



**Joint Submission to the
Department of Housing, Local Government and Heritage**

**Child and Family Homelessness Action Plan Public Consultation
February 2026**

Pavee Point Traveller and Roma Centre and National Traveller Women's Forum

Pavee Point has been working to challenge racism and promote Traveller and Roma inclusion in Ireland since 1985. The organisation works from a community development perspective and promotes the realisation of human rights and equality for Travellers and Roma in Ireland. The partnership organisation works to address the needs of Travellers and Roma as minority ethnic groups experiencing exclusion, marginalisation and racism. The central aim of Pavee Point is to contribute to the improvement in the quality of life and living circumstances of Irish Travellers and Roma.

The National Traveller Women's Forum (the 'NTWF') is the national network of Traveller women and Traveller women's organisations from across Ireland. Traveller women are one of the most marginalised groups in Irish society. Their experience of inequality and discrimination differs from that of the majority population and other minority groups, and their experience of racism and discrimination is different to those of Traveller men. We recognise the particular oppression of Traveller women in Irish society and are working to address this issue through the provision of opportunities for Traveller women to meet, share experiences and ideas, and develop collective strategies and skills to work towards the enhancement of their position in society.

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Introduction

Pavee Point and the National Traveller Women's Forum welcome the opportunity to contribute to the consultation on Child and Family Homelessness Action Plan. As national Traveller organisations advancing the human rights, equality and social justice of Travellers and Roma, we bring extensive knowledge and experience of the disproportionate impact of homelessness and housing insecurity on Traveller and Roma children and families. Our submission draws on our policy, research and advocacy work to set out priority areas and measures needed within the Action Plan to deliver meaningful and lasting change for Traveller and Roma children and families.

Current Situation

There are a number of pathways, factors and reasons for the disproportionate number of Travellers and Roma experiencing inequality in access to accommodation, homelessness, overcrowding and unsafe living conditions. Research to date and work by our organisations highlight the impacts of racism and discrimination, unemployment and poverty, evictions, and lack of accommodation for larger family sizes as some of the reasons. Access to culturally appropriate accommodation for Travellers, and to adequate housing supports and other social protection measures for Roma children and families, remain unresolved. Traveller and Roma women experience a disproportionate burden of poverty, caregiving responsibilities and gender-based discrimination, placing them at heightened risk of homelessness and reducing their ability to access supports out of homelessness. These challenges are intensified by the worsening housing and homelessness crisis, despite existing policy commitments.

The recently published 2024 survey findings by the EU Fundamental Rights Agency (FRA)¹ provide stark findings on Traveller child poverty, material and housing deprivation, overcrowding and discrimination, which all act as key drivers of child and family homelessness. The findings show that:

- 97% of Traveller children in Ireland are at risk of poverty, compared with 15% of children in the general Irish population
- 96% of Travellers are at risk of poverty compared 12% of the general Irish population
- 40% of Travellers live in severe material deprivation — far higher than the 4% of the general population and an increase from 31% from the 2019 FRA survey
- 42% of Travellers live in housing deprivation (up from 39% in 2019)
- 63% of Travellers live in overcrowded housing, an increase from 46% from the 2019 FRA survey
- 74% of Travellers in Ireland felt discriminated against when looking for housing
- 95% of Roma are at risk of poverty. This compares to 12% of the general Irish population
- 96% of Roma children are at risk of poverty. This compares to 15% of Irish children in general
- 41% of Roma live in severe material deprivation. This compares to 4% of the general Irish population

Other evidence shows that Travellers are ten times as likely to report discrimination in access to housing as the general population, even after education and employment status are held constant.² The overwhelming majority of landlords (82%) would not rent to Travellers,³ only 53% of people report being "very comfortable" living next to a Traveller or Roma.⁴ In 2019 the Fundamental Rights

¹ European Fundamental Rights Agency and Pavee Point Traveller and Roma Centre (2025) *Summary and Perspectives on the Irish Findings from the Rights of Roma and Travellers in 13 European Countries*. Dublin: Pavee Point Publications.

² Grotti, R., Russell, H., Fahey, É. and Maître, B. (2018) *Discrimination and Inequality in Housing in Ireland*. Dublin: Irish Human Rights and Equality Commission by the Economic and Social Research Institute.

³ Housing Agency (2017) [Research Report Experiences of Travellers in the Private Rented Sector](#).

⁴ Carron-Kee, E., McGinnity, F., Almir, A. (2024) [Understanding Attitudes to Travellers and Roma in Ireland](#), Department of Children, Equality, Disability, Integration and Youth.

Agency found that Irish Travellers had one of the highest rates of reported discrimination (73%) when trying to rent or buy housing over the previous 5 years.⁵

The Department's own figures show that there are approximately 12,360 Traveller families living across the country with 68% accessing accommodation through local authorities, 12% in private rented accommodation and 7% owning their accommodation, and 12.5% of Travellers as homeless either living on the side of the road or doubling/trebling up on already overcrowded sites.⁶ However, this figure is a conservative estimate with research showing that 39% of Travellers meet the European definition of homelessness (European Typology of Homelessness and housing exclusion-ETHOS),⁷ which includes those in emergency accommodation and the large number of Travellers who experience 'hidden homelessness' in overcrowded living conditions. This is compared to 6% of the general population.

Most Roma live in private rented accommodation, while 13% live in social housing. Roma face discrimination in accessing accommodation, severe overcrowding, poor living conditions, a lack of security of tenure, homelessness, and barriers accessing social housing and housing assistance payments. Research shows that:

- 46% of Roma in Ireland reported experiencing homelessness at some stage in their lives⁸. It is understood that this figure would be significantly higher if those living in hidden homeless situations (e.g.) with family and friends in overcrowded conditions were also included
- 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.

For Roma, applying for social housing or registering as homeless can be a lengthy and difficult process, with digital divide and lack of interpretation/language supports forming significant barriers.

1. Prioritising Traveller and Roma Children and Families in Housing and Homelessness Policy

The 2021 *Housing for All* Strategy acknowledged the overrepresentation of Travellers and Roma in the homeless population and committed to providing more Traveller specific accommodation. These commitments have not led to tangible improvements⁹ for Traveller and Roma children and families. To deliver on the commitments of *Delivering Homes, Building Communities*, the Child and Family Homelessness Action Plan must explicitly prioritise Traveller and Roma children and families through targeted measures and clear accountability. As one of the groups most severely affected by homelessness and housing exclusion, failure to do so risks leaving those in greatest need outside the reach of the Plan.

⁵ EU Fundamental Rights Agency (FRA) (2020) Travellers in Ireland - Key results from the Roma and Travellers survey 2019

⁶ Department of Housing, Local Government, Heritage (2023) Traveller Accommodation Statistics <https://assets.gov.ie/static/documents/2023-annual-estimate-of-accommodation-of-travellers-in-all-categories-of-accommodation.pdf>.

⁷ Pavee Point Traveller and Roma Centre (2021) The Traveller Community and Homelessness <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf>

⁸ Pavee Point and Dept Justice (2018) Roma in Ireland. A national needs assessment

⁹ Only 772 Traveller-specific accommodation outputs were delivered during the 2019–2024 Traveller Accommodation Programme, despite councils initially setting a target of 3,060 units, highlighting a substantial shortfall in delivery. These outputs consisted of 120 group housing units (including 74 new builds), 82 halting site bays (with 22 new bays), 160 caravans provided through the Caravan Loan Scheme, and 105 acquired homes. <https://itmtrav.ie/key-reports/>

- Explicitly name Travellers and Roma as priority groups within the Action Plan
- Introduce clear actions, targets, timelines, and dedicated funding streams to address Traveller and Roma child and family homelessness
- Ensure that Traveller and Roma communities are explicitly named, and that a clear process is established within all plans and frameworks being developed by the Department, in conjunction with the National Homeless Action Committee

2. Building New Traveller Specific Accommodation

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 the maintenance of existing Traveller accommodation rather than the provision of new units to meet existing and projected needs.

- Allocate a proportionate amount of the Traveller accommodation budget to the development of new Traveller-specific accommodation
- Introduce a robust monitoring, evaluation and accountability framework to ensure the full expenditure of funds allocated to Local Authorities for Traveller-specific accommodation, with clear targets and reporting on new units and an expectation that plans demonstrate how gender-responsive and culturally appropriate accommodation needs will be met

3. Data Collection and Ethnic Equality Monitoring

The true extent and impact of the housing and accommodation crisis on Travellers and Roma is unknown as Local Authorities do not collect ethnic data in relation to accommodation and homelessness. This information is necessary for ethnic equality monitoring of housing and homeless policies and services, particularly in relation to access and experience of housing supports and emergency accommodation, as well as exits from homelessness/ long term homelessness.

The lack of implementation of ethnic equality monitoring is notable across all national housing and homeless datasets, such as the Pathway Accommodation and Support System (PASS) and the Social Housing Needs Assessment. The current situation with a Traveller only question in the HNA is not compliant with a human rights-based approach as only one group (Travellers) are being asked their ethnicity. This was recognised by the independent Expert Review Group on Traveller Accommodation in its recommendation¹⁰ for a standardised ethnic identifier across all data collection systems, where an ethnic identifier is a universal question (asked of all applicants) and data collection and use is conducted within a human rights framework with clear guidelines and training for staff. This is also in line with commitments under the National Equality Data Strategy, and would improve understanding of differential impacts across gender, age and ethnicity.

- Implement ethnic equality monitoring, including the introduction of a standardised ethnic identifier in line with the national census, across all statutory and voluntary housing and homeless datasets. This includes datasets for allocations of social housing, and on homelessness and should incorporate gender-disaggregated analysis to capture the specific needs and experiences of Traveller and Roma women and girls

¹⁰ Independent Expert Group on behalf of the Minister of the Department of Housing, Planning and Local Government (2019) *Traveller Accommodation Expert Review*.

4. Alignment with Key Traveller and Roma Accommodation Commitments

The Government has already committed to a number of key Traveller and Roma accommodation actions within existing Traveller and Roma specific policy, including the National Traveller and Roma Inclusion Strategy,¹¹ the Traveller Accommodation Expert Review,¹² and the Local Authorities' Traveller Accommodation Programmes (TAPs).¹³ It is important that the accommodation actions within these policies are coordinated and monitored in a consistent way with the Child and Family Homelessness Action Plan to ensure their full and effective implementation and to avoid fragmentation across departments and agencies.

- **Ensure full alignment, resourcing and implementation between the Child and Family Homelessness Action Plan and existing Traveller and Roma accommodation commitments included in the National Traveller and Roma Inclusion Strategy, the Expert Group on Traveller Accommodation and Local Authority Traveller Accommodation Programmes (TAPs)**
- **Establish coordinated monitoring and reporting mechanisms across these frameworks**

5. Review Child and Family Homeless Support Processes through an Equality Lens

Inconsistencies in the application of housing policy and eligibility criteria have resulted in unequal access to and outcomes from emergency accommodation and housing supports, particularly for Roma families. For example, Local Authorities vary in how they interpret and apply the Housing Circular 41/2012.¹⁴ Some reportedly extend the Circular to all housing supports, including emergency homeless accommodation. Under the Public Sector Equality and Human Rights Duty, public bodies are legally required to promote equality, prevent discrimination and protect human rights. This provides a clear framework for assessing and responding to Traveller and Roma child and family needs in terms of accommodation and housing, including the specific needs of women and lone-parent households.

- **Include mechanisms for Local Authorities to review all housing and homeless application processes, ensuring compliance with the Public Sector Equality and Human Rights Duty and incorporating an assessment of gendered impacts, particularly for Traveller and Roma women who face additional barriers in accessing safe accommodation**

6. Inclusion of Targeted and Mainstream Measures to Prevent Traveller and Roma Child and Family Homelessness and Accelerate Exits

Addressing Traveller and Roma child and family homelessness requires a combination of mainstreamed and targeted measures across all areas of the Child and Family Homelessness Action

¹¹Dept of Children, Disability, Integration and Youth (2024) National Traveller and Roma Inclusion Strategy <https://www.gov.ie/en/department-of-children-equality-disability-integration-and-youth/publications/national-traveller-and-roma-inclusion-strategy-ii-2024-2028/>

¹² Independent Expert Group (2019) Traveller Accommodation Review <https://www.paveepoint.ie/wp-content/uploads/2023/08/Expert-Review-Group-Traveller-Accommodation.pdf>

¹³ Local Government Ireland Traveller Accommodation Programmes <https://www.localgov.ie/services/housing/traveller-accommodation>

¹⁴ Circular Housing 41/2012 - Access to Social Housing Supports for non-Irish nationals <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/circulars/circular-housing-412012-access-to-social-housing-supports-for-non-irish-nationals/>

Plan. As the Department develops new approaches to housing supply, homelessness prevention and service delivery under Delivering Homes, Building Communities, the needs of groups who are disproportionately impacted—particularly Travellers and Roma—must be embedded from the outset in policy design, research, implementation and monitoring.

For Traveller and Roma children and families homelessness is rarely short-term and is most often driven by long-standing structural barriers, including discrimination in the private rented sector, chronic shortages of culturally appropriate accommodation, poverty, overcrowding, insecure tenancies, and barriers accessing housing and social protection supports. These factors place Traveller and Roma families at heightened risk of both entering homelessness and remaining in emergency accommodation for prolonged periods. Effective prevention and accelerated exits therefore require measures that go beyond generic responses.

Responsibility for work with prioritised groups, such as Travellers and Roma, must be clearly assigned and all Department and Local Authority staff must be cognisant of the impacts of racism and discrimination on accommodation outcomes for Travellers, Roma and other marginalised groups.

The Plan should also include clear targeted actions that address Traveller and Roma accommodation inequality. This could include additional funding for targeted accommodation/homeless workers and programmes, as well as the development of accommodation options targeted to the specific needs of Travellers and Roma (for example, considering larger family sizes).

Traveller and Roma women face increased risks within homelessness pathways due to the combined impacts of racism, sexism, discrimination in housing, and exposure to domestic, sexual and gender-based violence. Relevant Government frameworks—including the National Strategy for Women and Girls 2025–2030 and the Zero Tolerance DSGBV Strategy—highlight these vulnerabilities. Traveller and Roma women disproportionately experience discrimination in the private rented sector, unsafe or overcrowded accommodation, and barriers accessing refuge or emergency homeless supports. The Department of Health-funded GENIO pilot demonstrated the value of culturally-appropriate, trauma-informed supports for Traveller women at risk of homelessness, but these initiatives ended without replacement despite clear evidence of need. Traveller women leaving prison also face very high risks of homelessness, contributing to recidivism and compounding addiction and mental-health challenges. Sustained, targeted measures are required across all pillars of the Child and Family Homelessness Action Plan to address these intersecting risks.

- **Ensure the needs of Travellers and Roma are mainstreamed across all pillars of the Child and Family Homelessness Action Plan, including prevention, emergency responses and exits, and reflected in all scoping and research commissioned by the Department (with gender- and age-disaggregated analysis)**
- **Embed gender-responsive and culturally appropriate actions for Traveller and Roma women across all pillars of the Child and Family Homelessness Action Plan, aligned with the National Strategy for Women and Girls 2025–2030**
- **Ensure full alignment with the Zero Tolerance DSGBV Strategy, including actions on refuge expansion, safe emergency accommodation and trauma-informed responses for women and children experiencing violence**
- **Provide multi-annual funding for Traveller and Roma accommodation and homelessness initiatives, including accommodation-focused projects and dedicated support roles within statutory and voluntary services**
- **Set clear, measurable targets to reduce the time Traveller and Roma children spend in emergency accommodation, with a particular focus on families experiencing prolonged or**

repeat homelessness, and monitor progress through disaggregated data in line with ethnic equality monitoring commitments

- **Appoint a National Accommodation Lead (at Senior Level) with specific responsibility for Traveller and Roma accommodation and homelessness, reflecting the scale and persistence of inequality**
- **Invest in early intervention and prevention measures for Traveller and Roma families at risk of homelessness, including eviction prevention, mediation with landlords and local authorities, and proactive responses to overcrowding and unsafe accommodation**
- **Provide targeted tenancy sustainment, advocacy and casework supports within housing and homeless services, including Traveller- and Roma-specific support workers, culturally appropriate supports and interpretation services where needed**
- **Deliver anti-racism and discrimination training (inclusive of anti-Traveller and anti-Roma racism) to housing workers and officials inclusive of the intersection of racism and gender**
- **Consider the needs of larger families and set targets for the provision of larger social/affordable housing units¹⁵**
- **Reinstate and sustain dedicated, culturally appropriate supports for Traveller women at risk of homelessness, building on learning from the Department of Health/GENIO pilot projects**
- **Develop targeted measures for Traveller and Roma women leaving prison**

7. Impacts of Proposed Amendments to the Housing Act 1988

We are aware that the Department is also considering amendments to national housing legislation, with a recent review of sections 2 and 10 of the Housing Act 1988.¹⁶ The proposed new amendments seek to introduce further restrictions on eligibility criteria for accessing emergency accommodation.¹⁷ We hold deep concerns about the potential exclusionary and discriminatory nature of the proposed amendments, which would undoubtedly have a disproportionate impact on the Roma community as well as other marginalised groups. The amendments would include requiring habitual residency as a condition for access to section 10 funded 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 would undermine the State's efforts to meet its international human rights obligations, and push many Roma children out of homeless services with no alternative to rough sleeping on the street. Concerns about the discriminatory impact of the Habitual Residence Condition on Roma access to basic social protections has been widely documented by Pavee Point, along with IHREC, and a number of international human rights bodies.¹⁸

¹⁵ Recent Government commitments, including the €50 million allocation to assist Local Authorities in acquiring larger family homes (particularly four-bed units), represent an important step in addressing long-term family homelessness. These measures should explicitly prioritise Traveller and Roma families, who are disproportionately represented among larger households and long-term homeless families. Clear guidance is needed to ensure equitable access and culturally appropriate allocation.

¹⁶ Pavee Point's full submission to the Department on proposed amendments to housing act <https://www.paveepoint.ie/wp-content/uploads/2023/12/Pavee-Point-Consultation-on-Proposed-Amendments-to-the-Homelessness-Related-Aspects-of-the-Housing-Act-1988-1-1.pdf>

¹⁷ Pavee Point Traveller and Roma Centre (2023) Submission to the Department of Housing, Local Government and Heritage: Consultation on Proposed Amendments to the Homelessness Related Aspects of the Housing Act 1988. <https://www.paveepoint.ie/wp-content/uploads/2023/12/Pavee-Point-Consultation-on-Proposed-Amendments-to-the-Homelessness-Related-Aspects-of-the-Housing-Act-1988-1-1.pdf>

¹⁸ 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

The reasons given in the Department's note for reviewing the homelessness provisions in the Housing Act are listed as the rising homeless figures, the changing demographics (with a particular focus on EEA migrants), and the lack of clear housing pathways for some people living in emergency accommodation. We believe the focus should not be on changing the eligibility for homeless supports, which will exclude some of those most in need, but rather the Department must tackle the underlying causes of homelessness and the difficulties progressing out of homeless services. Without clearly defined entitlements for all those who are in the State needing shelter, it is possible that a two tier, inequitable system will develop, and that some of the most marginalised will be pushed outside of the system entirely.

- **Conduct a wider consultation on the proposed amendments to the Housing Act 1988, focusing on human rights compliance (Section 42 IHREC Act 2014) and the prevention of discriminatory outcomes for marginalised groups in accessing housing and homeless supports**

8. Implementing the ETHOS Definition of Homelessness

The European Commission has urged Member States to adopt the European Typology of Homelessness and Housing Exclusion (ETHOS) definition of homelessness to ensure a common European wide understanding of the term. The ETHOS encompasses both homelessness and housing exclusion as they are intrinsically linked.¹⁹ The ETHOS is a comprehensive framework that captures the complexity of homelessness and includes: rooflessness, houselessness, living in insecure accommodation, and living in inadequate accommodation, as such, it includes the following categories of people who are:

1. Sleeping rough
2. In emergency accommodation, such as overnight shelters
3. In accommodation for the homeless (hostels, shelters, refuges, transitional)
4. In institutions with no housing to which to go subsequently (release from prisons, medical institutions)
5. Forced to live in temporary structures (including mobile homes/trailers), due to lack of housing and/or appropriate provision of accommodation
6. Forced to live with family or friends due to lack of housing, not own residence ('couch-surfing')

The ETHOS system has been accepted as the standard tool of definition and measurement across almost all European countries (and outside the EU14), including by the Irish government and was the instrument endorsed in the government homeless policy *The Way Home*. Pavee Point has consistently used the ETHOS definition of homelessness to demonstrate that Travellers and Roma constitute a large number of the 'hidden homeless' population in Ireland as they are forced to double/treble up with family members in already severely overcrowded situations. In order for the Action Plan to tackle the crisis effectively, its measures need to focus on addressing the broader experiences of homelessness as covered by the ETHOS definition.

- **Apply and implement the ETHOS definition of homelessness, which has been accepted as the standard tool of definition and measurement across almost all European countries**

¹⁹ Baptista, I. and Marlier (2019) Fighting homelessness and housing exclusion in Europe: A study of national policies. Brussels: European Commission