



INTERNATIONAL COVENANT ON ECONOMIC, SOCIAL and CULTURAL RIGHTS IRELAND

Joint Alternative Report by a Coalition of Traveller and Roma Organisations January 2024

1 INTRODUCTION

Irish Travellers and Roma in Ireland

There are over 36,000 Irish Travellers in Ireland, representing less than 1% of the nation's population and an estimated 16,049 Roma,¹ many of whom live in poverty due to lack of access to work and restrictive social welfare measures.² As minority ethnic groups, Travellers and Roma experience persistent racism and discrimination on the basis of ethnicity, gender and other grounds. As a result, Travellers and Roma are among the most marginalised and excluded individuals and groups in Ireland.

Our Coalition

This report is submitted as a coalition of eight organisations which work towards achieving Traveller and Roma rights in Ireland. **Pavee Point Traveller and Roma Centre ('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.

¹According to Census, 2022 there are approximately 32,949 Travellers in Ireland, however this is considered an undercount as the All Ireland Traveller Health Study (AITHS) established the Traveller population at 36,224 in the Republic of Ireland (Kelleher et al., 2010). Census 2022, reported an estimated 16,049 Roma, with this was the first time Roma ethnicity was included in the Census form. <https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>

² This estimate is based on the findings of Ireland's first National Roma Needs Assessment. Pavee Point Traveller and Roma Centre and Department of Justice and Equality (eds), *Roma in Ireland - a National Needs Assessment*, Department of Justice and Equality and Pavee Point Traveller and Roma Centre, 2018.

Our Report

This report is approximately structured to follow the same form as the report submitted by the Irish State, with consideration also of the Committee on Economic, Social and Cultural Rights list of Issues in relation to the fourth periodic report of Ireland.³ We outline priority issues for Travellers and Roma – both persistent and new developments – to provide an up-to-date account of the human rights situation of Travellers and Roma. We refer to the extent to which Ireland has implemented the recommendations from the previous cycle and those made by other UN treaty monitoring bodies.

Since the last examination of the State Party, a significant milestone has been met; the Irish State officially acknowledged Traveller ethnicity in 2017. However, much remains to be achieved for Travellers and Roma in concrete terms. Traveller and Roma fare poorly under many articles in the Covenant on Economic, Social and Cultural rights, in relation to the general population.

The All Ireland Traveller Health Study (AITHS) 2010, reports high levels of health inequalities for Travellers, including stark findings in relation to mortality rates and life expectancy. For example, Traveller babies are three times more likely to die in their first year than infants in the general population. The AITHS also found that the suicide rate for Traveller men is 6.6 times higher and accounts for over 1 in 10 Traveller deaths. While the findings of the AITHS were published in 2010, the veracity of its findings has been endorsed by a number of subsequent State surveys and research reports. This includes recently published data from the national census in 2022 which reported that the average age of Travellers was 27 years compared with 39 years for the total population, with Traveller children under the age of 15 now making up 36% of the population, compared with 20% of the general population⁴.

In 2017, the Economic and Social Research Institute (ESRI) found that Travellers are almost 10 times more likely than non-Travellers to experience discrimination in seeking work. It also found that Travellers are 22 times more likely to experience discrimination in accessing private services such as restaurants and banks. According to the EU Fundamental Rights Agency (FRA) (2019), 65% of Travellers reported experiencing discrimination; one of the highest reported rates within the six European countries it surveyed. This is also reflected in the general respondents surveyed with 46% stating they would feel “uncomfortable with Roma and Travellers as neighbours.”

We are calling on the State’s obligations to ensure non-discrimination and the protection of minority and marginalised groups. Measures to progress the rights of Travellers and Roma remain urgent. While the State has committed to developing some important strategies, e.g. in relation to the right to work, in other areas such as education, there is a need for new and targeted plans. Where strategies are in place, implementation is often an issue. The National Traveller and Roma Inclusion Strategy (NTRIS) fell short in this regard. The new Strategy being developed is now long overdue. Throughout this report, recommendations highlight the need for the effective monitoring of plans, including the identification of indicators, collection of data and penalties for lack of implementation. The relative inertia and the lack of implementation in critical policy areas, including accommodation, continues to have a detrimental impact on health and means Travellers and Roma remain among the most marginalised groups in society.

For further information and to contact our Coalition:

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³ Adopted by the pre-sessional working group at its seventieth session (7-10 2022).

⁴ Central Statistics Office (2022) [Census 2022 Profile 5 - Diversity, Migration, Ethnicity, Irish Travellers & Religion](#)

2 SUMMARY OF RECOMMENDATIONS

ICESCR Article No.	SUMMARY RECOMMENDATIONS We recommend the State to:
2	<ul style="list-style-type: none"> • Conclude and publish the now overdue NTRIS, ensuring an outcome focused approach with a robust monitoring and implementation plan. • Ensure the involvement of Traveller and Roma organisations in the National Action Plan Against Racism (NAPAR) monitoring and implementation structures. • Ensure accountable implementation of Action 3 of the NAPAR which provides for “taking steps to ensure that measures to eliminate the dissemination of hate speech online are effective and have regard to the local context in Ireland.” • Ensure that the full and effective development and implementation of ethnic equality monitoring (in line with human rights standards) across all relevant State departments and public bodies, as part of the forthcoming National Equality Data Strategy.
3	<ul style="list-style-type: none"> • Ensure robust implementation plans with clear targets and resources to advance the rights of Traveller and Roma women and girls in the next iteration of a National Strategy for Women and Girls. • Provide detail of the commitment and approach to prioritising the human rights of Traveller and Roma women in both targeted and mainstream policy measures, in the next National Strategy for Women and Girls. • Special measures to address the intersectional racism and discrimination experienced by Traveller and Roma women, including regarding gender, domestic and sexual-based violence, and ensure such measures have clearly defined resources, timeframes, targets, indicators and outcomes. • Ensure the Third National Strategy on Domestic, Sexual and Gender-based Violence (DSGBV) includes additional and specific support measures in relation to DSGBV targeted for Traveller and Roma women and ensure they are included in the mainstream measures of the plan. Ensure it has a robust implementation plan, including clear targets, indicators, outcomes, timeframes, accountability and resources relevant to Traveller and Roma women. • Recruit members of minority ethnic groups to work in the newly established DSGBV agency, Cuan - operational from 1 January 2024. • Agencies and service providers working to tackle DSGBV (an Garda Síochána, TUSLA, women’s refuge) to introduce an ethnic identifier and ethnic equality monitoring across all relevant data sets. • Ensure Traveller and Roma organisations are actively included and consulted in the work of Cuan, the new Domestic, Sexual and Gender-based Violence Agency operational 1 January 2024.
6, 7	<ul style="list-style-type: none"> • Urgently ensure implementation of the State commitments from the “Programme for Government: Our Shared Future 2020-2025 including to deliver and support a range of assistive and targeted measures to increase employment, training and apprenticeship opportunities for Travellers and Roma, in order to address the significant levels of discrimination in employment faced by Travellers and Roma. • Develop a comprehensive Traveller and Roma Training, Employment and Enterprise Strategy. • Develop a gender proofed National Traveller Employment and Enterprise Strategy as part of the new Pathways to Work strategy.

9	<ul style="list-style-type: none"> • Ensure that all children residing in the State, including Roma children, can access Child Benefit payments regardless of the legal or administrative status of their parents. • Adopt and implement measures to regularise the status of EU citizens living in the State for a number of years but unable to satisfy all the conditions of the Habitual Residence Condition (HRC).
10	<ul style="list-style-type: none"> • Set clear and time bound targets specific to poverty reduction among Traveller and Roma children in both targeted policy measures (National Traveller and Roma Inclusion Strategy) and mainstream policy measures. • Set targets and measures for preventative measures to address the over-representation of Traveller and Roma children in Oberstown Children Detention Campus, in the State's child protection and welfare register, and to address accommodation and health inequalities faced by Traveller and Roma children.
11	<ul style="list-style-type: none"> • Implement all recommendations issued by the independent Expert Group on Traveller Accommodation with a time lined implementation plan, tangible targets, corresponding accountability measures and budget. • Address the homelessness and housing crisis among Roma by introducing clear actions and an associated implementation plan and resources. • Include Traveller and Roma specific targets in wider Government policy responding to homelessness.
12	<ul style="list-style-type: none"> • Fully implement and resource the National Traveller Health Action Plan (NTHAP) and include ethnic data; and develop health indicators to monitor Traveller and Roma access, participation and outcomes in health. • Continue supporting and further developing both mainstream and special measures to address Roma health inequalities. • In line with the State's 'Programme for Government: Our Shared Future 2020-2025', we continue to call for the development of a Traveller Mental Health Strategy.
13	<ul style="list-style-type: none"> • Urgently complete development of the National Traveller and Roma Education Strategy and ensure the Strategy has robust implementation and monitoring framework, with associated dedicated targets, indicators, and resources to address the educational disadvantage of Travellers and Roma at all educational levels. • Include those most at the margins in digital literacy and digitalisation process in service provision, work in partnership with Travellers and Roma in the digitalisation process, and continue to invest in non-digital service provision.
15	<ul style="list-style-type: none"> • Open a new dialogue as to how the State interacts with Travellers and Roma into the future. • Develop and implement an awareness raising campaign with the general population about anti-Traveller and anti-Roma racism and provide support towards the celebration of Traveller and Roma cultures on a permanent and ongoing basis. • Ensure that the inclusion of Traveller culture and history in school curriculum takes place in active consultation with Traveller organisations and acts as a precedent for further inclusion of all the cultures which are part of the diversity in Irish society. • Implement the findings and recommendations of the Irish Human Rights and Equality Commission (IHREC) equality reviews of Traveller accommodation including regarding the provision of Traveller specific and culturally appropriate accommodation for Traveller families.

Table 1: Summary recommendations

3 RECOMMENDATIONS

Non-discrimination - Article 2 (2)

Traveller and Roma are among the groups experiencing the highest levels of discrimination in Ireland. In relation to non-discrimination, key measures include the National Traveller and Roma Inclusion Strategy (NTRIS), National Action Plan Against Racism and the Public Sector Equality and Human Rights Duty, all of which require disaggregated ethnic equality data to be effective. In this regard, the announcement of a National Equality Data Strategy is welcome.

Discrimination against Travellers	Discrimination against Roma
<ul style="list-style-type: none"> • Travellers are over 22 times more likely than White Irish to report discrimination in shops, pubs and restaurants • Travellers are 10 times more likely than White Irish to experience discrimination in seeking work • 40% of Travellers experience discrimination in accessing health services 	<ul style="list-style-type: none"> • The implementation of EU Directive 2004/38 and state policy (Habitual Residence Condition) leaves many Roma outside of the social protection system and, thus, vulnerable to poverty and social exclusion • 78.9% of Roma feel discriminated in getting a job • 93.3% of Roma feel discriminated in getting accommodation • 84.4% of Roma feel discriminated in getting social welfare • 81.1% of Roma feel discriminated in a public setting.

Table 2: *Discrimination of Travellers and Roma at a glance*

National Traveller and Roma Inclusion Strategy (NTRIS) – The next iteration of the NTRIS is overdue and we call on the State to promptly conclude the process. ensuring it has an outcome focused approach, a robust implementation and monitoring plan with clear targets, indicators, timeframes and budget lines with actions being resourced and implemented by all relevant statutory agencies.

National Action Plan Against Racism (NAPAR) – We welcome the publication of the new and much needed NAPAR in March 2023⁵, and its explicit inclusion of Travellers as being directly covered by all provisions and recommendations in the plan and the acknowledgement of the intersectionality between racism and multiple forms of oppression, in the plan. The NAPAR’s publication is especially pertinent for Travellers, Roma and other minority communities at this time given the recent far-right incited riots in November 2023. We welcome that the plan commits to the collection of ethnically disaggregated data without which it is difficult to fully quantify the prevalence and impact of racism. We call on the State party to ensure the involvement of Traveller and Roma organisations in the plan’s monitoring and implementation structures, and to ensure accountable implementation of Action 3 of the plan which provides for “taking steps to ensure that measures to eliminate the dissemination of hate speech online are effective and have regard to the local context in Ireland.”

National Equality Data Strategy - We welcome the development of the forthcoming National Equality Data Strategy (announced on 21 March 2022) which must focus on measurable impacts, and ask that it be urgently and fully implemented. As part of this Strategy, the full and effective development and implementation of ethnic equality monitoring (in line with human rights standards) across all relevant State departments and public bodies, must be ensured, to improve the ability to monitor the impact of policies and initiatives. We ask that the State ensure the strategy is in place urgently (as expected to cover 2023-2027, as committed to by the State) and that it has a robust implementation and monitoring plan with clear targets, indicators, timeframes and budget lines, with actions being resourced and implemented by all government departments and relevant statutory agencies. It is also important that

⁵ National Action Plan Against Racism, 2023 <https://www.gov.ie/en/publication/14d79-national-action-plan-against-racism/>

the plan is integrated into Equality Budgeting initiative of the Department of Public Expenditure and Reform.

We recommend the State to:

- a) **Conclude and publish the now overdue NTRIS, ensuring an outcome focused approach with a robust monitoring and implementation plan.**
- b) **Ensure the involvement of Traveller and Roma organisations in the NAPAR’s monitoring and implementation structures.**
- c) **Ensure accountable implementation of Action 3 of the NAPAR which provides for “taking steps to ensure that measures to eliminate the dissemination of hate speech online are effective and have regard to the local context in Ireland.”**
- d) **Ensure that the full and effective development and implementation of ethnic equality monitoring (in line with human rights standards) across all relevant State departments and public bodies, as part of the forthcoming National Equality Data Strategy.**

Equal Right of Men and Women - Article 3

Regarding the equal rights of men and men to their enjoyment of all economic, social and cultural rights, the report highlights in particular the Gender Equality and National Strategy for Women and Girls, and the Third National Strategy on Domestic, Sexual and Gender-Based Violence (DSGBV), as well as current data collection challenges associated with measuring the issue, progress and effectiveness of relevant strategies.

Gender Equality & National Strategy for Women and Girls 2017–2020 - Implementation of actions related to Traveller and Roma women in the National Strategy for Women and Girls (NSWG) 2017-2020 and the National Traveller and Roma Inclusion Strategy (NTRIS) was slow and lacked clear targets, indicators or outcomes specific to Traveller and Roma women.⁶ Current drafting of the updated strategies needs to ensure Traveller and Roma women are prioritised in key policy measures. To date, actions related to Traveller and Roma women have not been adequately resourced and the associated implementation plans have failed to define or reach clear gendered targets, indicators, or outcomes.

Violence against Traveller & Roma Women - We welcome the Third National Strategy on Domestic, Sexual and Gender-Based Violence (DSGBV) which recognises the additional challenges such as prejudice and abuse that Traveller and Roma women face in addition to the abuse of DSGBV, which can leave Traveller and Roma women less protected, with poorer access to services. For example, women leaving domestic violence situations should not be subject to satisfying the Habitual Residence Condition to access housing supports and social protections. To date, progress on specific actions naming Traveller and Roma women has been slow, and the associated implementation plan still needs targets, indicators, outcomes and an allocated budget. On foot of the Second National Strategy on DSGBV 2016-2021, Pavee Point received funding for a targeted pilot initiative to address DSGBV. The Project, which has since received multiannual funding, uses a community-based approach to prevent DSGBV in the Traveller community across six counties in Ireland.

It is difficult to measure the extent to which people from Traveller, Roma and other minority ethnic communities experience differential access and outcomes in relation to DSGBV due to the lack of ethnic data collection which would allow for ethnic equality monitoring. There has been resistance to ethnic data collection amongst some State agencies. Delays to implementing universal ethnic identifiers (in line

⁶ In 2019, the Advisory Committee on the FCPNM called on the State to implement both the NTRIS and the NSWG in a coordinated and consistent way and to adopt an implementation plan with clear targets, indicators, timeframes and resources for the Strategies. The State has since adopted an implementation plan for the actions related to Traveller and Roma women.

with a human rights based approach) and embedding ethnic equality monitoring across all relevant data sets remains an issue.

We recommend the State to:

- a) **Ensure robust implementation plans with clear targets and resources to advance the rights of Traveller and Roma women and girls in the next iteration of a National Strategy for Women and Girls.**
- b) **Provide detail of the commitment and approach to prioritising the human rights of Traveller and Roma women in both targeted and mainstream policy measures, in the next National Strategy for Women and Girls.**
- c) **Special measures to address the intersectional racism and discrimination experienced by Traveller and Roma women, including regarding gender, domestic and sexual-based violence, and ensure such measures have clearly defined resources, timeframes, targets, indicators and outcomes.**
- d) **Ensure the Third National Strategy on Domestic, Sexual and Gender-based Violence (DSGBV) includes additional and specific support measures in relation to DSGBV targeted for Traveller and Roma women and ensure they are included in the mainstream measures of the plan. Ensure it has a robust implementation plan, including clear targets, indicators, outcomes, timeframes, accountability and resources relevant to Traveller and Roma women.**
- e) **Recruit members of minority ethnic groups to work in the newly established DSGBV agency, Cuan-operational from 1 January 2024.**
- f) **Agencies and service providers working to tackle DSGBV (an Garda Síochána, TUSLA, women's refuge) to introduce an ethnic identifier and ethnic equality monitoring across all relevant data sets.**
- g) **Ensure Traveller and Roma organisations are actively included and consulted in the work of the new Domestic, Sexual and Gender-based Violence Agency operational 1 January 2024.**

Right to Work- Articles 6; and Right to Just and Favourable Conditions of Work - Article 7

Traveller and Roma Employment - High levels of unemployment persist amongst Travellers and Roma.⁷ This is due to a range of factors including low education attainment, discrimination and being placed in a poverty trap resulting from social welfare issues. In line with the State's 'Programme for Government: Our Shared Future 2020-2025',⁸ and as part of the next iteration of the National Traveller and Roma Inclusion Strategy (NTRIS), we ask that the State develop a comprehensive Traveller and Roma Training, Employment and Enterprise Strategy. We also acknowledge the State's 'Pathways to Work Strategy 2021-2025'⁹ and suggest the development of a gender proofed National Traveller Employment and Enterprise Strategy as part of the new Pathways to Work strategy. We acknowledge the targeted employment supports for minority ethnic groups in the State's 'Pathways to Work Strategy', including the mention of Travellers in the 'Working for All-Leaving No One Behind', chapter. However, there is an urgent need to ensure implementation of these State commitments to deliver and support a range of assistive and targeted measures to increase employment, training and apprenticeship opportunities for Travellers and Roma, to address the significant levels of discrimination in employment faced by Travellers and Roma.

⁷55% of Travellers have experienced discrimination at work, Kelleher et al., *All Ireland Traveller Health Study*, 2010, and the national census repeatedly reported that a disproportionate number of Travellers are unemployed, Central Statistics Office, *Census 2022 Profile 7- Irish Travellers, Ethnicity and Religion*, 2022. 78.9% of Roma feel discriminated against in getting a job and only 16.7% of Roma are employed, in Curran et al., *National Needs Assessment*, 2018. Roma who do not meet the right to reside or Habitual Residence Condition are not considered job seekers and therefore are not eligible for many training and employment supports.

⁸ Department of the Taoiseach, Programme for Government: Our Shared Future- 2020-2025 <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

⁹ Department of Social Protection, Pathways To Work Strategy 2021-2025 <https://www.gov.ie/en/publication/1feaf-pathways-to-work-2021/>

We recommend the State to:

- a) Urgently ensure implementation of the State commitments from the “Programme for Government: Our Shared Future 2020-2025 including to deliver and support a range of assistive and targeted measures to increase employment, training and apprenticeship opportunities for Travellers and Roma, in order to address the significant levels of discrimination in employment faced by Travellers and Roma.**
- b) Develop a comprehensive Traveller and Roma Training, Employment and Enterprise Strategy.**
- c) Develop a gender proofed National Traveller Employment and Enterprise Strategy as part of the new Pathways to Work strategy.**

Right to Social Security - Article 9

Roma and Social Protection - Traveller organisations and groups working with Roma have been actively involved in addressing differential discrimination towards Roma refugees. We call for a proactive stock taking of the particular conditions and special measures to ensure Roma refugees are treated fairly and are afforded equal rights and protections when seeking refuge in Ireland.

In December 2021 the State announced an administrative scheme under the Minister’s executive powers to regularise the status of people living in Ireland long-term without papers. Similar special measures should be adopted by the State for those EU citizens who have been living in the State for a number of years but are not able to satisfy all the conditions of the Habitual Residence Condition (HRC).

We recommend the State to:

- a) Ensure that all children residing in the State, including Roma children, can access Child Benefit payments regardless of the legal or administrative status of their parents.**
- b) Adopt and implement measures to regularise the status of EU citizens living in the state for a number of years but unable to satisfy all the conditions of the Habitual Residence Condition.**

Protection of the Family and Children - Article 10

We continue to have serious concerns about the situation for Traveller and Roma children. 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.¹⁰ Nearly 1 in 2 (49.2%) Roma households with children were not successful in their application for social protection payments, which means they are not receiving Child Benefit and other crucial payments and supports.¹¹ Concerns about Roma child poverty and the discriminatory effect of the Habitual Residence Condition on

¹⁰ 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.

¹¹ 12.7% of Roma women don’t have a Personal Public Service (PPS) number, *Ibid*. A PPS number is a unique reference number used to access public services and social protection services in Ireland. Registration of children is a legal requirement and a birth certificate is necessary to enrol children in school and to apply for a passport. To register a birth, parent/s need photo identification and PPS numbers.

Roma to access basic social welfare payments were previously raised by the Committee and a number of other international human rights bodies.¹²

We recommend that the State mainstream the protection of minority and marginalised groups in its poverty strategy and all in all policies and programmes via the adoption of special measures, such as an exception to the Habitual Residence Condition, for Roma families living in the State, in order to progress the rights of Travellers and Roma. Further, we recommend that the State conduct a review of legislative and policy restrictions, which disproportionately impact Roma access to basic social protections and humanitarian supports and consider extending the regularisation scheme for undocumented Roma EU citizens who have been living in the State on a long-term basis.

Traveller Children	Roma Children
<ul style="list-style-type: none"> • 27% of young people in Oberstown Children Detention Campus are Travellers¹³. • Traveller children make up 12% of those on the at-risk register for child protection and welfare concerns. • Ombudsman for Children investigation in 2021 found a number of serious issues in a site where 66 Traveller children were living, including inadequate sanitation, extreme overcrowding, persistent rodent infestations, inadequate heating systems, unsafe electrical works & high rate of childhood illness caused by the living conditions – this reflects the conditions of many sites across the country. • Infant mortality rate for Travellers is 3.7 times the national rate (14.1 per 1,000 live births compared to 3.9 per 1,000 live births) and 2.8 times the EU average¹⁴ <i>AITHS, 2010</i>. 	<ul style="list-style-type: none"> • According to the 2018 Roma National Needs Assessment: • 1 in 4 Roma children (25%) have gone to school hungry. • Almost half (49.5%) of Roma reported not always having enough food. • Almost 1 in 5 Roma reported begging as a source of income (17.6%) and have no income (14%). • 57.5% report not having enough money for schoolbooks and uniforms. • 24% of women do not access health services while pregnant. • 25.5% of Roma do not have the right to reside and 25.7% of Roma are not habitually resident in Ireland (which limits access to social protection). • Roma face discrimination in accessing accommodation, severe overcrowding, poor and dangerous accommodation conditions, homelessness, and lack of access to social housing and rent supplement¹⁵

Table 3: Overview of issues for Traveller and Roma children

We recommend the State to:

- a) **Set clear and time bound targets specific to poverty reduction among Traveller and Roma children in both targeted policy measures (National Traveller and Roma Inclusion Strategy) and mainstream policy measures.**
- b) **Set targets and measures for preventative measures to address the over-representation of Traveller and Roma children in Oberstown Children Detention Campus, in the State’s child protection and welfare register, and to address accommodation and health inequalities faced by Traveller and Roma children.**

¹² 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.

¹³ According to Oberstown, in 2022, 30 out of the 110 young people detained in Oberstown identified as Travellers.

https://www.oberstown.com/wp-content/uploads/_pda/2023/07/Oberstown-Annual-Report-2022-FINALE.pdf?t=64a6a8119bc58

¹⁴ *All Ireland Traveller Health Study, 2010*.

¹⁵ *Roma National Needs Assessment, 2018*.

Right to an Adequate Standard of Living- Article 11

Child Poverty- Traveller and Roma children experience high levels of poverty (see table above). To address this pervasive issue, clear and time bound targets specific to poverty reduction among Traveller and Roma children needs to be included in both targeted policy measures (including the National Traveller and Roma Inclusion Strategy) and mainstream policy measures (including through the Child Poverty and Wellbeing Programme Office in the Department of the Taoiseach).

Traveller Accommodation - Travellers continue to be overrepresented in homelessness figures, with 39% of Travellers meeting European definition of homelessness (European Typology of Homelessness and housing exclusion (ETHOS)).¹⁶ According to Census 2022,¹⁷ 14% of Irish were without permanent accommodation and thus living in ‘temporary’ housing. “Temporary units’ effectively means Traveller families and children are living on the side of the road, without access to basic facilities. The Irish Human Rights and Equality Commission supports the analysis of Traveller homelessness, stating that “members of the Traveller Community are the most at risk of being homeless” and face further racism and discrimination in accessing housing in the public and private rental sector¹⁸. Traveller women spend more time at home and bear the brunt of the impact of poor and unsafe accommodation conditions.

Local Authorities continuously fail to meet their legal duty to ensure adequate, safe and culturally appropriate accommodation for Travellers and - despite the Traveller accommodation budget having slowly increased - in the past, a significant portion of Traveller accommodation budgets remained unspent by Local Authorities. For the first time since 2014, ‘full spend of the Traveller accommodation budget has been achieved for the past several years - 2020, 2021 and 2022’.¹⁹ However, it should be noted that the budget was spent on maintenance of existing Traveller accommodation and COVID-19 mitigation measures; no new accommodation or units were provided.

We welcome the Department of Housing’s Budget 2024 package, which includes €21 million to deliver Traveller-Specific Accommodation²⁰ and recommend that the State ensure that the full funding allocated to local authorities for Traveller specific- accommodation is being spent for that purpose and is fully utilised, including the development of new accommodation. We acknowledge the ‘Housing for All: A New Housing Plan for Ireland to 2030’,²¹ which includes specific targeted measures for Travellers. Further, measures to address the intersectional impact of homelessness, particularly by gender, must be included when implementing any actions relating to homelessness among Travellers and Roma.

In 2019, an independent Expert Group on Traveller Accommodation²² made 32 recommendations for the Government, including a recommendation to overhaul all relevant legislation and policies which impact on accommodation provision for Travellers. A Programme Implementation Board was established to progress the implementation of the recommendations of the Expert Review Group. We recommend that the State ensure full implementation of all 32 recommendations by the Independent Expert Group on Traveller accommodation through the Implementation Board with a time lined implementation plan, tangible targets, corresponding accountability measures and budget. Also, in order to address the housing and homelessness crisis amongst Travellers, the State needs to introduce clear actions and an

¹⁶ Pavee Point (2021) The Traveller Community and Homelessness <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf> - European Typology of Homelessness and Housing Exclusion-ETHOS) - this includes the large number of Travellers who experience ‘hidden homelessness’ in overcrowded living conditions

¹⁷ Central Statistics Office, 2022.

¹⁸ IHREC Discrimination and Inequality in Housing in Ireland, 2018

¹⁹ <https://debatesarchive.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2023032100085#WRX00800>

²⁰ <https://www.oireachtas.ie/en/debates/question/2023-12-07/section/80/>

²¹ Housing for All: A New Housing Plan for Ireland, 2021 <https://www.gov.ie/en/publication/ef5ec-housing-forall-a-new-housing-plan-for-ireland>

²² Traveller Accommodation Expert Review (2019) <https://www.paveepoint.ie/wp-content/uploads/2019/07/Expert-Review-Group-Traveller-Accommodation.pdf>

associated implementation plan and resources in the forthcoming National Traveller and Roma Inclusion Strategy and through the inclusion of Travellers in wider and mainstream Government policy and measures targeting homelessness.

Roma and accommodation - Inadequate and insecure housing, sanitary and living conditions also expose many Roma, particularly Roma women and children to further health and safety hazards and interruptions in school attendance. While there are currently no Roma specific housing actions in the existing National Traveller and Roma Inclusion Strategy (NTRIS), we welcome the State's commitment to include specific actions in its next iteration of NTRIS.

We ask that the State introduce a broad and holistic understanding of 'at risk of homelessness' based on the European ETHOS definition of homelessness and ensure that the State's obligations to support those at risk of homelessness is enshrined in law. We also ask that any amendments to the local connection criteria are assessed to ensure that further barriers are not created for particularly marginalised groups, including Travellers and Roma. Finally, based on the State's legal obligations under the Public Sector Duty and International Human Rights law, we ask that the State reconsider the introduction of eligibility criteria, requiring habitual residence as a condition for access to section 10 funded emergency, due to the discriminatory impact of this regulatory barrier on the Roma community.²³

- 39% of Travellers meet the European definition of homelessness²⁴.
- Many Travellers are forced into standard social housing or private rented accommodation due to lack of Traveller specific accommodation provision.
- An Equality Review²⁵ conducted by the Irish Human Rights and Equality Commission shows that between 2008 and 2018, only 2/3 of the allocated (€168.8 million) budget for Traveller accommodation was drawn down by Local Authorities.²⁶
- Substandard accommodation conditions, lack of access to electricity, running water, sewage facilities amongst others continue to be issues on Traveller specific accommodation sites.
- Roma face discrimination in accessing accommodation; severe overcrowding; poor and dangerous accommodation conditions; homelessness; and lack of access to social housing and rent supplement - 6.6% of Roma report to be currently homeless and almost half (45.7%) have been homeless at some stage; 1 in 5 Roma (24%) lived in households of 8 or more people; Almost half (44.8%) of Roma did not have enough beds in their accommodation²⁷.

Table 4: Traveller and Roma accommodation issues at a glance

We recommend the State to:

- Implement all 32 recommendations issued by the independent Expert Group on Traveller Accommodation with a time lined implementation plan, tangible targets, corresponding accountability measures and budget.**
- Address the homelessness and housing crisis among Roma by introducing clear actions and an associated implementation plan and resources.**

²³ <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Consultation-on-Proposed-Amendments-to-the-Homelessness-Related-Aspects-of-the-Housing-Act-1988-1-1.pdf>

²⁴ Pavee Point (2021) The Traveller Community and Homelessness <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf> - European Typology of Homelessness and housing exclusion-ETHOS) - this includes the large number of Travellers who experience 'hidden homelessness' in overcrowded living conditions

²⁵ IHREC (2021) Accounts of First Council by Council Equality Review of Traveller Accommodation <https://www.ihrec.ie/accounts-of-first-council-by-council-equality-review-on-traveller-accommodation-in-history-of-state-published/>

²⁶ In 2019, the Commission invited each of the 31 local authorities in the State to undertake a review of their provision of Traveller accommodation. The local authorities were invited to conduct a review of the practices, procedures and other relevant factors in relation to the drawdown of capital funding and the provision of Traveller-specific accommodation services, IHREC, [Equality Review- Provision of Traveller Accommodation by Local Authorities](#), 2021.

²⁷ 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.

- c) **Include Traveller and Roma specific targets in wider Government policy responding to homelessness.**

Right to Physical and Mental Health- Article 12

Traveller and Roma Health - Travellers and Roma continue to experience stark health inequalities when compared to the general population,²⁸ and the COVID-19 pandemic has had a disproportionate impact, with both communities experiencing significantly higher rates of mortality and morbidity.²⁹ As a result of the COVID-19 pandemic and the recognition of the urgent need to address Roma health inequalities, a positive development 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.

We acknowledge and welcome the publication of the National Traveller Health Action Plan (NTHAP) 2022-2027 and associated resources and implementation structures. This is an ambitious plan and holds potential to have an impact on Traveller health experiences and outcomes, if fully resourced and implemented. The Plan also commits to the implementation of ethnically disaggregated data to monitor and identify Traveller, participation, and outcomes in health. We ask that the State fully resource and implement the Plan and continue resourcing and supporting further development of special measures to address Traveller and Roma health inequalities. There is also an urgent need for a universal ethnic identifier (in line with a human rights based approach) to be fully implemented and health indicators developed to monitor and identify Traveller and Roma access, participation, and outcomes in health.

We recommend the State to:

- a) **Fully implement and resource the National Traveller Health Action Plan.**
- b) **Implement ethnic equality monitoring across all routine administrative data collection systems to support the development of health indicators to monitor Traveller and Roma access, participation and outcomes in health.**
- c) **Continue supporting and further developing both mainstream and special measures to address Roma health inequalities.**
- d) **In line with the State's 'Programme for Government: Our Shared Future 2020-2025', we continue to call for the development of a Traveller Mental Health Strategy.**

Right to Education- Articles 13-14

Traveller and Roma Education - In 2020, the State made several educational commitments in its Programme of Government,³⁰ including to develop a National Traveller Education Strategy and to further develop access programmes to Higher and Further education for students from disadvantaged groups, including members of the Traveller community, those in direct provision and those who are socio-economically disadvantaged.

²⁸ Infant mortality rate for Travellers is 3.5 times the rate of the general population, in Kelleher et al., 2010. In a quarter of Roma households women have not accessed a doctor or hospital during pregnancy; in 36% of Roma households women have difficulty accessing maternity services; and in 24.6% of households women don't seek medical attention before birth but access a hospital for the first time to give birth, in Curran et al., 2018.

²⁹ HIQA (2021) HIQA finds Travellers are at increased risk of infection and severe disease from COVID-19 [Online]. Available at <https://www.hiqa.ie/hiqa-news-updates/hiqa-finds-travellers-are-increased-risk-infection-and-severe-disease-COVID-19>. Accessed 20/8/2022.

³⁰ Department of the Taoiseach, Programme for Government: Our Shared Future- 2020-2025 <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

We acknowledge the ongoing development of the National Traveller and Roma Education Strategy³¹, the consultation process of which began in July 2023 and the next stage of which is consultation with Traveller and Roma and representative organisations in 2024. The National Traveller and Roma Education Strategy must include a robust implementation and monitoring framework and resources to address the educational disadvantage of Travellers at all educational levels. In this regard, we welcome the additional dormant accounts funding to support access to third level education for members of the Traveller and Roma communities and care leavers, in addition to financial support for an apprenticeship bursary scheme.³²

We welcome both the National Council for Curriculum and Assessment's (NCCA) 2019 curriculum audit of Early Years, Primary and Post-Primary levels on Traveller history and culture³³ and the NCCA research report³⁴ and urge clear timelines and accountable parties to ensure the implementation of both, in practice. We acknowledge the recommendations of: 'A Study into the Effectiveness of the Anti-Bullying Procedures on Traveller and Roma Pupils' Experiences in the School System'³⁵ report and the Department of Education's report, *Cineáltas: Action Plan on Bullying*,³⁶ and urge their rapid implementation in schools.

We also welcome the National Access Plan³⁷ which set higher education targets for Travellers and Roma in higher education,³⁸ the *National Access Plan: A strategic Action Plan for Equity of Access, Participation and Success in Higher Education 2022-2028*. The establishment of a National Tertiary Office may also present new possibilities.

However, none of the mainstream educational strategies contain actions aimed directly at increasing Traveller participation at early years, primary or post-primary levels despite their significant educational disadvantage at all levels. While we are conscious of the progress with collecting and using ethnic data in further and higher education, we fear that this progress will fall short in the absence of a clear framework, targets and ethnic data which would promote and track school retention and completion rates at other education levels, and in particular at post-primary level. The National Traveller and Roma Education Strategy currently being developed is crucial in this regard.

Digital inclusion - In the context of digital inclusion, three issues relating to social determinants are highlighted, including poor accommodation, education inequality and income poverty. Travellers and Roma experience high levels of education inequality. Furthermore, Travellers have had long-standing issues around accommodation and lack of implementation of policy in this area. There are specific issues for Travellers and Roma who experience homelessness, accommodation insecurity and/or live in substandard accommodation. This has a particular impact on digital inclusion in many

³¹ Traveller and Roma Education Strategy <https://www.gov.ie/en/consultation/2545f-traveller-and-roma-education-strategy/>

³² Minister Harris announces funding of €1.15 million to support Care Leavers and members of the Traveller and Roma communities <https://www.gov.ie/en/press-release/e2a6a-minister-harris-announces-funding-of-115-million-to-support-care-leavers-and-members-of-the-traveller-and-roma-communities/>

³³ Traveller culture and history in the curriculum: a curriculum audit, NCCA, 2019 <https://ncca.ie/en/resources/traveller-culture-and-history-in-the-curriculum-a-curriculum-audit/>

³⁴ Traveller culture and history research report, NCCA, 2023 <https://ncca.ie/en/resources/traveller-cultureand-history-research-report/>

³⁵ A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system, Dr. Maeve Dupont, DCU Anti-Bullying Centre, March 2022, available at <https://antibullyingcentre.ie/wpcontent/uploads/2022/03/A-study-into-the-effectiveness-of-the-Anti-Bullying-Procedures-on-Traveller-and-Roma-pupils-experiences-in-the-school-system.pdf>

³⁶ <https://www.gov.ie/en/publication/52aaf-cinealtas-action-plan-on-bullying/>

³⁷ National Access Plan: A Strategic Action Plan for Equity of Access, Participation and Success in Higher Education 2022-2028.

<https://hea.ie/policy/access-policy/national-access-plan-2022-2028/#:~:text=The%20National%20Access%20Plan%20continues,on%20participation%20and%20student%20success.>

³⁸ This is being progressed through Equity of Access to Higher Education Access Plan 2015-2019 and the Progress Review of the National

Plan for Equity of Access to Higher Education and the priorities to 2021 (para. 325).

ways, including for example access to broadband, access to devices, and ensuring privacy and protect.

Given the current policy direction towards digitalisation and service providers increased use of and reliance on technology through the COVID-19 pandemic, the human rights implications of digitalisation – including risks, benefits, and protections – need to be high on the agenda. Key to this will be ensuring digital inclusion and leaving no one behind, by starting with those most marginalised and addressing the digital divide for minority ethnic groups, including Traveller and Roma women. In the context of public services, “digital first” cannot mean digital only, and investment will need to continue in non-digital service provision. Leaving no one behind means including those most at the margins and working in partnership with Travellers and Roma in the digitalisation process.

We recommend the State to:

- a) Urgently complete development of the National Traveller and Roma Education Strategy and ensure the Strategy has robust implementation and monitoring framework with associated dedicated targets, indicators and resources to address the educational disadvantage of Travellers and Roma at all educational levels.**
- b) Include those most at the margins in digital literacy and digitalisation process in service provision, , work in partnership with Travellers and Roma, and continue to invest in non digital service provision.**

Cultural Rights -Article 15

Recognition of Traveller Ethnicity - In its Concluding Observations (8 July 2015) on the State party’s third periodic report, the Committee observed the State party’s long-standing non-recognition of Travellers as an ethnic minority. Traveller organisations campaigned for many years for the State’s official acknowledgement of Traveller ethnicity, and this was achieved in 2017. This was a vital step in tackling anti-Traveller racism and acknowledging Travellers’ right to cultural identity. Acknowledgement of Traveller ethnicity needs to open a new dialogue as to how the State interacts with Travellers and Roma into the future.

Hate Speech - We have welcomed the State’s progress in relation to the current revision of the hate speech, hate crime and equality legislation and the Criminal Justice (Incitement to Violence or Hate speech and Hate Offences) Bill in October 2022, and in particular, the explicit recognition of Traveller ethnicity in the main definitions in the new law. This is now more necessary than ever, in light of the violent, far-right ignited riots that took place in Dublin in November 2023, with the State acknowledging that incitement to hatred legislation was not up to date.³⁹ We ask the State to consider the introduction of a dedicated Action Plan Against Hate alongside the legislation to address hate crime and hate speech, in particular, against women, including Traveller and Roma and other women from minority groups.

In this regard, we urgently ensure implementation of the ‘Online Safety and Media Regulation Act 2022’ which commenced on 15 March, 2023 and implementation of online safety codes in regard to hate speech via the new multi-person media commission (to be known as Coimisiún na Meán) that was formally established.

We recommend the State to:

- a) Open a new dialogue as to how the State interacts with Travellers and Roma into the future.**
- b) Develop and implement an awareness raising campaign with the general population about anti-Traveller and anti-Roma racism and provide support towards the celebration of Traveller and Roma cultures on a permanent and ongoing basis.**

³⁹ <https://www.reuters.com/world/europe/irish-pm-pledges-modernise-laws-against-hatred-after-dublin-riots-2023-11-24/>

- c) Develop and deliver positive action measures to build better relations between Travellers, Traveller organisations and local media, including measures to challenge negative stereotyping of Travellers and Roma, including Traveller and Roma women, and improved representation by Traveller and Roma in local media.**
- d) Ensure that the inclusion of Traveller culture and history in school curriculum takes place in active consultation with Traveller organisations and acts as a precedent for further inclusion of all the cultures which are part of the diversity in Irish society.**
- e) Implement the findings and recommendations of the Irish Human Rights and Equality Commission (IHREC) equality reviews of Traveller accommodation including regarding the provision of Traveller specific and culturally appropriate accommodation for Traveller families.**
- f) Consider the introduction of a dedicated Action Plan Against Hate alongside the legislation.**
- g) Urgently ensure the implementation of the 'Online Safety and Media Regulation Act 2022 and the implementation of online safety codes via the new media commission.**

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List of Abbreviations

AITHS	All Ireland Traveller Health Study
DSGBV	Domestic, Sexual and Gender Based Violence
ESRI	Economic and Social Research Institute
ETHOS	European Typology of Homelessness and Housing Exclusion
EU	European Union
HRC	Habitual Residence Condition
NAPAR	National Action Plan Against Racism
NCCA	National Council for Curriculum and Assessment
NSWG	National Strategy for Women and Girls
NTHAP	National Traveller Health Action Plan
NTRIS	National Traveller and Roma Inclusion Strategy