



Convention on the Elimination of All Forms of Discrimination Against Women

Joint Alternative Report by a Coalition of Traveller and Roma Organisations

May 2025

Our Coalition

This report is submitted as a coalition of nine 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, **Wicklow Travellers' Group**, established in 2001, is a voluntary community development organisation committed to achieving human rights for Travellers in County Wicklow. **Tipperary Rural Traveller Project (TRTP)** formed in 2003 works with the Traveller community in Tipperary to address key issues such as health and accommodation and to promote and protect Traveller culture.

Irish Travellers and Roma women 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 Roma¹. 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 women and girls are among the most marginalised and excluded individuals and groups in Ireland.

About this Submission

This submission identifies priority issues affecting Traveller and Roma women and girls in Ireland, in response to the Irish State Report to the United Nations Committee on the Elimination of Discrimination against Women and is structured thematically, referencing specific Convention Articles and recommendations. Since the last examination of the State Party in 2017, we have seen significant milestones being met for Traveller and Roma women, namely, the Irish State's recognition of Traveller ethnicity, in addition to a number of important targeted and mainstream policy developments which seek to address Traveller and Roma inclusion. However, much remains to be achieved in terms of full

¹ According 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/>

and effective implementation of key policies and measures which have positive impacts and outcomes for Traveller and Roma women and girls.

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Executive Summary and Key Recommendations

As minority ethnic women, Traveller and Roma women face additional marginalisation in comparison to Traveller and Roma men, as well as 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 targeted and mainstream, to ensure equality of access, participation and outcomes across all policy areas.

This Coalition Report to the UN CEDAW Committee puts forward the following overarching recommendations across the relevant Articles and General Recommendations of the CEDAW Convention to progress the civil, political, economic, social and cultural rights of Traveller and Roma women in Ireland:

- Introduce gender specific objectives, targets, activities, indicators, timeframes and adequate human and financial resources for the **social inclusion of Traveller and Roma women in all policy areas**, including education, training, employment, health, accommodation, violence against women and local and community development initiatives
- Ensure the **full implementation of the National Traveller and Roma Inclusion Strategy (NTRIS II)**, as well as other targeted policies such as the **National Traveller and Roma Education Strategy (TRES)** and the **National Traveller Health Action Plan (NTHAP)** with robust implementation and monitoring processes, with actions being adequately resourced and implemented by all relevant statutory agencies.
- Publish the **National Equality Data Strategy** without further delay ensuring clear timelines, resources and accountable parties to ensure implementation. Ensure data collection and analysis is disaggregated by ethnicity and gender across all administrative systems and mainstream services and is in line with human rights-based standards of data collection.

We make further recommendations in other key policy areas in the main body of the report, and we respectfully ask for the Committee to call upon the State to take action in all these priority areas to ensure the rights of Traveller and Roma women are promoted, protected and realised.

- Ensure that the **National Action Plan Against Racism (NAPAR)** is afforded ring-fenced multi-annual funding to support implementation and delivery of the Plan; with a strong monitoring framework, 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.
- Include Traveller and Roma-specific objectives, actions, targets and dedicated resources within the new **National Strategy for Women and Girls**. This includes allocating sufficient human and financial resources for targeted social inclusion programmes, and for Traveller and Roma organisations.

- Undertake special measures to promote the inclusion of Traveller and Roma women and their issues in **political representation, participative democracy**, policies, programmes, and initiatives undertaken at local and national level.
- Develop and resource a comprehensive **Traveller and Roma Training, Employment, and Enterprise Strategy** with targeted measures for women, ensuring access to affordable childcare, benefit retention during training, extended medical card access during employment, and increased engagement in mainstream opportunities.

Discrimination against Traveller & Roma women – Article 2 & General Recommendation 28

Traveller and Roma women experience high levels of discrimination and racism at individual and institutional levels. Roma women are highly vulnerable to racism,² particularly within the current context of the rise in far-right rhetoric and targeted hate towards minority ethnic groups³, including Roma. In 2020, the EU Fundamental Rights Agency (FRA) found that among all surveyed, Irish Travellers (52%) have the third highest rate of hate-motivated harassment such as offensive comments on the street or online.⁴ We welcome the enactment of the Criminal Justice (Hate Offences) Act 2024⁵ while noting with concern the removal of specific provisions addressing hate speech⁶, which leaves Travellers and Roma without this crucial additional layer of protection against targeted abuse and incitement.

We also welcome the publication of the National Action Plan against Racism (NAPAR) last year, and its inclusion of Travellers and Roma and the acknowledgement of the intersectionality between racism and multiple forms of oppression including gender.⁷ However, it is regrettable that the persistent racism faced by Traveller and Roma women is not reflected in the Irish State report to CEDAW, which is particularly concerning in light of the rise in far-right sentiment and events such as the Dublin riots.

Recommendations:

- Ensure that NAPAR is afforded ring-fenced multi-annual funding to support implementation and delivery of the Plan; with a strong monitoring framework, 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.
- Roll out special measures to ensure that the Criminal Justice (Hate Offences) Act 2024 effectively addresses hate crime and Travellers and Roma feel included and protected by the law. Measures include enhanced criminal justice training, improved reporting and data collection, strengthened victim supports, and public awareness initiatives.
- Review and amend the current Incitement to Hatred Act 1989⁸ in order to fully protect victims of hate speech in Ireland, including Traveller and Roma women.

Disaggregated Data by Ethnicity & Gender - General Recommendation 9

² Roma in Ireland: National Needs Assessment found that some Roma women are more easily identifiable through traditional dress associated with Roma and this makes them more vulnerable to on street harassment

³ Many Roma living in Dublin's inner city felt targeted following the Dublin riots in 2023. The rise of the far right in Ireland is documented in recent research such as Fattibene et al (2024) The Far-Right Ecosystem in Ireland: History and Contemporary Trends.

<https://www.jstor.org/stable/27349912?seq=1>

⁴ 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.

⁵ Criminal Justice (Hate Offences) Act 2024 was formally commenced by the Minister and came into operation on 31st December. <https://www.gov.ie/en/press-release/bcddb-new-hate-crime-legislation-comes-into-force/>

⁶ The European Commission have stated in their most recent monthly infringement package that they believe Ireland is failing to comply with laws around race-based violence and hate and Ireland has 2 months to begin implementing hate speech laws or face being taken to the Court of Justice of the EU.

⁷ National Action Plan Against Racism, 2023 <https://www.gov.ie/en/publication/14d79-national-action-plan-against-racism/>

⁸ As recently highlighted in the European Commission's monthly infringement package, which details what countries it believes are failing to comply with European law

Lack of disaggregated data by ethnicity and gender results in failure to provide an ongoing evidence base of the situation of minority ethnic women, including 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 in Ireland's previous review and by various human rights bodies, including UN CERD, CRC and CESCR.⁹ This was also highlighted in the review of the National Strategy for Women and Girls,¹⁰ 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.¹¹ While progress has been made with some Government Departments and State Agencies¹² in relation to progressing ethnic data collection, there has been resistance and regression with others.¹³ For example, the Department of Housing continues to use a Traveller-only question within its data collection system which is contrary to core Articles contained within the Convention along other UN treaty monitoring treaties. This approach also only serves to make Travellers feel further isolated and explicitly targeted.

In 2024, the State established a working group to oversee the development of a National Equality Data Strategy to improve Ireland's collection of equality data. This work was completed in 2024, with a view to getting government approval to publish. However, this has not happened. As a result, there are existing gaps in statistical data on the situation of Travellers, Roma and other minority ethnic women, making such groups who are most marginalised, invisible and immune from targeted policies for social inclusion.

Recommendations:

- Publish the National Equality Data Strategy without further delay ensuring clear timelines, resources and accountable parties to ensure implementation.
- Collect, analyse and publish disaggregated data by ethnicity and gender across all administrative systems and statutory services in line with human rights standards.

National Women's Strategy – General Recommendation 6 & 25

In late 2024, a consultation process to inform the next National Strategy for Women and Girls began. At the time of submission, this has not been completed but we understand that it is the Department's intention to publish the strategy before Ireland's review under CEDAW. The National Strategy for Women and Girls (NSWG) 2017 – 2021 contained actions related to Traveller and Roma women, however, a number of actions relied solely on the implementation of gender actions in the previous National Traveller and Roma Inclusion Strategy (NTRIS). As the previous NTRIS did not have an implementation plan, actions related to Traveller and Roma women were not progressed. In 2019, the Advisory Committee on the Framework Convention on National Minorities¹⁴ urged the State to

⁹ 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.

¹⁰ 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.

¹¹ Irish Human Rights and Equality Commission Act 2014, Section 42.

¹² 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.

¹³ 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.

¹⁴ 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.

implement the NTRIS and NSWG in a coordinated and consistent way, however this did not occur. Targeted objectives, actions and allocated resources to address the exclusion and marginalisation of Traveller, Roma and other minority women must be embedded within the next iteration of the Strategy.

Recommendations:

- Include Traveller and Roma-specific objectives, actions, targets and dedicated resources within the National Strategy for Women and Girls and ensure this is developed in coordination with the gender actions of NTRIS. This includes allocating sufficient human and financial resources for targeted social inclusion programmes, and for Traveller and Roma organisations.
- Engage in active and meaningful consultation with Traveller organisations and groups working with Roma throughout the entire lifecycle of the NSWG (development, implementation, monitoring, and evaluation). Incorporate advisory and appropriate decision-making powers within the consultative and monitoring structures, ensuring Traveller and Roma women's representation on oversight bodies.
- Equality-proof budgetary decisions systematically and transparently in partnership with Traveller organisations and groups working with Roma.

National Traveller Roma Inclusion Strategy – General Recommendation 5&25

The new National Traveller and Roma Inclusion Strategy (2024-2028) was published last year, with an enhanced focus on outcomes for Travellers and Roma across a broad range of areas, including addressing racism, education, employment, gender inequality, and accommodation. However, there has been a six-month delay in the inaugural meeting of its implementation structure and this raises concerns. The previous strategy experienced significant implementation delays and was hampered by the absence of defined targets, measurable indicators, clear outcomes, specific timeframes, and allocated budgets.

Recommendation:

- Ensure the full implementation of NTRIS II, including actions addressing the inequalities faced by Traveller and Roma women, with robust implementation and monitoring processes and actions fully resourced and implemented by all relevant statutory agencies.

Participation in Political & Public Life – Article 7 & General Recommendation 23

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 and her election in 2024.¹⁵ 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.¹⁶

The Electoral (Amendment) (Political Funding) Act 2012 saw the introduction of national gender quotas for political parties of at least 30% women candidates and 30% men candidates to contest general elections. 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.

¹⁵At local level, there are currently no Traveller or Roma councillors. At national level, Ireland had never directly elected a Traveller or Roma woman to either House of the Oireachtas until the 2025 Seanad election when Senator Eileen Flynn was elected for the Administrative Panel in 2025, having previously being nominated by the Taoiseach in 2020.

¹⁶FCNM, *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 women¹⁷. 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 special measures to promote the inclusion of Traveller and Roma women and their issues in political representation, 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' report¹⁸.

Education – Article 10

Traveller and Roma women experience significant educational disadvantage stemming from systemic racism and socio-economic barriers. This results in lower rates of participation, progression, and attainment compared to the general population¹⁹. We welcome the recent development and launch of the first National Traveller and Roma Education Strategy along with the first of three implementation plans²⁰ which looks at the inclusion of Travellers and Roma across all educational levels. Other positive developments include the use of targets for Travellers and Roma within the National Access Plan for Equity of Access in Higher Education²¹. The robust implementation of both strategies with accurate data to support monitoring, setting post-primary targets, and allocating resources will be required to address the educational disadvantage of Traveller and Roma women and girls.

In terms of early years education, we welcome the Early Start²² programme launched last year which has a focus on Travellers and Roma and seeks to employ staff to secure outcomes for both communities. However, Ireland's childcare and early years education system is in crisis, with high costs, lack of places, and high staff turnover, which has a particular impact on access for marginalised groups including Travellers and Roma.

Recommendations:

- Implement and fully resource the National Traveller and Roma Education Strategy to address the educational disadvantage experienced by Traveller and Roma women and girls at all educational levels.

¹⁷ 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.

¹⁸ Cullen, P., & Gough, S., (2022), *Different Paths, Shared Experiences: Ethnic Minority Women & Local Politics in Ireland*. National Traveller Women's Forum (NTWF) and AkiDwA https://www.ntwf.net/wp-content/uploads/2022/03/15754_NTWF_Report_V8.pdf.

¹⁹ For more details, Pavee Point (2024) Travellers and Roma in Education and Training Overview of Provision and Engagement <https://www.paveepoint.ie/wp-content/uploads/2024/03/Pavee-Pt.-Travellers-Roma-Education-Training-MK-FINAL-Wed-6-March-2024-1-1-3.pdf>

²⁰ Traveller and Roma Education Strategy, 2024, <https://www.gov.ie/en/consultation/2545f-traveller-and-roma-education-strategy/>.

²¹ 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.>

²² The Early Start Programme is a pre-school project which targets some areas of urban disadvantage.

<https://www.gov.ie/en/departments-of-education/services/early-start-pre-school-programme/>

- Ensure ongoing and comprehensive inclusion of Traveller and Roma children in the implementation of the Early Start programme and establish a publicly funded early years education and care sector, similar to our primary school system, in order to meet the rights and needs of children, families and women, including Travellers and Roma.

Employment – Article 11 & General Recommendation No. 26

Traveller and Roma women experience high levels of unemployment due to racism, discrimination, low educational attainment, childcare and family commitments, and can remain in a poverty trap. 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 seeking employment, and 55% of Travellers have experienced discrimination at work.²³ The high cost of childcare acts as a major barrier for Traveller and Roma women to access employment, further education and training²⁴. Many women also fear losing secondary benefits, particularly the Medical Card²⁵.

We acknowledge the State's commitment to develop a Traveller and Roma Training, Employment and Enterprise Plan and the targeted employment supports for minority ethnic groups in the State's Pathways to Work Strategy²⁶. 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:

- Develop and resource a comprehensive Traveller and Roma Training, Employment, and Enterprise Plan with targeted measures for women, ensuring access to affordable childcare, benefit retention during training, extended medical card access during employment, and increased engagement in mainstream opportunities.
- Continue to support paid internships for Traveller and Roma women in Government Departments, Local Authorities and other public bodies²⁷, ensuring clear pathways to long term employment opportunities in the public sector.

Traveller & Roma Women's Health–Article 12 & General Recommendation 24

There are poor health outcomes for Traveller and Roma 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.²⁸ Traveller women have higher rates of self-harm and suicide-related ideation, compared to non-Traveller women (3.04 higher rates for suicide-related ideation and 3.85 higher rates for self-harm).²⁹ Traveller women's perinatal outcomes remain

²³ 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.

²⁴ 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.

²⁵ 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).

²⁶ Gov of Ireland (2021) Pathways to Work (<https://www.gov.ie/en/department-of-social-protection/publications/pathways-to-work-strategy-2021-2025/>)

²⁷ The Traveller and Roma Internship was launched in 2022 and involved interns being placed in the Public Appointments Service, Department of Justice, Department of Agriculture, Food and the Marine, and the Houses of the Oireachtas. This programme is being expanded in 2025

²⁸ Kelleher et al., All Ireland Traveller Health Study, University College Dublin & Department of Health & Children, 2010.

²⁹ Kavalidou, Katerina and Daly, Caroline and McTernan, Niall and Corcoran, Paul (2023) Presentations of self-harm and suicide-related ideation among the Irish Traveller indigenous population to hospital emergency departments: evidence from the National Clinical Programme for self-harm. *Social Psychiatry and Psychiatric Epidemiology*, 58, pp. 883-891. <https://doi.org/10.1007/s00127-023-02439-7>.

exceptionally poor, with disproportionate rates of maternal mortality, morbidity and perinatal death. Traveller babies are three times more likely to die in their first year than infants in the general population, even though 98% of Traveller women avail of maternity services. We are concerned that Traveller health inequalities have widened, particularly as the general population's health has improved.

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. Roma women face additional barriers in accessing maternal health services in Ireland. The National Roma Needs Assessment found that almost a quarter of Roma women in Ireland did not attend a doctor or hospital while pregnant and first accessed a hospital to give birth.³⁰ This is largely due to a lack of access to primary health care and accessible maternal health information.³¹ It was also reported that almost 40% of Roma women could not afford basic supplies, such as baby clothes or nappies when attending the hospital to give birth.³²

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. The State has committed to the development of a Roma Health Action Plan which is to be welcomed and must be developed in partnership with groups working with Roma.

Recommendations:

- Fully implement and resource the National Traveller Health Action Plan (NTHAP), including increased core funding to support, strengthen and sustain independent peer-led Traveller Primary Health Care Projects.
- Develop a comprehensive Roma Health Action Plan underpinned by a Right to Health and social determinants of health approach, as committed to in the National Traveller and Roma Inclusion Strategy II.
- Resource and implement actions to promote Traveller and Roma women's health in the Women's Health Action Plan and address the inequalities and barriers that exist for Traveller and Roma women in relation to maternal health in the National Maternity Strategy.
- Increase and ringfence dedicated funding for the mental health actions within NTHAP and NTRIS II, ensuring full implementation at both the national and local level.

Economic and Social Benefits – Article 13

Many Roma women in Ireland are unable to access basic social protections due to the implementation of right to reside, European Directive 2004/38, and habitual residence condition (HRC), policy by the Department of Social Protection.³³ 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 (a universal

³⁰ Curran et al., *National Roma Needs Assessment*, 2018.

³¹ Pavee Point (2023) *Le Romneango Sfato Roma Women's Voices: Experiences of Maternal Health Services in Ireland*.

³² *Ibid.*

³³ 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)

payment for all children in the State), Job Seekers Allowance, Rent Allowance, public housing, and employment and training supports.³⁴ Roma women face significant difficulties with meeting HRC requirements due to with lack of documentation, proof of address and language and literacy barriers. Concerns about the discriminatory effect of the HRC on Travellers, Roma and victims of domestic violence, as well as Roma children, have been raised by the Special Rapporteur on extreme poverty and human rights, European Commission against Racism and Intolerance, UNCRC, HRC, and CESCR.³⁵

Recommendations:

- Review the application of the right to reside and habitual residence condition in consultation with Traveller and Roma 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 condition³⁶
- Set targets for reducing Traveller and Roma women and girls' poverty in key mainstream policy initiatives related to poverty, social inclusion and employment including the Child Guarantee and Roadmap to Social Inclusion.

Violence against Women – General Recommendation No. 12 & 19

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, with minimal and outdated research in the area. 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 supports, including public housing, housing benefits or basic income supports. Several international human rights bodies have raised concerns about the discriminatory effect of the HRC on Roma, Traveller and victims of domestic violence³⁷.

Recommendations:

- Ensure Traveller and Roma women are actively consulted and included in the implementation of the Third National Strategy on Domestic, Sexual and Gender-based Violence and the associated work of CUAN (the National DSGBV agency), 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.
- Undertake research to map out the needs and issues of Traveller, Roma and minority ethnic women as they relate to the experiences of DSGBV, including through the CSO national domestic violence study, in consultation with Traveller organisations and groups working with Roma.
- Consult and include Traveller organisations and groups working with Roma on the development of new Refuge accommodation to ensure Traveller and Roma access and inclusion.³⁸
- 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.

Disadvantaged Groups & Further Areas of Concern: Accommodation

³⁴ 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>.

³⁵ 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.

³⁶ 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).

³⁷ UNGA, 2012(63); European Commission against Racism & Intolerance, 2013 (63); CRC, 2015; HRC, 2014; CESCR, 2015.

³⁸ The Third National Strategy on Domestic, Sexual and Gender-based Violence 2022-2026, "Zero Tolerance," has a key action to double the number of refuge spaces in Ireland from 140 to 280 by the end of 2026. The target of 280 spaces by 2026 still falls short of the Council of Europe's Istanbul Convention guidelines.

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

The appropriate type and standard of Traveller accommodation impacts greatly on life expectancy and on all other aspects of Traveller women's lives.³⁹ Research shows that 39% of Travellers meet the European definition of homelessness⁴⁰ 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 homeless⁴¹ population. This includes Traveller women who have experienced or are experiencing domestic violence.⁴² 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. 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.

Over 90% of Roma in Ireland report experiencing discrimination when accessing accommodation. Almost half of Roma in Ireland have experienced homelessness in their lives, and due to the restrictive criteria of accessing emergency accommodation and social housing supports, most live in poor private rental accommodation and overcrowded conditions. Of significant concern are new proposed amendments relating to homelessness in the Housing Act 1988, which seek to introduce further restrictions to eligibility criteria for accessing emergency accommodation. The habitual residence condition as an eligibility requirement for accessing social protection (a condition not present in Irish legislation) already causes a disproportionate discriminatory impact on marginalised groups in Ireland. The enshrinement of these eligibility requirements in housing law will undermine the State's efforts to meet its international human rights obligations which it has committed to in NTRIS II.

Recommendations:

- Name Travellers and Roma as a priority group in the next National Housing Strategy, ensuring their accommodation needs are met through targeted actions, measurable targets, dedicated resources, and a specific focus on the experiences of women, particularly those affected by domestic violence and substance misuse.
- Ensure the full resourcing and effective implementation of accommodation actions outlined in the National Traveller and Roma Inclusion Strategy, the Expert Group on Traveller Accommodation reports, and Local Authority Traveller Accommodation Plans (TAPs).
- Undertake a broad consultation on proposed amendments to the Housing legislation, specifically analysing and addressing potential discriminatory impacts on marginalized groups. This consultation should also consider the repeal of Section 24 of the Housing Miscellaneous Act 2002 due to its discriminatory effects on Travellers and their nomadic culture.
- Mandate Local Authorities to review all housing and homeless support processes through a robust equality lens, in line with the Public Sector Equality and Human Rights Duty, to address the

³⁹ 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.

⁴⁰ (European Typology of Homelessness and Housing Exclusion - ETHOS)

⁴¹ Harvey, B. (2021) Pavee Point Commissioned Research: The Traveller Community and Homelessness. Dublin: Pavee Point Traveller and Roma Centre.

⁴² 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.

disproportionate impact of the housing crisis on ethnic minority groups, including Traveller and Roma women.

- Allocate a proportionate share of the Traveller accommodation budget to the development of new Traveller-specific accommodation and establish a strong monitoring and evaluation framework to guarantee the full and effective expenditure of funds allocated to Local Authorities for this purpose.

Disadvantaged Groups & Further Areas of Concern: Accommodation – Detention

Although Travellers account for 0.6% of the overall population in Ireland, they account for 22% of the female prison population⁴³. The risk for a Traveller woman being imprisoned is 18 to 22 times higher than that of the general population⁴⁴. The majority of Traveller women in detention are sent to prison for non-violent, poverty related offences⁴⁵. They have a background of social and educational disadvantage, unemployment, homelessness, literacy difficulties, 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.⁴⁶

The Irish Prison Service has engaged with the work of the Traveller Justice initiative and supports peer support work with Travellers in prison. The Probation Service statement of Strategy 2024-2026 acknowledges the recommendations of the 'Irish Travellers' Access to Justice Report 2022. However, the State hasn't introduced 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.⁴⁷ Overcrowding is an ongoing serious issue across the prison services with both women's prisons consistently showing the highest rates of overcrowding.⁴⁸

Recommendations:

- Identify and address the contributing factors to the overrepresentation of Traveller women in prison and expand community-based alternatives for short sentences and non-violent offences, particularly for primary caregivers.
- Enhance early intervention, pre- and post-release supports for Traveller and Roma women, utilising trauma-informed care that acknowledges intergenerational disadvantage and systemic inequality.

⁴³ Irish Prison Service cited in Travellers in Prison Initiative, http://ssgt.ie/travellers_in_prison.html.

⁴⁴ Kelleher et al., 2010 (3).

⁴⁵ 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-irish-penal-reform-trust-29773032.html>.

⁴⁶ 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>.

⁴⁷ Recommendation 52(b) in CEDAW, 2017.

⁴⁸ On the 8th of May 2025 the number of women in custody in the Dóchas was 194 - 133% capacity and Limerick women's prison had 83 women in custody – 148% capacity. https://www.irishprisons.ie/wp-content/uploads/documents_pdf/08-May-2025.pdf