Statement Census 2016 results Profile 8. Irish Travellers Ethnicity and Religion.

There are also some key omissions in the points highlighted, such as a focus on the high levels of infant mortality or the small number of people living over the age of 65. A further discussion on Profile 8 is requested by Pavee Point in this submission.

Other general aspects of the Census, including for example on health could also be expanded upon in the reports arising from Census 2022. We welcome the added health focus of Q15,16 and 17 in Census 2022 which applies to the whole population of Ireland. Pavee Point would welcome disaggregation of Q15, 15 and 17 in Census 2022 from a Traveller and Roma perspective, including by gender. The Census of Australia also considered chronic health conditions in Census 2021 and this may be useful for future health questions for Census 2027 in Ireland. This would support the government in its approach to population-based health planning.

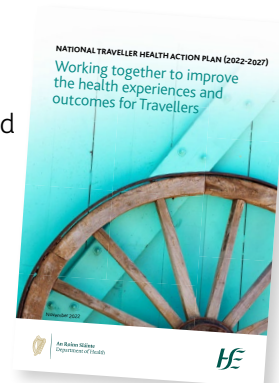
The generation of more data/reporting disaggregated by gender should also be considered for 2027. This was highlighted in the latest UN CERD report for Ireland (2020).⁵

The under-enumeration of Travellers and Roma in censuses and the challenge for 2027

A key equality issue identified in this submission is the continued under-enumeration of Travellers and Roma in Ireland. This is an issue that is also considered in Section 4 of this submission, with lessons drawn from our case study of Australia.

According to Census 2016 (which is the latest available data) there were 30,987 Travellers in the Republic of Ireland, accounting for 0.7% of the Irish population.

However, the 'All Ireland Traveller health Study' undertaken by UCD in 2010 established the Traveller population at 36,334 in 2010. Additionally, the most recent annual Traveller family count 2021 undertaken by the Department of Housing, Local Government and Heritage (DHLGH) reports that there are 11,680 Traveller families in Ireland. Given that the average Traveller family size is 5.3 (CSO Census 2016), this is equivalent to 61,904 Travellers or 1.2% of the overall population (as per preliminary figures, CSO Census 2022).⁶



It is important to note here through positive action and partnership initiatives between the CSO and Pavee Point, there was a 37% increase in Traveller enumeration between Census 2006 and Census 2016.



The CSO has previously acknowledged that the involvement of Pavee Point and other local Traveller organisations led to a seamless data collection process, providing considerably more accurate statistical data, and thus resulting in a much more effective use of limited resources. This demonstrates the importance of the continued investment in positive actions based on partnership.⁷

Given this trend, we would be hopeful that the increase in census participation by Travellers will be further consolidated in Census 2023. However we are concerned that due to COVID 19 pandemic, there were significant challenges for CSO enumerators in undertaking Census 2022 in Ireland. These included illness among enumerators and fears of entering crowded accommodation, where they may have felt their health may have been more compromised. This may have particularly impacted on the enumeration of Travellers and Roma.

⁵ Outlined later in this section of our submission.

⁶ Department of Health (2022) National Traveller Health Action Plan (NTHAP). P16. <https://www.hse.ie/eng/services/publications/socialinclusion/national-traveller-health-action-plan-2022-2027.pdf>

⁷ Healy, A. (2013). Census 2011 – Working in Partnership with Irish Travellers: Ethnicity, Human Rights and Data Collection Seminar. <http://www.paveepoint.ie/wp-content/uploads/2013/11/Census-2011-Aileen-CSO.pdf>

The positive actions to maximise Traveller enumeration are summarised as follows as a resource to build upon for further positive actions for Census 2027 and are included in Section 4 of this submission.

Existing positive actions by the CSO in partnership with Pavee Point to enhance Traveller participation in censuses.

- Consultation with Pavee Point in the development of census questionnaires
- Pavee Point supporting the CSO Census Pilot Survey
- training provided by Pavee Point for census enumerator managers
- Information and knowledge share
- Traveller and Roma specific information/videos on form filling and the importance of voluntary self-identification in the national census
- dedicated website on census fieldwork
- interaction with local Traveller organisations and groups working with Roma
- National trouble-shooting and phone for both census enumerators and Traveller organisations/groups working with Roma
- Targeted supports for Roma in insecure housing situations and community engagement considering that Census 2022 was the first census to include Roma ethnicity; and
- Dissemination of census results.⁸

The under-enumeration of Travellers and Roma in censuses and the challenge for 2027

Estimations of the Roma community Ireland varies between 5,000-7,000.⁹ However, as Census 2022 was the first to specifically include Roma ethnicity, there remains no reliable demographic and socio economic data on the Roma community in Ireland. Further, the Roma community in Ireland has no visibility arising from Census 2016 and its reports.

Pavee Point has long advocated for specific inclusion of Roma in Question 11 in the national census. We welcome this inclusion by the CSO in 2022, but we are concerned that when the full results for Census 2022 are published, we will continue to see significant under-enumeration of both Roma

(and Travellers) in Ireland, for both historical and social reasons and also due to the impact of COVID 19. Additional targeted measures will be required to adequately include Travellers and Roma in Census 2027.

There are a wide range of national and international standards, legislation, census guidance and government policy that are relevant to the enhanced inclusion of Travellers and Roma in Census 2027, which are now summarised.



8 Pavee Point (2016) Towards an Ethnic Equality Question in Census 2021. <https://www.paveepoint.ie/wp-content/uploads/2015/04/Census2021Submission.pdf>

9 Pavee Point and Department of Justice and Equality (2015). Roma in Ireland. A National Needs Assessment. <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

The Public Sector Equality and Human Rights Duty

Pavee Point calls for the strengthening of and greater visibility to the equality and anti-discrimination ambitions contained in the census and in linked explanatory census information. This is consistent with Equality Legislation (2014) and in particular the Public Sector Equality and Human Rights Duty.

The Public Sector Equality and Human Rights Duty (Public sector Duty) is a statutory obligation for public bodies in Section 42 of the Irish Human Rights and Equality Commission Act 2014, Section 42(1).

The duty requires public bodies, in the performance of their functions, to have regard to the need to eliminate discrimination, promote equality and protect human rights of staff and people availing of their services. Section 42(2) requires public bodies to assess, address and report on progress in relation to equality and human rights in their strategic plan and annual reports in a manner that is accessible to the public.¹⁰

Sample of text for consideration by the CSO for Census 2027:

“ Under Irish equality legislation (2014) the CSO has a public duty to promote human rights and equality and to tackle discrimination. Your answer to this question will help give further understanding of inequalities related to social and living conditions, employment, occupation, and education of ethnic groups in Ireland. ”

UN CERD report on Ireland

Pavee Point notes the most recent concluding comments of the United Nations Committee on the Elimination of Racial Discrimination (CERD) published in 2020 which calls on the Irish government:

“ To provide statistics, disaggregated by sex, on the socioeconomic situation and representation in education, employment, health, housing, and public and political life of all minority groups, in order to provide it with an empirical basis to evaluate the equal enjoyment of rights under the Convention. ”

UNITED NATIONS (2020)¹¹

The National Action Plan Against Racism (forthcoming)

Equality data will likely be a strong focus in the forthcoming National Plan against Racism, due to be published in early 2023.¹²

10 Irish Human rights and Equality Commission website <https://www.ihrec.ie/our-work/public-sector-equality-and-human-rights-duty-faq/> Accessed December 15th 2022

11 International Convention on the Elimination of Racial Discrimination. Concluding observations. (23 January 2020) <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/018/47/PDF/G2001847.pdf?OpenElement>
Data and Analysis from Census 2021 Ethnic Group national identity and Religion. Office for National Statistics (ONS) <https://www.ons.gov.uk/methodology/classificationsandstandards/measuringequality/ethnicgroupnationalidentityandreligion>

12 Department of children, Equality, Disability, integration and Youth <https://www.gov.ie/en/consultation/017c9-towards-a-national-action-plan-against-racism-for-ireland-public-consultation-2021/>

The National Equality Data Strategy (forthcoming)

The National Equality Data Strategy is being developed by the Central Statistics Office and the Department of Children, Equality, Disability, Equality, Disability, Integration and Youth and will put in place a strategic approach to improving the collection, use and dissemination of equality data.¹³

The new EU Roma/Traveller Strategic Framework for Equality, Inclusion and Participation 2020-2030

This EU-wide strategy, supported by Ireland, advocates for the implementation of ethnic equality monitoring (EEM) inclusive of an ethnic identifier in routine administrative data sets.¹⁴ A key recommendation in EU Framework is to:

“Improve target-setting, data collection, monitoring and reporting: Working towards achievement of the EU-level headline targets and corresponding quantitative and/or qualitative national targets can trigger real progress towards Roma equality, inclusion and participation. Data should be collected regularly to feed into reporting and monitoring, improve transparency and accountability, and promote policy transfer and learning.”¹⁵

NTRIS

Ireland continues to implement the activities defined in the the National Traveller and Roma Inclusion (NTRIS) Strategy (2017-2021)¹⁶ while reviewing it and planning its successor. This is currently under development, with a commitment to taking a more outcome-focused approach, in which equality data is fundamental. The NTRIS includes commitments to improving equality data related to Travellers and Roma. Recommendations 146-149 of the NTRIS Strategy are most relevant in this context.

“Data disaggregated by ethnicity and gender should be collected across all Government Departments and statutory agencies to monitor and evaluate the impact of existing policies and strategies and to support evidence-based policy making.”¹⁷

National Traveller Health Action Plan

The National Traveller Health Action Plan published in December 2022, urges data disaggregated by ethnicity and gender should be collected across all Government Departments and statutory agencies to monitor and evaluate the impact of existing policies and strategies and to support evidence-based policy making.¹⁸

Further, the Plan highlights the need for a standardised ethnic identifier (based on the national census) to be more comprehensively rolled out to help illuminate outcomes for Travellers in our health system.

13 Department of children, Equality, Disability, integration and Youth <https://www.gov.ie/en/press-release/5a7f4-minister-ogor-man-announces-the-development-of-a-national-equality-data-strategy/>

14 The new EU Roma strategic Framework for Equality, Inclusion and Participation. European Commission (2020). https://commission.europa.eu/publications/new-eu-roma-strategic-framework-equality-inclusion-and-participation-full-package_en

15 Ibid, p7

16 NTRIS, Department of Justice.

<https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

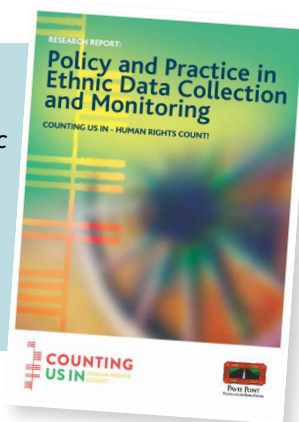
17 Ibid, p43

18 Department of Health (2022). National Traveller health Action Plan. P59.

Ethnic Equality Monitoring (EEM)

Pavee Point has previously published ‘Policy and Practice in Ethnic Data collection and Monitoring’ (2016) which is highlighted in this submission as a continuing resource to promote Traveller and Roma inclusion. This publication usefully defines Ethnic Equality Monitoring as:

“ Ethnic Equality Monitoring ..is the process used to collect, store and analyse and utilise data about the ethnic composition of a population on a regular basis, It is the systematic collection and use of data to ensure that policy makers respond appropriately to the diverse needs of a population and to establish mechanisms to promote equality and opportunity...This is vital to reduce inequalities and enhance outcomes for marginalised groups. It is also fundamental to effectively equality proof, enhance performance of services, improve delivery and to improve wider social inclusion.”¹⁹



Rationale for inclusion of the present ethnic group question in censuses in Ireland.

The introduction of a universal ethnic group question in Census 2006 was an important and positive step forward, given the rapid growth in ethnic diversity²⁰. Pavee Point would contend that the existing

framework for Q14/11 has been largely robust and stood the test of time since it was first piloted and then introduced in Census 2006 and repeated from 2011-2022. This is reflected in 97.4% response rate to Q14/11 in Census 2016.

Ethnicity is complex, but is only partially captured by the nationality, religion, language and place of birth questions. There are of course compromises that have to be made by having categories rather than providing only a self-ascription box where everyone writes in their own ethnicity - which would also make the ethnic question almost impossible to enumerate and analyse.²¹

Categories allow census administrators to arrange data according to commonalities, so that the resulting statistics can be easily reproduced and are able to be compared over time and between different sources. It should be further noted that in Census 2022 the categories in the ethnic group question were expanded by the CSO, which is to be welcomed and the question categories should continue to be periodically reviewed.

However, the CSO could do much more to explain the primary rationale for the ethnic group question. This question is best understood as an equality question. People experience discrimination and inequality in different ways.

Collecting data on ethnic group, religion and national identity can be complex because of the subjective and multifaceted nature of the concepts. Since ethnicity is a multifaceted and changing phenomenon, various possible ways of assessing ethnic groups from a statistical perspective are available and have been used over time. These include country of birth, nationality, language spoken at home, skin colour (an aspect for consideration for some and not for others), national/geographical origin and religion. What seems to be generally accepted, however, is that ethnicity includes all these aspects, and others, in combination.²² Membership to each of the concepts is something that is self-defined and subjectively meaningful to an individual.

19 Pavee Point (2016) Policy and Practice in Ethnic Data Collection and Monitoring. https://www.paveepoint.ie/wp-content/uploads/2016/04/Counting-Us-In-A4_WEB.pdf

20 We note that in 2002 a Traveller-specific question was used in the national census question was included, this, despite a significant increase in minority ethnic groups in Ireland during this time (Pavee Point, 2002).

21 The existing ethnic group question already provides for a self-ascription option.

22 Office for National Statistics (2023). Website. Ethnic group, national identity and religion. <https://www.ons.gov.uk/methodology/classificationsandstandards/measuringequality/ethnicgroupnationalidentityandreligion>

For Census purposes, these concepts they tend to evolve in the context of social and political attitudes or developments. For example, up until the 1970s (and beyond,) Irish Travellers were routinely referred to by government agencies as ‘Itinerants’.²³ A term that is pejorative and denies self ascription and Traveller ethnicity. It was only through advocacy by Travellers and Traveller organisations over many years that this term has by and large been consigned to history.

From a sociological perspective the ideal might be for those filling in the census to totally self-ascribe and to have no categories. However from an equality and census efficacy perspective, there needs to be the opportunity for self-ascription along with categories for practical and equality purposes.

This is particularly the case for marginalised groups that routinely experience inequality on the basis of ethnicity and/or skin colour and/or national origin. The ethnic group question in UK census is similar to Ireland. In the rationale for questions of identity the UK’s Office for National Statistics (ONS) makes reference to the Equality legislation(s) in the UK and the ‘Public Sector Equality Duty’²⁴. The CSO should consider a similar approach in Ireland as this would help explain both the rationale and the question format.

More effective use of the ethnic group data in reports in Ireland

There is a potential better use of the ethnicity question to inform public services in Ireland from a human resource perspective is demonstrated by a Research Briefing recently published in the UK Parliament (September 2022).

The research question was ‘In 2021/22. 13% of the UK population aged 16 and over was from a minority ethnic background. How is this reflected in politics and public life’. One conclusion from this briefing paper, relevant for the diversity of those employed in health services in Ireland and future planning, was as follows:

“ In NHS England, 25.2% of staff reported as being from an minority ethnic background in 2022, compared with 15.7% of the economically active population. 49.5% of doctors and 41.9% of hospital consultants in NHS England were from minority ethnic backgrounds. Representation of Asian staff was particularly high, at 34.5% of doctors and 32.2% of consultants. ”²⁵

International guidance on censuses

Countries worldwide use a variety of methods and data sources to collect their census data. Each country has considerable autonomy on their approach to censuses, including countries within the European Union.

To date in Ireland has adopted a ‘traditional’ or field’ approach to census enumeration. This involves teams of enumerators calling to each household in the country to deliver and collect census forms.

The 2021 Census in England, Wales and Northern Ireland was the first occasion when each parts of the UK carried out primarily online methodology to census collection. Thus, analysis of the UK experience of online enumeration and the experience of minority ethnic groups participation or otherwise, remains limited and too recent.

23 For example: Government of Ireland, Report on the Commission on Itinerancy, 1963. <https://opac.oireachtas.ie/AWDData/Library3/Library2/DL013441.pdf>

24 Office for National Statistics (2023). Website. Ethnic group, national identity and religion. <https://www.ons.gov.uk/methodology/classificationsandstandards/measuringequality/ethnicgroupnationalidentityandreligion>

25 House of Commons Library. Research Briefing. (30 September 2022) <https://commonslibrary.parliament.uk/research-briefings/sn01156/>

On the other-hand, Australia has undertaken a primarily online approach to Census enumeration since 2016, with 79% preferring this method in the 2021 Census of Australia (see Section 3 of this submission).

According to the CSO website, the Central Statistics Office is working towards an online option for Ireland's next census in 2027.

In addition to the traditional/field census approach, options presently being considered or adopted by other countries worldwide include using population registers, a combination of a traditional census and sample surveys, or a combination of a register-based census and sample surveys. Such approaches are not considered for Ireland at present and would in any case would be likely unacceptable under GDPR and public opinion in Ireland, but also they would likely be rejected from a human rights and efficiency perspective.

The United Nations' World Population and Housing Census Programme includes principles and recommendations to guide and assist countries in carrying out their regular censuses. This practice and guidance is relevant to the development of an online approach to Census enumeration in Ireland in 2027 and is considered in the next section of this submission.

Key considerations/standards for an online approach to census enumeration

The following part of this submission are a range of overall observations on standards/guidance for Censuses, drawn from the literature review for this submission:

- The UN consistently advocate that a periodic census is essential in informing public services and public planning in individual countries and should not be undermined
- Acknowledgement is given that there is significant diversity in the approaches adopted by individual countries in census design and methodology for collection of data
- All censuses require adequate resourcing; confidentiality; transparency; trust in the office managing the census and requires 'the full awareness and agreement of the public to participate in it'²⁶
- The UN consistently highlights the inclusion of minority and 'hard to reach' communities in censuses and related surveys.

Online enumeration and traditional/field enumeration discussion

- Most countries worldwide continue to use the traditional/field approach for censuses undertaken in the early 2020's. However many are presently considering alternative approaches²⁷. The UK and Australia are among the first countries that have adopted an online approach to census enumeration (Australia in 2016 and 2021 and UK in 2021)
- Some countries are considering or have adopted very radical approaches to census enumeration, including establishing online registers or a combination of registers and traditional field enumeration. Other countries are considering taking data from other national surveys to compile the census surveys. Such radical approaches are not presently considered in Ireland we understand and they would certainly raise GDPR and human rights concerns if they were considered at a future date.

²⁶ United Nations (2017) Population and Housing Censuses. https://unstats.un.org/unsd/publication/seriesM/Series_M67Rev3en.pdf

²⁷ Ibid

- There is a recognition of the pros and cons of traditional field enumeration in census enumeration, that are summarised below:

Advantages and disadvantages of traditional field enumeration for census collection

Advantages	Disadvantages
Comprehensiveness of coverage	Cost
Flexibility in the design of Questionnaire	Administrative complexity
Field work undertaken in relatively short and defined time	Conducted only every 5 or 10 years so information can become outdated
Data is 'raw' and requires little adjustment	Difficulty in enumerating those with multiple residences

UN identified pre-requirements to inform an adoption of an online/part online enumeration methodology

The United Nations has identified the following pre-requirements for an online/part online approach to census enumeration:

- High literacy rate
- High rate of access to computers and computer literacy
- High rate of access to Internet (including adequacy of broadband)
- Public trust and acceptance of the Internet for official business
- Making reasonable assumptions about take-up rates
- Availability and quality of address/building/dwelling register or list
- Legal authority, especially in case of moving from traditional field enumeration to online data collection.

The UN further points to practical (soft) issues such as:

- How households are invited to respond by Internet
- How many times they are contacted
- Whether the option of self-responding by completing a paper questionnaire is offered at initial stage.

Offering the paper questionnaire for self-enumeration can be grouped into three categories:

1. Paper questionnaire provided at initial contact, where an Internet option is offered including a unique Internet access code
2. Paper questionnaires available on request-to maximize the overall response rate
3. Paper questionnaire sent during the reminder phase-sending only invitation letter providing Internet access code initially and then providing a paper questionnaire with a reminder

This UN notes the need for 'unique identifiers' to access the online questionnaire is necessary for data confidentiality and identification.

Potential impact in Ireland

It is clear Ireland already appears to meet most of the pre-requisites for online census enumeration. However, this could be at the price of reduced comprehensiveness of coverage and could undermine the progress made on Traveller and Roma inclusion in Census 2027 outlined in this submission. Literacy and by extension computer literacy levels remain poor in the Traveller and Roma communities in Ireland. Language barriers also remains an issue for the Roma community. Existing research shows that there is a wide diversity of languages spoken among Roma in Ireland. 61% of Roma reported usually speaking Romani at home.²⁸

Literacy levels in Ireland

According to the National Adult Literacy Association (NALA) in Ireland, 520,000 adults (one in six or 18%) find reading and understanding everyday texts difficult. This means over half million adults have difficulty reading and understanding a leaflet, bus timetable or medicine instructions. Similarly, 1 in 4 (25%) scored at the lowest level of numeracy. For the Traveller Community the literacy issue is even more stark with an estimated half of Travellers having poor functional literacy skills.²⁹

Governments may also be attracted by the potential cost savings as well as potential reduced administrative complexity in moving away from the traditional/field enumeration system.

However, changes in Census collection methodology could result in a major decline in comprehensiveness of coverage and linked trust that could in turn lead to significant under-enumeration, including in particular for disadvantaged groups such as Travellers and Roma. The advances made by the CSO working in partnership with Pavee Point may also be unintentionally undermined, including undermining the cost savings to the CSO.

Historical factors for under-enumeration of Traveller and Roma Communities

Ireland was not occupied by the Nazis in World War II. If it was invaded and occupied, Irish Travellers would have likely suffered the same fate as the Roma communities in occupied Europe.

The Council of Europe is one of many international bodies that continues to highlight the legacy of the impact of the Holocaust/genocide of Roma communities during the period 1939-1945. The Council of Europe notes:

²⁸ Pavee Point and Department of Justice and Equality, Roma in Ireland. A National Needs Assessment. <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

²⁹ Data drawn from NALA from the All Ireland Traveller Health Study (2010)

“Roma’s persecution, which had lasted for centuries, culminated in genocide under the Nazi regime. Defined as a “problem”, “asocials”, and “racially inferior”, the Roma were arrested and murdered in the German Reich and the German-occupied territories... Some 500,000 Roma and Travellers were murdered in extermination camps.”³⁰

Censuses in occupied territories were routinely used by the Nazis to target those considered as racially inferior for extermination. For example, the Nazi German government conducted a census on 17 May 1939 in which a special ‘supplementary card’ was included, where every person had to list if each of their four grandparents was Jewish or not.

Misuse of census data was not confined to occupied Europe. In the United States the US Census of 1940 was secretly used to send Japanese Americans to internment camps.³¹ In 1988 President Reagan provided the first formal apology for this incarceration and offered reparations of \$20,000 to surviving families.³²

Aborigine and Torres Strait Islanders were excluded from successive censuses in Australia for 70 years. From 1901 to 1971 these First Nation peoples were excluded from being counted as part of the national population by a clause in the Constitution of Australia.³³

In Australia a referendum in 1967 decided that First Nation peoples should be included in Census 1971.

In short, historically censuses have not only helped plan for better services and planning but on occasion they have been abused to support genocide and oppression, including of the Roma community. Censuses have also on occasion been used to promote exclusion, sometimes enshrined in legislation and sometimes for decades. While the worst excesses took place in Nazi-occupied Europe, abuse of census data or exclusion has clearly not been confined to totalitarian regimes or to national emergencies such as periods of conflicts.

The contemporary potential of the abuse of census returns for criminal purposes is also a factor that should underpin security concerns if an online system of census enumeration is introduced into Ireland. It is likely that online enumeration will be contracted out to a private company for Census 2027. A temptation for commercial companies can be to take shortcuts on security to reduce price or to meet a tight deadline. The lessons from Australia in 2016 are very relevant to this point (see Section 3 of this submission).

For those communities such as many Roma in Ireland whose grandparents may have experienced the Holocaust, there will be a legacy of suspicion in completing census returns that will require significant further building of trust and positive actions to begin to overcome the legacy of this tragedy. Traveller and Roma groups are well positioned to provide the expertise to help build further trust for Census 2027. However this could be undermined if census data is hacked and used for ransomware attacks.

30 Council of Europe Website. Roma and Travellers. Roma History and Holocaust. <https://www.coe.int/en/web/roma-and-travellers/roma-history/-/holocaust>

31 Washington Post (2018). <https://www.washingtonpost.com/news/retropolis/wp/2018/04/03/secret-use-of-census-info-helped-send-japanese-americans-to-internment-camps-in-wwii/>

32 The National WWII Museum (2021) <https://www.nationalww2museum.org/war/articles/redress-and-reparations-japanese-american-incarceration>

33 National Museum of Australia Website (2023) <https://www.nma.gov.au/defining-moments/resources/first-nations-peoples-census>

Section 2:

The inclusion of Travellers and Roma in non-census CSO reports/surveys

The CSO is not only actively involved in the administration and analysis of the census but it also administers/contributes to other major equality related reports in Ireland. The potential of enhancing Traveller and Roma inclusion in such initiatives/reports is discussed in this section of our submission, with proposals included.

National equality data audit

In 2020 a National Equality Data Audit of the Irish Public Service was commenced:

The Equality Data Audit is a new initiative to bring awareness of the available data related to equality and also highlight gaps in the data'.³⁴... 'Some analysis was then completed, highlighting areas where there is a lack of data collected, such as Race and Sexual Orientation, and also areas where there is a large variety of data sets available, such as Age. The full results can be found in the coming chapters'.

There is a need to consult with key stakeholders on the further analysis from this Audit. The outmoded use of the term 'race' is worrying and contradicts the adoption of ethnic group framework that has characterised the Census in Ireland since 2006. There is (rightly) no mention of 'race'. While 'race' is given credence as a concept in the United States for historical reasons, it has been heavily critiqued is no longer an accepted term in Ireland and Europe.

Proposal: The status of the National Equality Data Audit needs to be clarified. Further, its conceptual basis needs to be reviewed if the audit is proceeding. The inclusion of Travellers and Roma in future chapters also needs to be clarified.

CSO household surveys

The CSO publishes a range of non-census surveys including for example:

- The Labour Force Survey
- Survey on Income and Living Conditions
- CSO PULSE Surveys (a recent CSO initiative involving rapid and thematic surveys related to current events).

³⁴ <https://www.cso.ie/en/methods/methodologicalresearch/rp-eda/equalitydataaudit2020/> (2020-present)

Proposal: The above surveys are relevant to key subjects such as poverty; health; employment and they should be reviewed for their greater inclusion of Travellers and Roma in Ireland.

Proposal: The forthcoming publication of the thematic report by the CSO on ‘Gender, Women and Men in Ireland’ should also be reviewed to ensure its inclusion of Travellers and Roma. Key stakeholders such as Pavee Point should be involved in such a review.

Proposal: The forthcoming CSO National Survey on Sexual Violence needs to be inclusive of the Traveller and Roma community, again with input from groups such as Pavee Point.

Proposal: The CSO Analysis of Weekly and Annual Earnings is presently by sex, religion, age and nationality but not ethnic group. This omission needs to be redressed.

The CSO equality and discrimination survey

Undertaken every 5 years, the CSO Equality and Discrimination Survey covers the previous 2 years before publication. It covers the workplace and access to services on ten grounds. Travellers and Roma were not included in the 2019 survey and subsequent statistical report.³⁵

Proposal: Consideration should be given by the CSO for Travellers and Roma to be the main focus of the next Equality and Discrimination Survey.

³⁵ CSO equality and Discrimination Quarter 1 2019.
<https://www.cso.ie/en/releasesandpublications/er/ed/equalityanddiscrimination2019/>

Section Three:

Case study of Australia, with a particular focus on online and under-enumeration

Australia has been chosen as the case study for this submission because:

- It has a longer experience of online census enumeration than for example the UK. Australia pioneered their online approach to data collection in 2016 and 2021. By contrast, the UK introduced online enumeration in 2021
- There are significant ‘First Nation’ peoples in Australia (Aboriginal and Torres Strait Islanders). Some of the challenges of including First Nation peoples have relevance to Ireland. Others will be Australia specific such as huge travel distances involved in traditional/field enumeration
- Their approach to Census administration in Australia is not dissimilar to Ireland. The equivalent of the CSO in Ireland is the Australian Bureau of Statistics (ABS).

Online enumeration in Australia

Since 2016, Australia has had a hybrid approach to census enumeration. In short the methodology for census collection is primarily online but a traditional paper/field approach to the completion of census form completion and return remains a feature of Census 2021 and beyond.

Following Census 2021, the Australian Bureau of Statistics (ABS) confirmed to the media that 79% of all census forms enumerated for the 2021 census were completed online through the ABS ‘Census Digital Service’.³⁶ Further the ABS confirmed that overall Census participation had slightly increased from 95.1% of households in 2016 to 96.1% in 2021.³⁷ This cost the Australian government and subsequently IBM Aus\$30million to resolve this issue. The Premier of Australia Malcolm Turnbull was reported by the Guardian Newspaper in the wake of Census 2016.

“Malcolm Turnbull says taxpayers have been fully compensated for the multimillion dollar cost of the bungled 2016 census.

He said IBM had paid a “very substantial” but confidential settlement which “absolutely” covered the cost of the census debacle.

Last month, the head of the Australian Bureau of Statistics, David Kalisch, said the failure of the census website would cost taxpayers about \$30m.”³⁸

The near disaster of online enumeration in 2016

When online census enumeration was first introduced in the Census of Australia in 2016, it was almost a disaster. Major emergency remedial action was needed to rescue Census 2016 because of data hacks. Reforms were subsequently introduced to ensure the mistakes that took place in 2016 were not replicated in Census 2021.

36 Media Report. June 30th 2022 <https://ia.acs.org.au/article/2022/online-census-2021-clicked-with-australians.html>

37 Australia Bureau of Statistics. Participation in the 2021 Census. <https://www.abs.gov.au/census/about-census/2021-census-overview/participation-2021-census>

38 Guardian Newspaper. (25 November 2016). <https://www.theguardian.com/australia-news/2016/nov/25/ibm-has-paid-many-millions-for-census-debacle-says-turnbull>

In the Census 2016 the ABS was subjected to 4 online ‘denial of service attacks’. This resulted in the online Census being taken offline at the commencement of the Census collection period. This not only delayed the 2016 Census in Australia, but led to much high level political and public criticism of the ABS and the commercial IT company that managed the system on behalf of ABS.³⁹

As a result of this near-disaster the ABS implemented the following measures ahead of Census 2021 to avoid a repeat of 2016.

“ The ABS implemented state of the art cyber-security protections informed by the Australian Cyber Security Centre and other experts. All information collected in the Census was securely hosted in Australia and encrypted end-to-end. Ahead of the 2021 Census, the Digital Transformation Agency confirmed the Census Digital Service was compliant with the Digital Service Standards for Australian Government services’.”⁴⁰

In the run up to Census 2021, ABS also commissioned significant advertising focused on the stories of how Census data is used to advantage by local communities and organisations.

The 2021 Census form allowed the ABS to collect data on long-term health conditions, such as heart disease, arthritis and diabetes, to inform health policy and planning for community services.

Some changes were also made to existing questions to ensure continued relevance of the Census and improvement of the quality of the data. These included enhancing response options for the language and ancestry questions for Aboriginal and Torres Strait Islander people.

As a result of these measures, the administration of Census 2021 appears to have been largely successful and has not attracted major adverse comment, Efforts to include First Nation Communities in Census 2021 are considered in the next section of this submission.

The inclusion of first nation peoples in Census 2021

Despite the largely Online enumeration in Census 2021, the Australian Bureau of Statistics employed 32,000 field staff to assist with the traditional/paper filling and collection of Census forms for Census 2021 that was preferred by 21% of the population.

“ We recruited Census staff in cities, towns and regional areas across all states and territories to help deliver the 2021 Census.”

Census staff were identified as a crucial workforce that helped people throughout Australia to participate by:

- delivering Census instructions and forms and visiting households that had not responded
- promoting Census participation and answering peoples’ questions
- helping members of the public who needed special support to complete the Census.

39 Media Report. August 2016. <https://ia.acs.org.au/article/2016/census-website-taken-down---abs-blames-attackers.html>

40 ABS website, ibid <https://www.abs.gov.au/census/about-census/2021-census-overview/participation-2021-census>

In short, though online was the preferred option for most Australians in 2021, ABS used a range of targeted measures to generally maximise participation through continuing traditional field enumeration, including:

- Sending out forms out earlier than planned
- Setting up travel teams
- Setting up community pop-up hubs.

According the Australian Bureau of Statistics (ABS):

“In urban and regional areas, pop-up hubs, information sessions and fill-in-the-form sessions were run to provide face-to-face support. These were places where people could get a paper form, pop in to chat about the Census, and get information and support. In remote areas, the Census is conducted over an extended period. This is so remote teams can cover vast areas and visit multiple communities.

For people living in remote communities, Census staff helped people to complete the Census through face-to-face interviews or over the phone in some areas.

National radio advertising for the Census was translated into 19 Indigenous languages to support awareness in Aboriginal and Torres Strait Islander communities.”⁴¹

The approach in Australia to address under enumeration in the Census

As with Travellers and Roma in Ireland, under-enumeration of first Nations people is a major challenge in Australia.

According to one media report, the discomfort of First Nation Peoples in participation in the Census in Australia:

“Is grounded in history: Australia’s past is replete with government misusing data on First Nations people.”⁴²

There are other barriers that inhibit a full participation rate in Australia.

“The literacy and numeracy, sometimes our mob feel that they can’t fill in that form. So we’ve got in remote communities, we’ve got officers out there, helping them fill in the census.”⁴³

The number of First Nation people enumerated in Census 2021 in Australia rose by 23.2% since 2016- with early indications that the increase is in large part due to previous under-enumeration.

Adjustment in the census of Australia for under-counting

Interestingly, the preliminary 2021 Census counts of First Nation Aboriginal and Torres Strait Islander people are adjusted for net undercount as measured by a Post Enumeration Survey.⁴⁴ (See the methodology of the ABS in Annex One of this submission).⁴⁵

41 ABS website (2023) <https://www.abs.gov.au/census/about-census/2021-census-overview/participation-2021-census>

42 <https://www.sbs.com.au/nitv/article/we-count-50-years-after-the-first-census-to-include-first-nations-people/ayl9ovgho>

43 <https://www.sbs.com.au/nitv/article/we-count-50-years-after-the-first-census-to-include-first-nations-people/ayl9ovgho>

44 Australian Bureau of Statistics, (June 2021) <https://www.abs.gov.au/statistics/people/aboriginal-and-torres-strait-islander-peoples/estimates-aboriginal-and-torres-strait-islander-australians/latest-release>

45 Australian Board of Statistics <https://www.abs.gov.au/methodologies/estimates-aboriginal-and-torres-strait-islander-australians-methodology/jun-2021>

Section 4:

High level recommendations: Towards an equality/hybrid strategy to Census 2027

The following is a summary of the key recommendations arising from this report. There are further proposals for non-census CSO reports in Section 2 of this submission:

High level recommendations for Census 2027

01	A framework of positive action measures and linked resources are needed to optimise the enumeration of Travellers and Roma in Census 2027 in Ireland. These should build on previous CSO/Pavee Point positive actions (see section 1)
02	The Public Sector Equality and Human Rights Duty (2014) must clearly underpin all aspects of Census 2027 including its rationale and Profile 8
03	The ethnic group question should be retained for 2027 and evolved if necessary for future censuses based on contemporary analysis
04	Profile 8 structure and content needs a significant review for 2027. It should be renamed 'Travellers and Roma' and information on religion and other ethnic groups should be moved to a new Profile(s). There should be greater disaggregation of data based on gender
05	Other Profiles, including the Profile on Health for the general population arising out of new questions to Census 2022 should include a focus on Traveller and Roma Health. This applies to other relevant profiles such as Profile 1: Housing
06	An Equality and Hybrid model to all online enumeration in census 2027 needs to be adopted. This means that a significant minority in Ireland (Travellers and non-Travellers will continue to prefer/ need a traditional/fieldwork approach to census enumeration (using enumerators. Further targeted positive actions are needed for Traveller and Roma communities on Ireland should be agreed by the Census Advisory Group
07	Adequate planning and security for online enumeration is essential. The near disaster of online Census enumeration evident in Australia in 2016 should be avoided at all costs
08	A post-census adjustment system for the under enumeration of Travellers and Roma based on the approach in Australia should be introduced
09	Non-census CSO equality related reports should be move inclusion of Travellers and Roma (see detailed proposals in Section 2 of this submission)
10	The Australian Bureau of Statistics. (ABS) publishes preliminary data including on First Nation peoples shortly after the Census, Such an approach should be considered in Ireland
11	Consideration should be given to the participation of Pavee Point on the proposed CSO Census Advisory Group
12	Commitment by the CSO to publish a Post-Census Report, including a focus on all aspects of the Census, including online and field enumeration and under-enumeration of Travellers and Roma.
13	Continue to build on positive partnership working with Pavee Point including development and dissemination of targeted communication materials for Travellers and Roma and training for Census enumerators. Additional resources for this should be sought by the CSO for this purpose.

Towards an equality and hybrid census approach to Census 2027 in Ireland

The following constructive proposals are presented for consideration by the CSO for Census 2027, building on previous strategies and partnership with Pavee Point for the inclusion of Travellers and Roma.

High level recommendations for Census 2027

Strategic Objective	Proposed Actions
CSO Developing and publishing an Equality/Hybrid Approach to Census 2027 enumeration for further consultation	<p>CSO to develop and publish a draft strategy for an Equality/Hybrid approach to census enumeration in 2023 for consultation. Key sections in this strategy to include:</p> <p>Rationale for adopting an Equality/Hybrid online and traditional/field approach to enumeration in Census 2027 with recognition that most will want an online approach but others will want/need traditional/field enumeration.</p> <p>Principles underpinning this strategy</p> <ul style="list-style-type: none"> • Informed Choice • Security of online and paper enumerated data • Information and public awareness • Information and public awareness (targeted and mainstream awareness measures) • Transparency and trust building • Targeted support to communities who will likely want/need a traditional/field approach and resource assessment • Public Sector Duty on Human rights and Equality <p>Groups likely needing support including access to traditional/field enumeration:</p> <ul style="list-style-type: none"> • Travellers and Roma (though some will opt for online enumeration) • Those with poor digital skills • Those with poor literacy • Those with poor English language skills • Those with poor access to broadband <p>Review of Profile 8 for census 2027</p> <p>Commitment to publish a Post-Census Report, including a focus on online and field enumeration and under-enumeration (see Australia case study)</p>
Implementation of strategy	<p>Significant public awareness strategy in the lead up to Census 2027 to explain the Equality/hybrid approach</p> <p>Partnership with expert groups in the voluntary sector on positive actions (see section 1 of this submission for example)</p>
Review of Strategy	<p>Publish a Post Census Report, including a focus on under-enumeration and other continuing challenges</p>

Annex one

Adjusting for under enumeration in Australia. Methodology used in Aboriginal and Torres Strait Islander population estimates in post 2021 Census period.

Introduction

The preliminary estimate of the Aboriginal and Torres Strait Islander population at 30 June 2021 was 984,000 people. This estimate comprises 812,500 people counted on Census night, plus the 170,800 people measured as net undercount and the inclusion of an additional adjustment of 500 people. This technical note outlines the method used to compile the preliminary 2021 rebased estimate of the Aboriginal and Torres Strait Islander population.

Method of estimation

The preliminary Aboriginal and Torres Strait Islander population estimate is based on the 2021 Census of Population and Housing and is calculated using a similar process to that used for the total Australian population.

We calculate the preliminary rebased Australian population estimate at 30 June in a Census year by:

1. Adjusting Census counts of Australian usual residents to account for people missed, counted more than once, or counted in error in the Census (based on PES results)
2. Demographically adjusting Census counts or net undercount estimates based on coherence with other data sources and to remove implausible demographic features
3. Adding usual residents temporarily overseas on Census night
4. Adjusting for births, deaths and migration from 30 June to Census night.

Annex two: Select bibliography

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PAVEE POINT
TRAVELLER AND ROMA CENTRE

Pavee Point Traveller and Roma Centre
46 Charles Street Great, Dublin 1, Ireland
Telephone: (+353) 1 878 0255 *Email:* lynsey.kavanagh@pavee.ie

www.paveepoint.ie

