



Joint Submission to the Department of Children, Equality, Disability, Integration and Youth on the next National Strategy for Women and Girls, October 2024.

The **National Traveller Women's Forum** is the National Network of Traveller women and Traveller women's organisations from throughout Ireland. We recognise the particular oppression of Traveller women in Irish society and are working to address this issue through the provision of opportunities to Traveller women to meet, share experiences, ideas and develop collective strategies and skills to work towards the enhancement of their position in society.

Pavee Point Traveller and Roma Centre is a national non-governmental organisation committed to the attainment of human rights for Irish Travellers and Roma in Ireland. Established in 1985, the organisation comprises Travellers, Roma and members of the majority population working in partnership to address the needs of Travellers and Roma, who as minority ethnic groups experience exclusion and marginalisation. The aim of Pavee Point is to contribute to improvement in the quality of life and living circumstances of Irish Travellers and Roma by working for social justice, solidarity and human rights.

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Introduction

About this Submission

This submission highlights priority issues for Traveller and Roma women and girls in Ireland to inform the development of the successor National Strategy for Women and Girls (NSWG II). The submission identifies issues and recommendations to progress the socioeconomic, political and cultural situation of Traveller and Roma women in Ireland. This includes the need for a strong implementation framework, ring-fenced multi annual funding from DCEDIY, and other Departments linked to targets and timelines if it is to be successful in delivery on key commitments and priority actions.

Context to Traveller and Roma Women in Ireland

As minority ethnic women, Traveller and Roma women constitute one of the most marginalised and excluded individuals and groups in Ireland¹. They face additional marginalisation in comparison to Traveller and Roma men and women in the general population due to intersectional discrimination based on gender, ethnicity, socioeconomic status and other factors. A number of international human rights monitoring bodies and instruments have consistently raised concerns in relation to the exclusion and marginalisation of Traveller and Roma women and girls in Ireland and have urged the State to take proactive measures, both targeting and mainstreaming to ensure equality of access, participation and outcomes across all policy areas.

1. Development Implementation, Monitoring and Evaluation of the NSWG

For the first time, The National Strategy for Women and Girls (NSWG) 2017 – 2021 contained actions related to Traveller and Roma women. While a welcome development, a number of actions relied solely on the implementation of gender actions in the National Traveller and Roma Inclusion Strategy (NTRIS). As NTRIS did not have an implementation plan, actions related to Traveller and Roma women in the NSWG were not progressed. In 2019, the Advisory Committee on the Framework Convention on National Minorities urged the State to implement the NTRIS and NSWG in a coordinated and consistent way, however this did not occur.² Targeted objectives and actions to address the exclusion and marginalisation of Traveller, Roma and other minority women must be cross cutting throughout and embedded within mainstream actions of the Strategy.

Recommendations:

- Ensure Traveller and Roma specific objectives, actions, targets, outcomes, indicators, timeframes and budgetary lines (including specific gender budgets within each Government Department and State Agency) within NSWG.
- Engage in active and meaningful consultation with Traveller organisations and groups working with Roma in the development, implementation, monitoring and evaluation of the next NSWG.
- Ensure specific actions related to Traveller and Roma women in NSWG and NTRIS II are implemented in a consistent and coordinated way.
- Ensure wider mainstream recommendations are monitored for impact for Traveller and Roma women and girls.
- Incorporate advisory and appropriate decision-making powers into the consultative and monitoring structures of NSWG and ensure Traveller and Roma women's representation on the oversight structures of NSWG.
- Equality proof budgetary decisions in a systematic and transparent way in partnership with Traveller organisations and groups working with Roma.

¹ Irish Travellers are an indigenous ethnic group in the island of Ireland with shared cultural tradition, practices, beliefs and language. Under international definition, Irish Travellers belong to the umbrella group of 'Roma'.

² Advisory Committee on the Framework Convention for the Protection of National Minorities, *Fourth Opinion on Ireland adopted on 10 October 2018*, ACFC/OP/IV(2018)005, Strasbourg, Council of Europe.

- Allocate and ring-fence adequate human and financial resources to specific programming related to the social inclusion of Traveller and Roma women in education, training, employment, health, accommodation, violence against women, and local and community development initiatives, including the resourcing of Traveller organisations and groups working with Roma women.
- Develop targeted supports to increase Traveller and Roma women’s engagement in national social inclusion programmes.

2. Disaggregated Data by Ethnicity & Gender

Lack of disaggregated data by ethnicity and gender results in failure to provide an ongoing evidence base of the situation of Traveller and Roma women, and in failure to undertake comprehensive human rights and equality proofing of State policies, budgets and programming. Concerns at the lack of disaggregated data in formulating and monitoring policy and programming have been raised by various human rights bodies, including UN CEDAW, CRC and CESCR.³ This was also highlighted in the review of the NSWG,⁴ commissioned by the Department of Children, Equality, Diversity, Inclusion and Youth.

Section 42 of the Irish Human Rights and Equality Commission Act 2014 mandates all public bodies to take proactive steps to assess and promote equality, protect human rights and eliminate discrimination.⁵ While progress has been made with some Government Departments and State Agencies,⁶ there have been major issues and resistance to progress ethnic data collection with others.⁷ As a result, there are existing gaps in statistical data on the situation of Travellers and Roma women.

Recommendations:

- Collect, analyse and disseminate disaggregated data by ethnicity and gender across all administrative systems and statutory services in line with human rights standards.
- Ensure policy and practice alignment with forthcoming National Data Strategy.

3. Anti-Traveller and Anti-Roma Discrimination and Racism

Traveller and Roma women experience high levels of discrimination and racism at individual and institutional levels. Roma women are highly vulnerable to racism, particularly women who are more easily identifiable as Roma.⁸ In 2020, the EU Fundamental Rights Agency (FRA) conducted a survey on the Situation of Travellers in Ireland as part of a wider EU study. They found that among all surveyed Traveller and Roma groups, Irish Travellers (52%) have the third highest rate of hate-motivated

³ UNCEDAW, *concluding observations on the combined sixth and seventh periodic reports of Ireland*, CEDAW/C/IRL/CO/6-7, 9 March 2017; UNCRC, *Concluding observations on the combined third and fourth periodic reports of Ireland*, CRC/C/IRL/CO/3-4, 1 March 2016; UNCESCR, *Concluding observations on the third periodic report of Ireland*, E/C.12/IRL/CO/3, 8 July 2015.

⁴ The Centre for Effective Services (CES), *Realising the promise of national equality policy: an evaluation of the processes of implementation of three national equality strategies*, May 2023.

⁵ *Irish Human Rights and Equality Commission Act 2014*, Section 42.

⁶ The Central Statistics Office has included Travellers as an administrative category in the Census since 2006, and Roma were included in Census 2022. Progress has also been made with ethnic data collection with National Social Inclusion Programmes.

⁷ An Garda Síochána and the Courts Service report that there is ‘no legal basis for ethnic data to be collected’ and that ethnic data is not relevant to their services. Where steps have been taken to disaggregate data by ethnicity by some state agencies, it hasn’t always taken place in line with human rights standards. For instance, a small number of health service providers have introduced ethnic identifiers. However, ethnic categories are not standardised; ethnic identity is often ascribed to Travellers and Roma by using proxies such as name or looks; and the data is not disaggregated, analysed or provided to stakeholders within an appropriate timeframe.

⁸ Sometimes Roma are identifiable through a particular style of dress associated with Roma. This reflects a limited understanding of Roma identity, narrowly linked to dress code and not cognisant of the diversity within the community.

harassment such as offensive comments on the street or online.⁹ We welcome the progress made on the Incitement to Violence or Hatred Bill, however, regret the government decision to abandon new and long-awaited hate speech legislation.

We also welcome the publication of the National Action Plan against Racism last year, and its 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 including gender.¹⁰

Recommendations:

- Ensure that NAPAR is afforded ring-fenced multi-annual funding to support implementation and delivery of the Plan; that it has a strong monitoring framework, is inclusive of special measures to address the intersectional racism and discrimination experienced by Traveller and Roma women and is implemented in partnership with Traveller and Roma organisations.
- Undertake special measures to address the intersectional racism and discrimination experienced by Traveller and Roma women and ensure such measures have clearly defined resources, timeframes, targets, indicators and outcomes.
- Reinstate Section 2 on hate speech to the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022.¹¹
- Finalise the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 and prioritise its full implementation.

4. Education

We welcome the recent development and launch of the National Traveller and Roma Education Strategy along with the first of three implementation plans¹² and prior to that the new National Access Plan for Equity of Access in Higher Education which set higher education targets for Travellers and Roma in higher education¹³ along with other education commitments and developments¹⁴. The robust implementation of both strategies with accurate data to support monitoring, setting post-primary targets, allocation of targeted resources will be required to address the educational disadvantage of Traveller and Roma women at all educational levels.

⁹ European Agency for Fundamental Rights, Travellers in Ireland, 2019,

https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-roma-and-travellers-survey-country-sheet-ireland_en.pdf.

¹⁰ National Action Plan Against Racism, 2023 <https://www.gov.ie/en/publication/14d79-national-action-plan-against-racism/>

¹¹ Traveller and Roma women and girls are adversely impacted by hate speech in their daily lives as are other ethnic minority women - this is something that was recognised in the Department's consultation process with Traveller NGOs and wider civil society groups: <https://www.oireachtas.ie/en/bills/bill/2022/105/>.

¹² Traveller and Roma Education Strategy, 2024,

<https://www.gov.ie/en/consultation/2545f-traveller-and-roma-education-strategy/>.

¹³ National Access Plan: A Strategic Action Plan for Equity of Access, Participation and Success in Higher Education 2022-2028, 2022,

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

¹⁴ Additional dormant accounts funding to support access to third level education for members of the Traveller and Roma communities (DFHERIS)

<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/>, financial support for an apprenticeship bursary scheme, dormant account funding for Traveller organisations engaging in education work (DCEDIY), the National Council for Curriculum and Assessment's (NCCA) 2019 curriculum audit of Early Years, Primary and Post-Primary levels on Traveller history and culture and the subsequent NCCA research report <https://ncca.ie/en/resources/traveller-cultureand-history-research-report/>, expansion of DEIS programme <https://www.gov.ie/en/publication/a3c9e-extension-of-deis-to-further-schools/> expansion of allocation of HSCL teachers in non DEIS schools with significant Traveller and Roma pupils.

We note the recommendations of a 2022 study into the Effectiveness of the Anti-Bullying Procedures on Traveller and Roma Pupils' Experiences in the School System¹⁵ and the Department of Education's Cineáltas: Action Plan on Bullying,¹⁶ the urgent implementation of which could have a significant impact on the experience of discrimination of Traveller and Roma girls in school.

Recommendations:

- Implement the National Traveller and Roma Education Strategy with targets to address the educational disadvantage experienced by Traveller and Roma women and girls at all educational levels.
- Promote the Early Childcare and Education (ECCE) pre-school scheme within the Traveller and Roma communities to facilitate access to free pre-school and access to full time care in line with children whose parents are in paid employment.
- Ensure the costs associated with attending school do not act as a barrier to Traveller and Roma children realising their right to education.
- Provide targeted support for Traveller and Roma women undertaking part-time study at third level.
- Establish a publicly funded early years education and care sector and move away from a model that is reliant on private providers.

5. Employment

Traveller and Roma women experience high levels of unemployment due to racism, discrimination, low educational attainment, childcare and family commitments, and being placed in a poverty trap due to welfare issues. Roma women who do not meet the right to reside or habitual residence condition are not considered jobseekers and therefore are not eligible for many training and employment supports. 81.6% of Roma women report feeling discriminated against in getting hired, and 55% of Travellers have experienced discrimination at work.¹⁷ High cost of childcare acts as a major barrier for Traveller and Roma women to access employment, further education and training¹⁸. Many women also fear losing secondary benefits, in particular the Medical Card¹⁹.

We acknowledge the state commitment in 'Programme for Government: Our Shared Future 2020-2025' to develop a Traveller and Roma Training, Employment and Enterprise Strategy and the targeted employment supports for minority ethnic groups in the State's Pathways to Work Strategy. Implementation of these commitments inclusive of a gender analysis and approach is required to deliver and support a range of assistive and targeted measures to increase employment, training and apprenticeship opportunities for Traveller and Roma women.

Recommendations:

¹⁵ [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.

¹⁶ [Cineáltas: Action Plan on Bullying](#), 2022.

¹⁷ Kelleher et al., All Ireland Traveller Health Study, University College Dublin & Department of Health & Children, 2010; Curran, S., A. Crickley, R. Fay, F. McGaughey (eds), Roma in Ireland – a National Needs Assessment, Department of Justice and Equality, 2018.

¹⁸ Ireland has the highest childcare costs in the EU as a percentage of family income, making it inaccessible for many Traveller and Roma women. OECD, *Benefits and Wages: Statistics*, 2014, cited in Irish Human Rights and Equality Commission Submission to the UN Committee on Economic Social and Cultural Rights, June 2015, www.ihrec.ie.

¹⁹ Within the context of poor health outcomes for Traveller and Roma women, this fear is not unfounded. Kelleher et al., 2010 (2); Curran, et al., 2018 (2).

- Adopt special measures to ensure Traveller and Roma women can access affordable childcare; retain secondary benefits while participating in training; and given their health inequalities can retain medical cards for a set period after entering employment.
- Develop a comprehensive Traveller and Roma Training, Employment and Enterprise Strategy.
- Resource targeted employment and training measures for Traveller and Roma women to increase access and engagement in mainstream employment, training, apprenticeship and traineeships.
- Introduce accessible English language support to support Roma women to participate in the labour market.
- Continue to support paid internships for Traveller and Roma women in Government Departments, Local Authorities and other public bodies.
- Pilot an employment and training programme for Roma women who are not habitually resident to provide opportunities for employment.

6. Economic and Social Benefits

Many Roma women in Ireland are unable to access any social protection due to the implementation of right to reside, European Directive 2004/38, and habitual residence condition (HRC), policy by the Department of Social Protection. Under the European Directive Roma women have a right of residence without restriction for three months.²⁰ 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.²¹ The right to reside and HRC can also impact access to medical cards when women cannot prove their means. Roma women face significant difficulties with proving residency in the State with lack of documentation, proof of address and language and literacy skills. Concerns about the discriminatory effect of the HRC on Travellers, Roma and victims of domestic violence have been raised by the Special Rapporteur on extreme poverty and human rights, European Commission against Racism and Intolerance, UNCRC, HRC, and CESCR.²²

Recommendations:

- Review the application of the right to reside and habitual residence condition in consultation with Traveller and Roma representative organisations to ensure compliance with Ireland's human rights obligations.
- Make Child Benefit payments a truly universal payment that is not contingent on the fulfilment of the habitual residence condition²³
- Provide support to Roma in ensuring documentation for social protection and PPS number applications, and investigate alternative/complementary models of evidencing eligibility, rights and entitlements.
- Set targets for reducing Traveller and Roma women and girls' poverty in key mainstream policy initiatives related to poverty, social inclusion, and employment.

²⁰ Under the European Directive 2004/38 every EU citizen has a right of residence in another member state for up to three months. They have a right of residence for more than three months if they: are workers or self-employed in the member state; have sufficient resources for themselves and their families so as not to become a burden on the social assistance system of the host state and have comprehensive sickness insurance cover; are enrolled at a private or public establishment for study purposes and have sufficient resources for themselves and their families so they are not a burden on the social assistance system; or are family members accompanying or joining the Union citizen who satisfies the above conditions as appropriate. European Union (n 137)

²¹ The habitual residence test is intended to evaluate if a person has a connection with the Irish State Department of Social Protection *Habitual Residence Condition*. Available at: <http://www.welfare.ie/en/downloads/sw108.pdf>.

²² 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), 2013, Para 130; CRC, 2015; HRC, 2014; CESCR, 2015.

²³ Recommended by: United Nations Committee on the Rights of the Child, *Concluding observations on the combined third and fourth periodic reports of Ireland*, 1 March 2016, UN Doc: CRC/C/IRL/CO/3-4N, para. 70(f).

7. Accommodation

The persistent and deteriorating accommodation crisis among Travellers and Roma has been exacerbated by Ireland's ongoing housing and homelessness crisis. Traveller and Roma women spend more time at home and bear the brunt of the impact of poor and unsafe accommodation conditions. There are significant concerns regarding the proposed amendments to the Housing Act 1988.

Traveller Accommodation

The appropriate type and standard of Traveller accommodation impacts greatly on life expectancy and on all other aspects of Traveller women's lives.²⁴ Research shows that 39% of Travellers meet the European definition of homelessness (European Typology of Homelessness and Housing Exclusion - ETHOS) as this includes a large number of Travellers who are experiencing 'hidden homelessness' in overcrowded living conditions. This is compared to 6% of the general population. Traveller women account for approximately 50% of the overall Traveller adult homeless²⁵ population. This includes Traveller women who have experienced or are experiencing domestic violence.²⁶ The Housing (Miscellaneous Provisions) Act 2002 gives additional provision to evict Travellers living on unauthorised sites or on roadside with little or no basic services including access to water or sanitation, while waiting to be accommodated by Local Authorities is of concern and has been highlighted by numerous human rights bodies and European institutions. Despite significant national and local Traveller accommodation infrastructure, a slowly increasing budget and a full spend of Traveller Accommodation budgets since 2020 implementation has been slow. Spend is focused on maintenance of existing Traveller accommodation rather than the provision of new units to meet existing and projected needs.

Roma Accommodation

Nine in ten Roma in Ireland report experiencing discrimination when accessing accommodation. Many Roma live in poor quality accommodation and live in severely overcrowded conditions and in unsafe abandoned buildings. Almost half of Roma in Ireland have experienced homelessness in their lives, and due to the restrictive criteria of accessing emergency housing and homelessness services, many resort to staying in overcrowded conditions and living in abandoned buildings or warehouses. Of significant concern is the proposed amendments relating to homelessness in the Housing Act 1988, which seeks to introduce further restrictions via eligibility criteria to access emergency accommodation. The habitual residence condition as an eligibility requirement, a condition not present in Irish legislation, already causes a disproportionate discriminatory impact on marginalised groups in Ireland. The introduction of these eligibility requirements will undermine the State's efforts to meet its international human rights obligations which it has committed to in NTRIS II.

Recommendations:

- 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, with priority given to the recommendation to establish the Traveller Accommodation Authority.

²⁴ The significantly high number of families living without permanent accommodation or inadequate accommodation has consequences for Traveller women. Women spend more time in the home and are the primary carers so they bear the brunt of having to cope with basic conditions such as lack of clean running water, lack of adequate refuse collection, poor sanitation and unsafe areas for children to play.

²⁵ Harvey, B. (2021) Pavee Point Commissioned Research: The Traveller Community and Homelessness. Dublin: Pavee Point Traveller and Roma Centre.

²⁶ Tusla's draft literature review cites the interconnection between domestic violence and homelessness and sources for such evidence domestically and internationally, in Flynn, A., and C. Crowley, Somewhere Safe, Informing Ireland's Provision of Domestic Violence Emergency Accommodation through an International Lens, Final Draft Number 3, January 2020.

- Reinstate and ring-fence Traveller accommodation budget to 2008 levels²⁷.
- Place a moratorium on evictions until accommodation needs of Travellers have been met.
- Abolish Section 24 of the Housing Miscellaneous Act 2002 (better known as the trespass legislation) which adversely impacts the lives of Traveller women and girls and criminalises Traveller nomadism.
- Undertake an independent national assessment of the current Traveller accommodation crisis and to review the accommodation and housing needs and conditions of Traveller and Roma women, particularly among those affected by domestic violence and drug and alcohol misuse.
- Undertake special measures in accommodation plans and policies to ensure that Traveller and Roma women's accommodation and housing needs are met.

8. Women in Detention

Although Travellers account for 0.6% of the overall population in Ireland, they account for 22% of the female prison population²⁸. The risk for a Traveller woman being imprisoned is 18 to 22 times higher than that of the general population²⁹. The majority of Traveller women in detention are sent to prison for non-violent, poverty related offences³⁰. They have a background of social and educational disadvantage, unemployment, homelessness, illiteracy, racial discrimination, mental health issues and/or drug and alcohol dependency. Most Traveller women in prison have also experienced domestic violence from a current or previous partner.³¹

The Irish Prison Service Strategic Plan 2016-2018 and Joint Irish Prison Service and Probation Service Strategic plan 2015-2017 contain actions to respond to the particular needs of Travellers in prison³². However, the State hasn't introduced any measures to address the over-representation of Traveller women in prison or the contributing factors that increase their risk of imprisonment despite a call from the CEDAW Committee to do so along with addressing the standard of conditions in prisons.³³ Overcrowding is an ongoing serious issue across the prison estate with both women's prisons consistently showing the highest rates of overcrowding.³⁴

Recommendations:

- Identify and address the contributing factors to the overrepresentation of Traveller women in prison.
- Introduce alternative community-based responses for Traveller and Roma women who have committed non-violent poverty related offences or who experience mental health/additional issues.
- Continued development and support of special measures for early intervention, pre and post-prison release supports for Traveller and Roma women.

²⁷ The Traveller Accommodation Programme budget was €70 million in 2008 before recession cuts and reached a low of €4 million in 2015. €23 million has been allocated for 2025.

²⁸ Irish Prison Service cited in Travellers in Prison Initiative, http://ssgt.ie/travellers_in_prison.html.

²⁹ Kelleher et al., 2010 (3).

³⁰ Irish Independent, 'Women's prisons over capacity as inmates committed for minor offences, warns Irish Penal Reform Trust', 21 November 2013, <http://www.independent.ie/irish-news/womens-prisons-over-capacity-as-inmates-committed-for-minor-offenceswarns-iris-h-penal-reform-trust-29773032.html>.

³¹ Travellers in Prison Initiative. 'Hearing their Voices' Traveller Women in Prison. 2017 <https://www.ssgt.ie/wp-content/uploads/2017/11/Hearing-their-Voices-Traveller-Women-in-Prison.pdf>.

³² Irish Prison Service and The Probation Service, *Joint Irish Prison Service & Probation Service Strategic Plan 2015-2017*, http://www.irishprisons.ie/images/pdf/jointstrat_english.pdf.

³³ Recommendation 52(b) in CEDAW, 2017.

³⁴ On the 14th of October 2024 the number of women in custody in the Dóchas was 180 - 123% capacity and Limerick women's prison had 81 women in custody – 145% capacity. https://www.irishprisons.ie/wp-content/uploads/documents_pdf/14-October-2024.pdf

- Introduce Trauma based care and responses that take account of Traveller and Roma women’s intergenerational disadvantage and systemic inequality.

9. Health

Traveller Women’s Health

There are poor health outcomes for Traveller women due to structural inequalities and failure to address the social determinants of health, including racism, discrimination, poor accommodation conditions, poverty, low literacy levels and discrimination. The mortality rate for Traveller women is three times the rate of the general population, and suicide for Traveller women is 5 times higher than the general population. Traveller women’s perinatal outcomes remain exceptionally poor, with disproportionate rates of maternal mortality, morbidity and perinatal death. We are concerned that Traveller health inequalities have widened, particularly as the general population’s health has improved.

Roma Women’s Health

Roma women experience significant barriers to accessing primary care due to lack of sufficient income, high cost of health care and lack of interpretation and translation services. Many Roma women, who do not have an income or have difficulties with proving where they live, cannot access means tested Medical Cards. In a quarter of Roma households’ women have not accessed a doctor or hospital during pregnancy.

Recommendations:

- Fully implement and resource the National Traveller Health Action Plan, including increased core funding for independent peer-led Traveller Primary Health Care Projects.
- Continue supporting and further developing both mainstream and special measures to address Roma health inequalities.
- Accelerate actions to promote Traveller and Roma women’s health in the Women’s Health Action Plan and the National Maternity Strategy.

10. Participation in Political & Public Life

Traveller and Roma women experience significant exclusion from decision making and wider political processes due to discrimination and marginalisation. We acknowledge the important development in this area in 2020 with the appointment of a Traveller woman to the Seanad.³⁵ However, beyond this, the State has not adopted measures to improve the representation of Traveller or Roma women in political institutions and decision making at local or National level despite calls from human rights monitoring bodies.³⁶

The Electoral (Amendment) (Political Funding) Act 2012 saw the introduction of gender quotas for political parties of at least 30% women candidates and 30% men candidates to contest general elections being introduced for national politics. The quota rose to 40% in 2023. While this is welcomed, the national gender quota has not improved the participation of minoritised women (including Traveller and Roma women) as either candidates or elected politicians.

³⁵At local level, there are currently no Traveller or Roma councillors. At national level, Ireland has never directly elected a Traveller or Roma woman to either House of the Oireachtas.

³⁶FCNM, *Opinion on Ireland*, ACFC/INF/OP/I(2004)003, 5 May 2004; FCNM, *Second Opinion on Ireland*, ACFC/OP/II(2006)007, 30 October 2006; FCNM, *Third Opinion on Ireland*, ACFC/OP/III(2012)006, 19 April 2013; FCNM, 2019; CERD, *Concluding Observations of the Committee on the Elimination of Racial Discrimination: Ireland*, CERD/C/IRL/CO/2, 2005; CERD, 2011; CERD, 2019; CEDAW, 2017; Council of Europe, *Report by the Commissioner for Human Rights Mr. Thomas Hammarberg on His Visit to Ireland*, Strasbourg, 2008.

We suggest that the State could investigate the feasibility of incorporating a nested ethnic quota into existing gender quotas for political candidates at national level to increase the political participation of Traveller and Roma women, and women from other ethnic minority backgrounds. There are many other measures the State could investigate to increase the political participation of Traveller and Roma women³⁷. The State should consult representative organisations of Traveller and Roma women in the design and implementation of any positive actions or diversity mechanisms intended to increase Traveller and Roma women’s political participation.

Recommendations:

- Undertake legislative and practical measures to ensure the inclusion of Travellers, including Traveller women, in political representation at local and national levels.
- Undertake special measures to promote the inclusion of Traveller and Roma women and their issues in participative democracy, policies, programmes, and initiatives undertaken at local and national level.
- Implement the recommendations of the ‘Different Paths, Shared Experiences: Ethnic Minority Women and Local Politics in Ireland’ report³⁸.

11. Violence against Traveller and Roma women

Traveller and Roma women experience significant barriers to exiting violence and seeking safety and protection from domestic, sexual and gender-based violence (DSGBV). There is a lack of comprehensive and reliable data on DSGBV impacting Traveller and Roma women, and research around this has been very small and is outdated. Roma and Traveller women who are unable to satisfy their right of residence and the habitual residence condition (HRC) are unable to exit violence and access essential emergency and long-term supports, including public housing, housing benefits or basic income supports. Refuges are not always able to accommodate women who are not deemed ordinarily resident in the State³⁹. Several international human rights bodies have raised concerns about the discriminatory effect of the HRC on Roma, Traveller and victims of domestic violence⁴⁰.

Recommendations:

- Ensure the Third National Strategy on Domestic, Sexual and Gender-based Violence has a robust implementation, monitoring and evaluation plan with clear targets, indicators, outcomes, timeframes and budget lines associated with actions related to Traveller and Roma women and ensure actions are resourced and implemented by all relevant statutory agencies.
- Ensure a humanitarian response to women who are unable to satisfy or prove their right to reside in the jurisdiction by introducing an exemption to the Habitual Residence Condition and the Housing Act 1988 for women who are subjected to domestic and sexual violence.

³⁷ Measures could include: When reform of the Seanad is underway, the creation of a panel for minoritised communities (including Travellers and Roma) with gender parity; the provision of funding to political parties to diversify their membership and candidate lists which can either be spent in the allocated year or forfeited; and the establishment of a comprehensive voter registration and awareness campaign directed specifically at Traveller and Roma women and girls. Reserved seats at national and local levels and the creation of a nationwide special electoral district for national representation, and county-wide special electoral districts for local representation, for Traveller and Roma people (with gender parity) might also be investigated.

³⁸ Different Paths, Shared Experiences: Ethnic Minority Women and Local Politics in Ireland, 2022
https://www.ntwf.net/wp-content/uploads/2022/03/15754_NTWF_Report_V8.pdf

³⁹ Women’s Aid, *Women’s Aid input into FLAC Shadow Report under the International Covenant on Economic, Social and Cultural Rights*, 2014,
https://www.womensaid.ie/download/pdf/womens_aid_input_to_flac_icescr_shadow_report_may_2014.pdf

⁴⁰ UNGA, 2012(63); European Commission against Racism & Intolerance, 2013 (63); CRC, 2015; HRC, 2014; CESCR, 2015.