

The Framework Convention for the Protection of National Minorities

Fifth Periodic Report

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Introduction

Background

1. The Council of Europe has been a central force in promoting the values of human rights, democracy and the rule of law across this continent since its inception in the aftermath of the Second World War. Ireland, a founding member of the Council of Europe, has consistently supported the Council's work to advance the cause of peace and prosperity in Europe, through reconciliation and cooperation between States and peoples, on the basis of shared fundamental values and common principles.
2. Ireland's support for the Framework Convention for the Protection of National Minorities (the "Framework Convention") is a manifestation of its deep commitment to the Council of Europe and, in particular, to its efforts to combat intolerance and discrimination. Ireland's commitment to ratify the Framework Convention stemmed from the 1998 Good Friday ("Belfast") Agreement, which contained interlocking commitments by both the British and Irish Governments on a range of human rights issues.
3. Ireland signed the Framework Convention on 1 February, 1995. It was ratified on 7 May, 1999, and entered into force on 1 September, 1999. Ireland subsequently submitted its State Reports as follows:
 - First State Report on 13 November 2001;
 - Second State Report on 03 January 2006;
 - Third State Report on 18 July 2011; and
 - Fourth State Report on 3 July 2017.
4. Ireland's responsibilities under the Framework Convention, with special regard to the position of the Traveller and Roma communities in Ireland, were an important and impactful feature of its Presidency of the Council of Europe in 2022. During the Presidency, Ireland supported the advancement of Traveller and Roma affairs at an international level, by hosting the 6th meeting of the Council of Europe Committee of Experts on Roma and Traveller Issues in September 2022 and contributing to a conference held on the margins of the meeting, *Irish Travellers / Mincéirs & the State, 1922-2022, the Struggle for Equality*¹ hosted by the University of Galway.

¹ *Irish Travellers / Mincéirs & the State, 1922-2022, the Struggle for Equality*, 16-17 September 2022, conference programme available at <https://mooreinstitute.ie/event/irish-travellers-minceirs-the-state-1922-2022/>

5. Ireland welcomes the opportunity to update the Advisory Committee on the Framework Convention for the Protection of National Minorities (the “Advisory Committee”) on the progress made here since the fourth reporting cycle and, in accordance with Article 25 (2) of the Framework Convention, hereby presents its Fifth State Report.

The Scope of the Framework Convention as it applies to Ireland

6. Ireland notes the call of the Advisory Committee to maintain an inclusive and open approach towards the scope of application of the Framework Convention. Ireland is happy to affirm that it will continue to engage in a wide-ranging dialogue with the Advisory Committee and to provide such information as the Advisory Committee may consider is useful.
7. Ireland reiterates that a definition of what constitutes a national minority is not fixed in international law, nor is there such a definition in the Framework Convention nor is it defined in Irish law. Ireland has not made a declaration on the application of the Framework Convention to any particular national minority, and it is important to note that Ireland does not recognise Irish Travellers as a national minority, understanding this to be a concept not applicable to their self-identification as an ethnic group of the Irish nation with a distinct heritage, culture and identity. The acknowledgment of the Traveller community as a distinct ethnicity led to its formal recognition in the Dáil [Irish parliament] on the 1 March 2017, and demonstrates an important evolution in the status of Irish Travellers and in the way that they are perceived in Irish society.
8. As stated in Ireland’s previous State Reports under the Framework Convention, the Government of Ireland also wishes to underline that not all ethnic, cultural, linguistic or religious differences point to the existence of a national minority. To ensure consistency in Ireland’s statements on the matter, the Irish Government would like to reiterate that the Fifth State Report, like our previous State Reports, substantially deals with matters relating to Travellers while also commenting on a wider range of issues in respect of its diverse population. The information is provided without prejudice to the fact that Ireland does not have a defined national minority and that migrant groups do not come within the scope of the Framework Convention. However, a range of protections for groups and individuals on matters which are dealt with under the Framework Convention are provided for under Irish law.

9. Notwithstanding the fact that members of the Traveller community are not recognised as a national minority in Ireland, successive Governments have recognised the special position of Travellers in a range of legislative, administrative and institutional provisions designed to protect their rights and improve their position. They have been named, for instance, as a group requiring specific protection in Ireland's equality legislation.
10. The Government of Ireland is committed to improving the lives of the Traveller and Roma Community in Ireland. The strategy to further this goal, the *National Traveller and Roma Inclusion Strategy 2017 – 2021*² (NTRIS), represents a whole of Government approach to bring meaningful change and progress for the Traveller and Roma communities in Ireland. It brings Government Departments and Agencies together along with representatives of both Traveller and Roma communities to bring a focus to the issues which affect them most in a structured way.

The strategy has worked to support action towards a more progressive, fair and equal country. Notable achievements that indicate real progress in Ireland in recent years include the formal recognition of Traveller ethnicity in 2017, which has confirmed the readiness of Irish society to recognise the particular situation of Travellers and their culture. The State's formal recognition of Irish Travellers ethnicity has been described as a "historic" day for Travellers and for Ireland. The announcement was supported by all parties in the Oireachtas [Irish parliament]. The recognition of the distinct heritage, culture, and identity of Travellers and of their special place in Irish society was both symbolically and socially important in our work to overcome the economic marginalisation and discrimination of members of the Traveller community.

NTRIS contains 149 actions, grouped under ten themes including Cultural Identity; Anti-Discrimination and Equality; Education; Employment; Health and Accommodation. Progress on these actions is monitored by a Steering Committee which includes both Traveller and Roma representatives and Civil Society organisations. The Minister for Children, Equality, Disability, Integration and Youth chairs the NTRIS Steering Committee. The current focus of Government is the development of the next iteration of the NTRIS, which will seek the views of a range of stakeholders to determine what

² *National Traveller and Roma Inclusion Strategy 2017 – 2021*, available at <https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

should be included and prioritised in the successor to the current NTRIS. The successor Strategy is expected to be published by end 2023.

11. The National Traveller and Roma Inclusion Strategy has provided the framework for innovative actions to identify needs. The Pavee Point Traveller and Roma Centre, for instance, in partnership with the Department of Justice and Equality, conducted a peer-led Roma Needs Assessment analysis which trained Roma workers to engage with their community across Ireland to identify key barriers to service provision. On 18 January 2018, *Roma In Ireland: a National Needs Assessment*³ was published. Two new funding streams were introduced in 2018 to address some of the areas of concern highlighted in the participative research on the Roma community. Six projects received funding totalling €210,000 under the National Funding to Promote Roma Inclusion 2018-2020 programme for activities to support the inclusion of Roma communities within Irish society. This funding was available to the successful projects until the end of 2020. In addition, a call for proposals to generate employment for the Roma community in Ireland was made in October 2018 and a total fund of €500,000 was made available in 2019 for seven community-based projects.
12. In October 2020, the Minister for Children, Equality, Disability, Integration and Youth assumed responsibility for and oversight of the implementation of the actions under NTRIS. Prior to October 2020, this was the responsibility of the Minister for Justice and Equality. Under the NTRIS, funding is made available to Traveller and Roma organisations to support their core activities, and to progress specific commitments. In 2020, €3.8 million in funding was provided to support Traveller and Roma inclusion. To counteract the significant impact that COVID-19 has had on the Traveller and Roma communities, an additional €1 million was granted for 2021, bringing the total to just under €5 million. The funding is used to support existing, as well as new initiatives for Travellers and Roma, such as employment and social inclusion projects, education pilots, Traveller mediation and counselling services, and to promote and celebrate Traveller and Roma culture. In 2023, provision was made for a 5% increase in expenditure on Traveller and Roma initiatives, bringing total spending to

³ *Roma In Ireland: a National Needs Assessment*, January 2018, available at <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

€5.942 million. This increased allocation reflects a deep-rooted commitment to the continuing drive to achieve equality for the Traveller and Roma communities within Irish society. Departments managing the key sectoral issues (such as the Department of Health for health issues, the Department Education for education matters, the Department of Housing for accommodation issues, etc.) have their own specific budgets for Traveller and Roma initiatives.

13. The *Programme for Government: Our Shared Future 2020-2025* contains several commitments related to supporting Traveller and Roma Communities, including:

- Implement a National Traveller Health Action Plan.
- Review the National Traveller and Roma Inclusion Strategy 2017-2021 and ensure that the successor strategy has a stronger outcomes focused approach. As part of this, we will develop a comprehensive Traveller and Roma Training, Employment and Enterprise Plan.
- Undertake an independent assessment of the pilot projects aimed at retaining Traveller and Roma children in education.
- Ensure that the housing needs of the Traveller Community are met by local authorities and ensure that existing funding is fully drawn down and utilised.
- Provide additional supports for students who are homeless, resident in family hubs, or in direct provision. Further develop access programmes to Higher and Further Education for students from disadvantaged groups, including members of the Traveller Community, those in direct provision, and those who are socio-economically disadvantaged.
- Task the NCCA [National Council for Curriculum and Assessment] to develop an Irish Cultural Studies Junior Cycle level 2 short course, which values the heritage, language, nature, biodiversity, and culture (including Traveller culture and history) of Ireland and history of the Irish Language in the global landscape.
- Continue with, and expand, the *National Plan for Equity of Access to Higher Education* and develop a National Traveller Education Strategy, including a plan to improve access to Higher Education for members of the Traveller Community.
- Publish a Traveller and Roma Mental Health Action Plan.

- Ensure in-reach supports and pathways to access to treatment for homeless, Traveller and new communities.

This State Report deals with certain issues in relation to the Roma community in Ireland as, notwithstanding the statement in paragraph 7 above that migrant groups do not come within the scope of the Framework Convention, and similar to Irish Travellers, Roma have specific needs and can be at high risk of marginalisation and discrimination. Travellers and Roma are linked in Ireland's National Traveller and Roma Inclusion Strategy.

The structure of the Fifth State Report

14. The structure of this Report follows the recommendations of the Advisory Committee set out in ACFC/III(2013)001 of 30 April 2013, adopted by the Advisory Committee at its 64th plenary meeting (4-8 March 2019).
15. In line with the recommendations of the Advisory Committee set out in ACFC/III(2013)001 of 30 April 2013, this report has been divided into three sections:
 - Section I. Practical arrangements made at the national level for raising awareness of the results of the fourth monitoring cycle and of the Framework Convention;
 - Section II. Measures taken to address core issues; and
 - Section III. Further measures taken to improve the implementation of the Framework Convention.

This report addresses the recommendations adopted by the Committee of Ministers, contained in Resolution CM/ResCMN(2019)14 on the implementation of the Framework Convention for the Protection of National Minorities by Ireland and the additional recommendations presented in the Advisory Committee's Fourth Opinion.

Section I. Practical arrangements made at the national level for raising awareness of the results of the fourth monitoring cycle and of the Framework Convention.

- (a) Steps taken to publicise the results of the fourth monitoring cycle (Opinion, State comments, Resolution): publication, dissemination and translation into the official language(s) and minority language(s) where appropriate;
- (b) Any follow-up activities organised at national, regional and local levels, including activities organised jointly with the Council of Europe, such as discussions, seminars, evaluations, impact assessments, studies etc., and the outcomes of these events;
- (c) Participation of minority organisations and other non-governmental organisations in the authorities' implementation and monitoring of the Framework Convention, and their involvement in the preparation of the fifth report;
- (d) Any other measures taken to promote awareness of the Framework Convention among national minorities, public officials and the general public.

Practical arrangements at national level to follow up previous monitoring cycles

- 16. To publicise the results of previous monitoring cycles and to promote awareness of the Framework Convention itself, a description of the Framework Convention was made available on the website of the Department of Children, Equality, Disability, Integration and Youth, together with a link to Ireland's State Reports from previous monitoring cycles. Information about the preparation of the Fifth State Report was also made available on this Department's website.

Initiatives to promote awareness of the Framework Convention's provisions

- 17. A number of initiatives have taken place that promote awareness of the provisions of the Framework Convention or that address matters raised in the Opinion issued by the Advisory Committee on conclusion of the fourth monitoring cycle.

18. A Joint Committee of the Oireachtas [Irish Parliament] on Key Issues Affecting the Traveller Community (the “Joint Committee”) was established in September 2020 to undertake a programme of work examining health, education, employment and accommodation and to make policy recommendations related to each policy theme.
19. The Joint Committee was chaired by Senator Eileen Flynn, who, following her nomination as a Senator in June 2020, became the first Traveller to serve in the Oireachtas.
20. The Joint Committee sought submissions and heard public hearings on four main topics:
 - physical health, mental health and suicide levels;
 - school completion rates and educational attainment, particularly at second and third level, as compared to the settled population;
 - labour market participation, having regard to the unemployment rate of 80 per cent among Travellers; and,
 - access to housing and accommodation, including Traveller-specific accommodation, in the context of the significantly higher homelessness rate among Travellers compared to the settled population.
21. The Joint Committee received written submissions from a wide range of stakeholders on each of the key issues in their work programme and consulted representatives from Traveller organisations – both national and local – as well as a large number of other stakeholders, including Ministers and Government Departments, State Agencies, NGOs and advocacy groups, social enterprises, the Ombudsman for Children and other interested stakeholders.
22. The final report of the Joint Committee⁴ was issued in 2021. This report raised many key issues and listed 84 recommendations that involved work across several Departments. The cross party nature of the report gave this document a particular importance. A number of discussions on the issues affecting the Traveller community took place in the Houses of the Oireachtas and the extensive newspaper and social media coverage raised

⁴ *Final Report of the Joint Committee on Key Issues Affecting the Traveller Community*, Houses of the Oireachtas, November 2021, available at <https://www.oireachtas.ie/en/committees/33/committee-on-key-issues-affecting-the-traveller-community/>

awareness of the challenges faced by Travellers within the wider community.

23. The recommendations of the Joint Committee on Key Issues Affecting the Traveller Community serve to inform the ongoing development of policy measures – such as the National Traveller and Roma Inclusion Strategy, the National Traveller Health Action Plan, and the National Action Plan Against Racism – taken to further the full and fair inclusion of the Traveller and Roma communities in Irish society.
24. The Department of Children, Equality, Disability, Integration and Youth (DCEDIY) supported the conference *Irish Travellers / Mincéirs and the State, 1922-2022: the Struggle for Equality*, held in the University of Galway on 16-17 September 2022. This conference represented an opportunity for presentation, exchange and reflection on a range of matters, not just in terms of historical review but also in the exploration of issues that are relevant to Traveller life in Ireland today, ranging from accommodation and access to the law, through to culture, addressing trauma, challenging discrimination and dealing with inequality in education.
25. A strong international input was achieved at the Galway conference through the involvement of members and secretariat of the Council of Europe Expert Group on Traveller and Roma Issues, ADI-ROM, who joined the conference on completion of the 6th meeting of the group, also held in the University of Galway, the previous day. This allowed for comparison of the Traveller experience in Ireland with that of the Roma community across Europe through, for example, the presentation on good practice in the field of Roma language, education and culture.
26. Finally, the results of the fourth monitoring cycle were disseminated by civil society groups, many of which are funded by the Department of Children, Equality, Disability, Integration and Youth.

Preparation of the Fifth State Report

27. Ireland's Fifth State Report has been prepared by the Department of Children, Equality, Disability, Integration and Youth, in consultation with all other relevant Government Departments and with the participation of National Traveller and Roma organisations.

28. Traveller and Roma representative organisations, and interested parties, were invited to submit their observations in writing, in response to the draft report. The comments submitted were taken into account when compiling the final draft; however, partly as a result of the constrictions imposed by the structure of the report as laid down, and given that some of the contributions offered evaluative comment on the actions reported, it was not found possible to make textual amendments to reflect the full content of the submissions received. As it was considered that the content in question offered very useful contextual comment on the actions reported from the perspective of the Traveller and Roma organisations, it was decided to incorporate the full content of the submissions as an Appendix to the Report. It was felt that this approach offered the advantage of transparency, given that it enables the entirety of the views expressed to be represented.

Other relevant Council of Europe and European Union work

29. The respect and promotion of human rights continues to be a cornerstone of Irish foreign policy. Ireland actively works to uphold Council of Europe values of democracy, human rights and the rule of law. Last year, Ireland held the Presidency of the Council of Europe for the seventh time and pursued three immediate objectives:
- “Our Founding Freedoms”: reinforcing Human Rights & the Protection of Civilians in Europe;
 - “Hear Our Voices”: promoting Participatory Democracy & Youth Engagement; and,
 - “Fáilte”: fostering a Europe of Welcome, Inclusion, & Diversity.
30. Ireland hosted the sixth meeting of the Council of Europe Committee of Experts on Roma and Traveller Issues, ADI-ROM, in the University of Galway, on 14-15 September 2022. The meeting included a visit to halting sites and allowed the Committee to focus more on the experiences of Irish Travellers. The ADI-ROM has worked to provide invaluable discussion opportunities and share its combined expertise on the important topics of diversity, integration and inclusion. This working collaboration allows us to examine and discuss how we in Ireland, and more broadly in Europe, are meeting these vital challenges and to ensure successful inclusion outcomes for the Roma and Traveller communities in our respective countries. ADI-ROM members also took part in a conference hosted by the University of

Galway Irish Travellers / Mincéirs & the State, 1922-2022, the Struggle for Equality.

31. Ireland participated to the 15th European Platform for Roma Inclusion and meeting of National Roma Contact Points (NRCP) in Prague in October 2022. The European Platforms for Roma Inclusion, held annually, are the highest political event on Roma issues, bringing together national governments, the EU, international organisations and Roma civil society with the aim of stimulating cooperation and an exchange of experience on successful Roma inclusion.
32. The Government's National Traveller and Roma Inclusion Strategy 2017 – 2021 is consistent with the main objectives of the EU Roma strategic framework on equality, inclusion and participation 2020-2030 adopted by the European Commission. The Council of Europe and EU standards, and in particular the outcomes of the previous Monitoring Cycles, will inform the development of the next iteration of NTRIS.

Section II. Measures taken to address core issues

- (a) Please provide information on how each of the specific recommendations for immediate action included in Part 2 — "Issues for immediate action" of the Committee of Ministers' Resolution have been implemented. Indications on other policies, measures and needs assessments considered relevant in this context should also be provided.

Adopt an implementation plan, in close co-operation with Traveller and Roma communities, with clear targets, indicators, timeframe and resources with respect to all health-related, accommodation-related and other socio-economic measures listed in the National Traveller and Roma Inclusion Strategy and implement such measures without delay; ensure that measures taken are monitored and that they address their respective objectives, in particular with regard to tackling the problem of underspending allocated accommodation budgets.

Review of National Traveller and Roma Inclusion Strategy (NTRIS)

33. The Programme for Government (2020) committed to carry out a review of the NTRIS and to ensure that the successor strategy has a stronger outcomes focused approach. Work on the development of the successor strategy to the NTRIS, led by DCEDIY, is now underway:
- The NTRIS Steering Committee, which is chaired by the Minister and includes representatives of Traveller and Roma civil society groups as well as Government Departments and State Agencies, has been reviewing achievements under key strategic themes and so far has addressed accommodation, education, employment, health and justice.
 - Members of the Steering Committee contributed to a high-level reflection exercise on the strengths and weaknesses of NTRIS, and on the content of the new Strategy; this consultation was developed further in March 2023 through an externally facilitated discussion at Steering Committee level.
 - Arrangements are being finalised for the conduct of parallel consultations with local Traveller and Roma groups, community groups and individuals; this process, to be overseen by a working group comprising DCEDIY and representatives of the national Traveller and Roma organisations, is expected to be completed by end October 2023.

34. The drafting of the successor strategy to the NTRIS has commenced and it is intended that the content should be broadly finalised by end 2023. The new strategy will have a stronger outcomes focused approach, consistent with the Programme for Government commitment. It will also incorporate a strong implementation structure, with achievable actions, clear key performance indicators and a robust monitoring system, all of which respond to recommendations addressed in the Fifth State Report.
35. Separately, the report of an independent evaluation on the processes for implementation of NTRIS and two other national equality strategies (National Strategy for Women and Girls and Migrant Integration Strategy) is expected to be published shortly. The independent evaluation has focused in particular on identifying ways to improve monitoring and implementation of the equality strategies.

Health

36. Improving health outcomes for Travellers is a particular focus because of the continuing health inequalities faced by Travellers. There are 42 health-related actions listed under the NTRIS, including 10 actions relating to mental health and suicide among Travellers, while the Programme for Government (2020) contains two health-related commitments: implement a National Traveller Health Action Plan and publish a Traveller and Roma Mental Health Action Plan.
37. The Health Service Executive (HSE) launched the *Second National Intercultural Health Strategy 2018-2023*⁵ in January 2019. This five year strategy was published on 15 January 2019 and provides a comprehensive and integrated approach to addressing the health and support needs of health service users with ethnic and cultural backgrounds.
38. Under Action 73 of NTRIS, the HSE committed to develop and implement a detailed action plan, based on the findings of the *All Ireland Traveller*

⁵ *Second National Intercultural Health Strategy 2018-2023*, January 2019, available at <https://www.hse.ie/eng/about/who/primarycare/socialinclusion/intercultural-health/intercultural-health-strategy.pdf>

Health Study (2010)⁶, to continue to address the specific health needs of Travellers, using a social determinants approach. The National Traveller Health Action Plan (the “NTHAP”) 2022 – 2027⁷ was launched on 28 November, 2022. The Department of Health is providing additional ring-fenced funding of €1 million in 2023 to support the implementation of the plan, with a further €300,000 specifically for mental health services. As a first step towards a comprehensive response to Traveller mental health, the National Traveller Health Action Plan contains six actions on Traveller mental health. These reflect the priority given to Traveller mental health in *Sharing the Vision – A Mental Health Policy for Everyone*⁸, 2020, *Connecting for Life: Ireland’s National Strategy to Reduce Suicide 2015-2020*⁹ (extended to 2024) and the *National Traveller and Roma Inclusion Strategy 2017-2021*.

39. The NTHAP acknowledges the health inequalities that Travellers experience and is working to address their specific health needs, using a social determinants approach. The NTHAP has provided the framework to expand and strengthen the Primary Health Care for Traveller Projects. It will also address the need for culturally safe and appropriate provision of health care for Travellers. The annual Health Service Executive (HSE) expenditure on Traveller specific health initiatives is in the region of €10 million, including €350,000 on Traveller mental health. The HSE has recruited two dedicated Traveller Health posts to develop Traveller health policy and coordinate implementation of the NTHAP.
40. There are 4 goals in the Traveller Health Action Plan, with 45 associated actions.
- GOAL 1: Strengthen the governance, monitoring and structures to support the implementation of the Action Plan.
 - GOAL 2: Improve Traveller’s equality of access, participation and outcomes in mainstream health services through a human-rights based approach.

⁶ *All-Ireland Traveller Health Study*, 2010, available at <https://www.gov.ie/en/publication/b9c48a-all-ireland-traveller-health-study/>

⁷ *National Traveller Health Action Plan 2022 – 2027*, November 2022, available at <https://www.hse.ie/eng/services/publications/socialinclusion/national-traveller-health-action-plan-2022-2027.pdf>

⁸ *Sharing the Vision – A Mental Health Policy for Everyone*, 2020, available at <https://www.gov.ie/en/publication/2e46f-sharing-the-vision-a-mental-health-policy-for-everyone/>

⁹ *Connecting for Life: Ireland’s National Strategy to Reduce Suicide 2015-2020* (extended to 2024), available at <https://www.gov.ie/en/publication/7dfe4c-connecting-for-life-irelands-national-strategy-to-reduce-suicide-201/>

- GOAL 3: Address the Social Determinants of Traveller Health through targeted and mainstream measures.
 - GOAL 4: Enhancing Travellers' access to culturally appropriate primary health care through investment in Traveller Health units and Primary Health Care for Traveller Projects.
41. The Action Plan has structures in place to support the implementation of the plan, including a new NTHAP implementation Group. The HSE is working in partnership with Traveller Health Units and Primary Healthcare for Traveller Projects to develop regional implementation plans.
42. The HSE Social Inclusion and Primary Care services provide support to a range of primary care projects and other initiatives for Travellers, such as the Traveller Health Units and Primary Health Care for Travellers Projects. The HSE National Social Inclusion Office also works in partnership with other HSE services, statutory Agencies and non-governmental organisations, including Pavee Point Traveller and Roma Centre, and Cairde, to improve the health status of members of the Roma community. The National Roma Infoline was established in March 2020 to address the disproportionate impact of the COVID-19 pandemic on Roma in Ireland and is now in its fourth year of operation. As of March 2023, the Infoline has responded to some 9,000 calls from service providers and Roma. The Infoline plays a crucial role in addressing the immediate needs of Roma including access to medical care and services.
43. Traveller Health Units (THU) were established nationally to address Traveller health inequalities through ensuring the provision of culturally appropriate services to Travellers. The model is a partnership between HSE staff and Traveller representatives. THUs seek to monitor the delivery of services to Travellers and set regional targets against which performance can be measured; they also:
- ensure that Traveller health is given prominence on the agenda of the HSE;
 - ensure coordination and liaison within the HSE and between the HSE and other statutory and voluntary bodies in relation to the health situation of Travellers;
 - enable the collection of data on Traveller health and utilisation of health services;

- ensure appropriate training of health service providers in terms of their understanding of and relationship with Travellers; and,
 - support the development of Traveller specific services, directly by the Community Healthcare Organisations (CHO) or indirectly through funding appropriate voluntary organisations.
44. Action 78 of NTRIS states that the HSE “will develop primary healthcare projects for Roma based on the Traveller Primary Healthcare Project model and informed by the findings of the National Roma Needs Assessment for Roma in Ireland”. There are 27 Primary Health Care for Travellers Projects (PHCTP) across Ireland, focusing on providing primary healthcare to members of the Traveller community, under the remit of seven Traveller Health Units. The Primary Health Care for Travellers Projects fall within the HSE Community Health Organisation boundaries and are funded via the Community Health Organisation structures. Traveller peer workers are an important part of these projects, and their positive impact on access to care for the Traveller community has been noted. Primary Health Care for Travellers Projects are also important vehicles for community engagement and have been identified as a key means of building trust between Traveller communities and health professionals at a local level. The objectives of the Primary Health Care for Travellers Projects are to:
- establish Primary Health Care as a Model of Good Practice to address Travellers’ Health;
 - develop the skills of Travellers in providing community-based health services;
 - liaise and assist in dialogue between Travellers and health service providers; and,
- highlight gaps in health service delivery to Travellers and work towards reducing inequalities that exists in established services.
45. Notwithstanding the ongoing health issues faced by Travellers, the Primary Healthcare for Traveller Projects model has achieved the following successes:
- Women health’s screening is two times higher for Travellers than for the general population: 25% of Traveller women had breast screening for cancer, compared with 13% of women in the general population and 23% of Traveller women had a cervical smear test compared with 12% of women in the general population;

- 300 Traveller Community Health Workers are employed nationally and 83% of Travellers receive Health information from PHCTPs;
 - there is an uptake in antenatal services and booking for birth and 100% of Traveller babies are delivered in a maternity unit;
 - 96% of Traveller infants received vaccinations; and,
 - there is a 35% reduction in Traveller women's overall mortality.
46. The COVID-19 crisis has had a disproportionate impact on the most vulnerable members of society, including Travellers and, in particular, the Roma community. The Department of Justice and Equality participated in the National Public Health Emergency Team (NPHE) vulnerable persons subgroup which closely monitored the effect of the crisis on these groups and identifying specific supports, including the establishment of a specific hotel where newly arrived Roma could stay while quarantining. Through Pavee Point Traveller and Roma Centre, funding was also provided to fund Roma health workers who provided support and advocacy to the Roma community.
47. Additional funding was provided to Traveller and Roma organisations for the continued provision of necessary services during the COVID-19 crisis. This included short-term funding immediate needs for Roma without means of support, funding for interpretation services for Roma healthcare providers on an ongoing basis and funding for the production of public health information materials in appropriate languages or format for the Traveller and Roma communities. Resources were provided where required and the community sector mobilised to protect vulnerable individuals, families and communities.
48. While the COVID-19 emergency pandemic impacted on the delivery of health actions in the NTRIS, immediate health needs of the Traveller and Roma communities were addressed. The National Immunisation Committee (NIAC), recognised the high levels of COVID-19 morbidity and mortality within the Traveller and Roma communities. Traveller and Roma were prioritised for the vaccine and the Department of Health worked with local groups to roll out the vaccine. There was also significant engagement with key Traveller and Roma leaders and activists to produce podcasts to promote the importance of the vaccine for combating COVID-19.

49. There are positives to be drawn from the public health response to COVID-19 in the Traveller community. It put in place measures to improve living conditions in the congregated settings in which Travellers live and, together with Traveller organisations, provided tailored solutions to mitigate outbreaks and to increase take-up of vaccines. The approaches of the regional Departments of Public Health in the HSE to working with the Traveller Health Units and Travellers organisations during the COVID-19 pandemic were dynamic and required a high level of engagement and bespoke response and direct action to interrupt the cycles of transmission. The Regional Departments of Public Health were able to link effectively and build trust with Traveller communities through their grassroots partnerships with the Primary Health Care Projects and the Traveller Health Units. This approach helped significantly with vaccine advocacy and health promotion activities. The NTHAP is an opportunity to build on the momentum and mobilisation in public health during COVID-19 to create sustainable improvements in Traveller health.

Accommodation

50. One objective of the NTRIS is to provide for “adequate provision of accessible, suitable and culturally appropriate accommodation available for Travellers”. The Government is continuing to make improvements to the provision of appropriate accommodation for Travellers and a dedicated budget is in place to fund the delivery of a Traveller-specific accommodation programme, aimed at providing accommodation in line with the cultural preferences of the Traveller community, and ensuring suitable accommodation options for Traveller families are available in local authority areas. Progress has been made on ensuring that the funding allocated to local authorities for Traveller accommodation is being spent for that purpose. The full Traveller-specific accommodation budget for 2020 of €14.5 million was utilised, with a particular emphasis on measures which helped to minimise the spread of Covid-19. The 2021 and 2022 budgets were also fully spent and funding under the programme continues to increase, with €20 million being made available in 2023.

51. *Housing for All: A New Housing Plan for Ireland*¹⁰, the Government's housing plan to 2030, confirms a 'Housing Led' approach to tackling homelessness for all groups, and includes specific responses for members of the Traveller Community. An "Ethnic Identifier" is now included on the Social Housing Support application form (effective from March 2022), which will allow for more evidence-based planning for Traveller-specific accommodation, such as permanent halting sites and group housing schemes, and will support the Traveller Accommodation Programmes. In addition, delivery will be tracked under *Housing for All* and reported in progress reports against the new build social housing targets.
52. In 2018, the Traveller Accommodation Expert Group was established by the Minister of State at the Department of Housing, Planning and Local Government (DHPLG, now known as the Minister of State at the DHLGH) to review the Housing (Traveller Accommodation) Act 1998 and other legislation impacting on the provision and delivery of accommodation for Travellers. The aims of the Expert Group are to review the effectiveness of the 1998 Act, and whether it provides a robust legislative basis for meeting the current and future accommodation needs of the Traveller Community, and to review other legislation that impacts on the delivery of Traveller-specific accommodation, including transient accommodation.
53. In July 2019, the *Traveller Accommodation Expert Review* report¹¹ was published on behalf of the Minister of the DHPLG. The report sets out an integrated set of recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act 1998. In early 2021, the Department of Housing, Local Government and Heritage established an independently chaired Programme Board, on which members of the Traveller community are represented, to drive implementation of the 32 recommendations contained in the Traveller Accommodation Expert Review report. The Programme Board reports progress on implementation of the 24 (of the total 32) recommendations in its work programme. The most recent

¹⁰ *Housing for All: A New Housing Plan for Ireland*, 2021, available at <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

¹¹ *Traveller Accommodation Expert Review* report, 2019, available at [gov.ie - Traveller Accommodation Expert Review - Programme Board Update \(www.gov.ie\)](https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/). The latest report includes the January 2023 update on the recommendations selected by the Programme Board.

update report published in January 2023 indicates that 8 recommendations have now been completed.

54. In 2020, COVID-19 impacted on the delivery of recommendations outlined in the Traveller Accommodation Expert Review Report. Due to the emergency pandemic, there was a particular emphasis on measures to minimise the spread of COVID-19. Since the start of the COVID-19 emergency, the DHLGH worked closely with local authorities in an effort to implement preventative measures on all Traveller sites, both official and unofficial, regardless of their designation. In doing so, local authorities put a number of temporary arrangements in place to provide, among other things, services to previously un-serviced sites, which facilitated better sanitation and social distancing. In addition to these measures, the Department worked in conjunction with the Health Service Executive and local authorities, and a COVID-19 Preparedness Checklist was developed to strengthen COVID-19 preparedness, and infection prevention and control in authorised and unauthorised Traveller halting sites and local authority Traveller-specific Group Housing Schemes. The checklist was used as a toolkit for local action by identifying areas that required additional supports during the pandemic. Just over 250 halting sites were audited for COVID-19 preparedness and a list of deficiencies and checklist of works were prepared for each site where required. This resulted in an investment of over €4m in improvements to site conditions in 2020. The DHLGH continued to make funding available to local authorities for further improvements throughout 2021 to make conditions on sites safer, regardless of the official designation of the site.

Education

55. Actions to advance Traveller education outcomes form part of the NTRIS, taking a whole-of-government approach to improving the lives of Travellers and Roma in practical and tangible ways, including the aims of achieving equality of education outcomes, supporting an inclusive school community, and promoting a positive culture of respect and protection for the cultural identity of Travellers and Roma in education. A key objective of Traveller education policy in recent years has been the phasing out of segregated Traveller provision and the inclusion of Traveller children and young people in mainstream education.

56. Officials from the Department of Education, together with officials from the Department of Children, Equality, Disability, Integration and Youth, and the Department of Further and Higher Education, Research, Innovation and Science, engage with Traveller representative organisations as part of the NTRIS education subcommittee. This engagement will continue in the context of the development of the Traveller and Roma Education Strategy this year, in line with the Programme for Government commitment. A range of work currently underway in the area of Traveller education, both within and outside of the NTRIS framework, will inform the development of the Traveller and Roma Education Strategy. Examples of this work are detailed in paragraphs 57 to 65 below.
57. In 2019, the National Council for Curriculum and Assessment (NCCA) published a curriculum audit on Traveller history and culture.¹² The audit identified areas across the curriculum where teachers could teach about aspects of Traveller history and culture. The audit addressed the curriculum from Early Years, Primary and Post-Primary. Continuing its work on Traveller Culture and History in the curriculum, which follows the 2019 audit, the NCCA published its new research report¹³ in February 2023. The report was developed to advance the understanding of Traveller culture and history and to support learning and teaching across the curriculum. An Expert Group of Travellers and Traveller representatives reviewed and provided feedback on the report. The NCCA has also commenced its review of the primary and post-primary Intercultural Guidelines, and it is expected that the review will be completed this year.
58. The Delivering Equality of Opportunity in Schools (DEIS) programme is the Department of Education's main policy initiative to respond to educational disadvantage. The DEIS programme focuses on targeting additional resources to those schools included in the programme to ensure every child has an equal opportunity to achieve their potential. While only 20% of pupils overall attend DEIS schools, approximately 50% of Traveller children

¹²¹² *Traveller culture and history in the curriculum: a curriculum audit*, NCCA, 2019, available at <https://ncca.ie/en/resources/traveller-culture-and-history-in-the-curriculum-a-curriculum-audit/>

¹³ *Traveller culture and history research report*, NCCA, 2023, available at <https://ncca.ie/en/resources/traveller-culture-and-history-research-report/>

attend DEIS primary and post primary schools.¹⁴ Hence whilst acknowledging that not all Traveller pupils attend DEIS schools, where funding is provided to DEIS schools this means that a greater proportion of Traveller pupils benefit relative to the general population.

59. The Department of Education is funding a new DEIS and diversity post in the Professional Development Service for Teachers, who will co-ordinate the development and delivery of Continuing Professional Development (CPD) programmes for teachers in all schools (DEIS and non DEIS) to support social inclusion initiatives and meet education commitments under the relevant government strategies, current and emerging, and including NTRIS.
60. The refined DEIS identification model announced in March 2022 includes components to reflect the educational disadvantage experienced by students who have self-identified as Traveller or Roma. Following the expansion of the scheme, around 65% of Traveller pupils now avail of supports through the DEIS programme. The DEIS Plan includes reference to Travellers as a named group at risk of educational disadvantage, and includes specific actions in relation to Traveller and Roma education to promote improvements in school attendance and completion.
61. The NTRIS prioritised “investment in community-based support mechanisms to ensure greater retention of Traveller and Roma children and youths in the education system”. The NTRIS Pilot project *Supporting Travellers and Roma in Education* (STAR) was established to trial innovative approaches to improve education outcomes for Traveller and Roma pupils in four areas: Galway, Wexford, Dublin and Cork, across 59 schools. The pilot was developed as a cross-Departmental initiative of the Department of Education, the Department of Children, Equality, Disability, Integration and Youth, Tusla Education Support Services, along with Traveller representative organisations. The pilot teams – comprising of dedicated education workers, home school liaison officers and education welfare officers – work together with parents, children and young people, schools,

¹⁴ Traveller pupils have consistently attended primary schools with DEIS status more significantly than non-DEIS schools. The report *Pupils from the Traveller Community 2016 – 2020* notes that for the 2020-2021 academic year, 52% Traveller primary pupils and 48% Traveller post-primary pupils attended DEIS school. This report is available at [gov.ie - Primary and Post Primary Traveller Statistics 2016-20](https://www.gov.ie/en/publications-and-resources/publication/primary-and-post-primary-traveller-statistics-2016-20/) (www.gov.ie).

Traveller and Roma communities and service providers to remove the barriers impacting on Traveller and Roma children's attendance, participation and retention in education. Due to the impact of COVID-19, the pilot has been extended for a further 2 years, until end June 2024. The intention is that the pilot will inform the development of a sustainable programme to address the gap in educational outcomes for children and young people from the Traveller and Roma communities.

62. In line with the Programme for Government commitment, work as begun on the independent evaluation of the NTRIS STAR pilot project. A Research Advisory Group has been established to support the evaluation, and there is a Traveller representative on that Board. A baseline research report on the experiences of Traveller and Roma families within education entitled *Out of the Shadows – Traveller and Roma Education: Voices from The Communities*¹⁵ was commissioned at the outset of the project and published jointly by DCEDIY and the Department of Education in November 2021. It will provide a foundation for the evaluation of qualitative outcomes of the pilot.
63. The Department of Education received Dormant Accounts funding of over €1.3m for 2022 and 2023 to tackle education disadvantage for Traveller and Roma communities and to support attendance, participation and retention among Traveller and Roma learners. Initiatives under the Dormant Account funding include:
 - Funding 10 new Home School Community Liaison (HSCL) coordinators in 14 non-DEIS post-primary schools with high numbers of Traveller and Roma students. These HSCL coordinators have access to further funding, to implement and run initiatives to encourage improvements in school attendance, retention and progression for Traveller and Roma students.
 - Providing targeted supports to ensure the effectiveness of the HSCL role in working with Traveller and Roma families.
 - Allowing the creation of a new coordinator post with responsibilities across the four STAR pilot sites and for facilitating effective information-sharing between STAR teams and the 10 new HSCL coordinators.

¹⁵ *Out of the Shadows – Traveller and Roma Education: Voices from The Communities*, Dr Maria Quinlan, 2021, available at https://1d3ad8c0-4fe5-46e5-9b07-dc213044ac84.filesusr.com/ugd/5cfafe_0dc001ab34414419b855ebe82b7890f1.pdf

- Supporting Traveller and Roma learners as they transition from early learning and care settings to primary school, and from primary to post-primary school and onwards (Tusla Education Support Service (TESS) initiative).
64. In 2022 and 2023, DCEDIY secured €800,000 in Dormant Accounts funding for the employment of dedicated Education Community Development Workers who work in co-operation with local Traveller and Roma communities, primary and post-primary schools, and other service providers to improve educational outcomes for children and young people from the Traveller and Roma communities.
65. In line with NTRIS Action 18, the Department of Education commissioned research on the effectiveness of their anti-bullying procedures and guidelines on Traveller and Roma experiences in the school system. The development of *Cineáltas: Action Plan on Bullying* has been informed by an extensive consultation process, including the consultation of 170 children and young people with special educational needs, Traveller and Roma children, children from Ukraine and refugees. In December 2022, the Minister for Education launched *Cineáltas: Action Plan on Bullying*¹⁶ (see further reporting in paragraph 147). The *Anti-bullying procedures for Primary and Post Primary schools* are being reviewed and updated in parallel to *Cineáltas*, and will ensure that the a school's anti-bullying policy is developed and reviewed in consultation with the whole school community.
66. In May 2023, the Department of Education has published the report: *Pupils from the Traveller Community 2016 – 2020*¹⁷. While the data show continuing low levels of Traveller retention to Leaving Certificate compared to the national average, they also show increasing numbers participating in the Leaving Certificate cycle and some positive trends, in particular in relation to retention to Junior Certificate and enrolment at post-primary level. Some key points are:

¹⁶ *Cineáltas: Action Plan on Bullying*, December 2022, available at <https://www.gov.ie/en/publication/52aaf-cinealtas-action-plan-on-bullying/>

¹⁷ *Pupils from the Traveller Community 2016 – 2020*, May 2023, available at [gov.ie - Primary and Post Primary Traveller Statistics 2016-20 \(www.gov.ie\)](https://www.gov.ie/en/publication/52aaf-cinealtas-action-plan-on-bullying/). This report follows the earlier report: *Number of Pupils who are Members of the Traveller Community 2000/2001 - 2015/2016*, which is available at [cff76c5c868a41f2852cb9196962dc08.pdf \(www.gov.ie\)](https://www.gov.ie/en/publication/cff76c5c868a41f2852cb9196962dc08.pdf)

- 2020-2021: the highest recorded number of Traveller pupils in post-primary schools (3,292);
- 2020-2021: the highest number of Traveller pupils sat the Leaving Certificate programme (412).

The data show a steady increase in progression and retention in the Junior Cycle and increasing percentages of Traveller students sitting the Junior Certificate:

- 61.6% of the 2011 cohort completed the Junior Certificate examination. This increased to 69.3% for the 2014 cohort completing the Junior Certificate examination (+7.7%).

67. Actions of NTRIS aimed at improving education outcomes for all Travellers include promoting the Early Childcare and Education (ECE) pre-school scheme, as well as the Access and Inclusion Model (AIM) for Children with a Disability within the Traveller and Roma communities, in order to facilitate access for every child to free pre-school from the age of three until they start school. A new model to tackle the effects of disadvantage for children in Early Learning and Care and School Age Childcare settings is currently being developed with Traveller and Roma being recognised as a primary target in this model, among other target groups. Separately, a review is being undertaken of the ECE Programme, which offers up to two years of free pre-school education. One aim of the review, for completion in Q4 2023, is to identify potential barriers to participation by Traveller children and to address potential barriers.
68. The fourth National Access Plan *A Strategic Action Plan for Equity, Participation and Success in Higher Education 2022 – 2028*¹⁸ (NAP) was launched on 31 August 2022. The Plan seeks to target vulnerable students or students who have experienced disadvantage (including Traveller and Roma students) and therefore, face challenges in accessing higher education and experiencing belonging in higher education. For this National Access Plan, a goal will be set to increase the current number of Traveller new entrants in higher education, from 33 (2020/2021 academic year) to 150. It is intended to review this target over the lifetime of the Plan.

¹⁸ *National Access Plan: A Strategic Action Plan for Equity, Participation and Success in Higher Education 2022 – 2028*, available at <https://hea.ie/policy/access-policy/national-access-plan-2022-2028/>

69. In 2020, in line with NTRIS commitments to support access, participation and outcomes for Travellers and Roma in education, and as part of a COVID-19 response, the Minister for Further and Higher Education, Research, Innovation and Science provided ring-fenced funding of €300,000 under the dormant account fund to support Traveller progression to and retention in, higher education. The funding was increased to €450,000 in 2021 to support both Traveller and Roma students. A new three-year funding programme of €1.35m was announced under the *Programme for Access To Higher Education (PATH) Strand 5*¹⁹ in 2022. The PATH 5 initiative will provide for the continuation of the supports for Travellers and Roma with ring-fenced funding of €450,000 per annum over the three year period. The funding will support Traveller and Roma participation and progression in higher education and further develop community based partnerships.
70. During the COVID-19 public health emergency, the Department of Education engaged with Traveller Representative Bodies in relation to the digital divide while school buildings were closed. In 2020, as part of the €210m investment programme underpinning the implementation of the Digital Strategy for Schools, €100m in grant funding issued to schools to address their ICT needs. In the context of the COVID-19 public health crisis, schools were advised that this funding could be prioritised to assist schools in addressing ICT needs arising out of the Covid-19 environment, including the purchase of digital devices to loan to students and teachers, software, essential learning platforms and other ICT solutions as determined by the needs of the individual school and their learner requirements. This ICT Grant funding was issued to schools, as schools were best placed to identify the requirements of their student cohort and to meet those requirements. In response to closures, the Department of Education ran a summer

¹⁹ *Programme for Access To Higher Education (PATH) Strand 5*, available at <https://hea.ie/assets/uploads/2023/01/PATH-5-Principles-and-Objectives-FINAL.pdf>

programme, which was aimed at those who would have been most affected by the closure, which included Travellers and Roma.

Social Protection

71. The *Roadmap for Social Inclusion 2020–2025*²⁰ is the national strategy for poverty reduction and improved social inclusion. It established a Social Inclusion Roadmap Steering Group to monitor progress and oversee implementation, chaired by the Minister of State with responsibility for social inclusion. Progress on implementation of Roadmap commitments is reported with the annual publication of a progress report and report card displaying progress against each commitment and key metrics.
72. The Roadmap for Social Inclusion is a whole of Government strategy with the ambitious target to reduce consistent poverty to 2 per cent or less and make Ireland one of the most socially inclusive countries in the EU by 2025. The Roadmap translates this ambition into seven goals underpinned by 66 unique commitments to be taken to help deliver these goals. These unique commitments have been developed with relevant Departments, agencies and following consultation with advocacy and civil society groups. The Roadmap includes specific commitments to address different forms of poverty and assist marginalised groups.
73. In 2022, a Mid-Term Review of the Roadmap for Social Inclusion was undertaken. The purpose of the review was to evaluate progress in implementation, assess the Roadmap ambition, goals and commitments in the current environment, and examine the existing Roadmap indicators. All elements of the review have been informed by stakeholder engagement including a public consultation process. This will ensure that the Roadmap remains relevant to the poverty and social inclusion issues facing Irish society today, including in relation to the Traveller and Roma communities. The *Mid-Term Review of the Roadmap for Social Inclusion 2020-2025*²¹ and the submissions received during the public consultation process²² were published on 1 June 2023.

²⁰ Roadmap for Social Inclusion 2020–2025, available at

<https://www.gov.ie/pdf/?file=https://assets.gov.ie/46557/bf7011904ede4562b925f98b15c4f1b5.pdf#page=1>

²¹ *Mid-Term Review of the Roadmap for Social Inclusion 2020-2025*, June 2023, available at

<https://www.gov.ie/pdf/?file=https://assets.gov.ie/259391/5bcb78ff-a5fd-45db-9e6a-f187980f603c.pdf#page=null>

²² Mid-Term Review of the Roadmap for Social Inclusion 2020-2025 submissions, 2023, available at

<https://www.gov.ie/en/publication/6c351-mid-term-review-of-the-roadmap-for-social-inclusion-2020-2025-submissions/>

National Equality Data Strategy

74. The development of a new National Equality Data Strategy will act as an important element in creating the new suite of Equality Strategies, including the successor strategy to NTRIS, and will allow for better reporting against indicators and a greater focus on measurable outcomes. Specifically, the National Equality Data Strategy will provide guidance on the collection of equality data and how to identify and address gaps in data systems, while drawing on relevant guidance provided by the EU. It will provide a framework for developing and implementing an ethnic identifier which will enable Traveller access to, and participation in, public services to be tracked more accurately.
75. The main technical input for the National Equality Data Strategy is being provided by the Central Statistics Office, with policy support from the DCEDIY. A working group has been established which brings together a range of stakeholders from across Government, as well as civil society and research bodies. It is hoped to complete the Strategy by end Quarter 3, 2023, and that it will provide a general approach for identifying and filling current gaps in equality data, as well as developing standard practices in classification.

Combat the discrimination faced by persons belonging to the Traveller and Roma communities by both launching a joint national and local campaign raising general awareness of the level of discrimination they experience, and by developing specific awareness-raising programmes and training targeting the owners and staff of licensed premises in particular; develop a new action plan against racism with clear targets, indicators, timeframe and resources and effectively implement it.

76. The Government published the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 on 27 October 2022. One of the aims of this Bill – to “repeal the Prohibition of Incitement to Hated Act 1989 in its entirety and replace it with new, simpler provisions for incitement to hatred” – effectively addresses action 111 of the NTRIS: “The Department of Justice and Equality will review the Prohibition of Incitement to Hatred Act 1989 in the light of reports by civil society, international obligations and the experience of other jurisdictions, given the age of the legislation, the changes in Irish society and the use of the internet and social media since

its enactment to ensure that it is updated as necessary to respond to contemporary issues and the needs of our more diverse society”. The proposed new legislation will criminalise any intentional or reckless communication or behaviour that is likely to incite violence or hatred against a person or persons because they are associated with a protected characteristic. A number of key changes were made in the draft legislation since the General Scheme of the Bill was published in April 2021. The proposed legislation will also create new, aggravated forms of certain existing criminal offences, where those offences are motivated by prejudice against protected characteristics. It will include recognition of Traveller ethnicity in the main definitions in the new law.

77. The Department of Justice supports the development of competent, caring and efficient services to all victims of crime, including victims from the Traveller and Roma communities, by State Agencies and non-governmental organisations throughout the country. Among its key activities are:
- the use of the Victims Charter to achieve improved standards of treatment of victims by relevant State and voluntary sector organisations;
 - the launch and ongoing development of the Victims Charter website and the distributing of printed materials to public locations regarding the Victims of Crime Act 2017;
 - the promotion and awareness concerning the needs of victims of crime and the services available to them;
 - the publication of the Review of Protections for Vulnerable Witnesses in the Investigation and Prosecution of Sexual Offences (O’Malley Report);
 - the publication of the O’Malley implementation report *Supporting a Victim’s Journey: A plan to help victims and vulnerable witnesses in sexual violence cases*.
 - the recommendations offered to the Minister for Justice on victims’ issues in Ireland and on international developments pertinent to victims;
 - the implementation of specific Traveller and Roma community focused actions in the new Third Domestic, Sexual and Gender-based Violence (DSGBV) National Strategy launched in June 2022; and,
 - the work in co-operation with DSGBV and anti-human trafficking initiatives, the Criminal Legislation function and other relevant sections

of the Department of Justice to ensure a coordinated policy response to issues in relation to victims of crime by the Department.

An Garda Síochána

78. An Garda Síochána [Irish police service] has undertaken reforms to strengthen its capacity to respond to the needs of minorities. In October 2019, the Garda Síochána Diversity and Integration Strategy 2019-2021 was launched. The themes of the Strategy are focused on protecting the community, developing robust data systems, upskilling the police force to understand the needs of diverse communities and to respond to crimes perpetrated against them. The Strategy includes a working definition of hate crime, in line with international best practice, aimed at enhancing positive engagement with persons from minority groups and diverse backgrounds.
79. The Garda National Diversity and Integration Unit (GNDIU) monitors the reporting and recording of all forms of hate crime on PULSE, the Garda recording system. Hate Crime training is being delivered to all members of An Garda Síochána and dedicated Garda Diversity Officers throughout the country to prevent hate or racist crime, and to provide advice and assistance to any such victims.

National Action Plan Against Racism

80. The NTRIS contains specific actions that aim to combat racism and hate crime against minority groups in Ireland. A further initiative was the establishment of an independent Anti-Racism Committee to strengthen the Government's approach to combatting individual and institutional racism. The Committee, which included representation from Traveller groups, was tasked with building on the anti-racism actions included in the Migrant Integration Strategy and the NTRIS. Following an extensive public consultation, including engagement with international experts, the Committee submitted its *National Action Plan Against Racism*²³ (NAPAR) to the Minister for Children, Equality, Disability, Integration and Youth on 27 June 2022.

²³ *National Action Plan Against Racism*, 2023, available at <https://www.gov.ie/en/publication/14d79-national-action-plan-against-racism/>

81. The NAPAR was launched on 21 March 2023 and is intended to be implemented over a five-year period, from 2023 to the end of 2027. The Plan represents a national level, State-led, coordinated approach to eliminating racism in all its forms in Ireland. This includes racism against Travellers. An Independent Special Rapporteur on Racial Equality and Racism will be appointed later in 2023 who will independently monitor and report on progress towards the objectives of the Plan.

Public Sector Duty

82. The Public Sector Duty is a legal obligation on public bodies, contained in Section 42 of the Irish Human Rights and Equality Commission Act 2014, to have regard to the need to eliminate discrimination, promote equality of opportunity and protect the human rights of public sector staff and service users. To meet the core requirements of the Duty, public bodies must:
- Assess: a public body is required to set out in its strategic/corporate plan an assessment of the equality and human rights issues relevant to its purpose and functions, in a manner that is accessible to the public.
 - Address: a public body is required to set out in its strategic/corporate plan the policies, plans and actions to address issues raised in the equality and human rights assessment, in a manner that is accessible to the public.
 - Report: a public body is required to report annually on developments and achievements in respect of the equality and human rights issues and actions, in a manner accessible to the public, in its annual report.
83. The Irish Human Rights and Equality Commission (IHREC) has developed an eLearning module to support and enable staff within public bodies to understand and meet their obligations under the Public Sector Equality and Human Rights Duty (Public Sector Duty). The module is suitable for all staff, across all grades and functions²⁴.

Please see the reporting on the schools anti-Bullying study and the Yellow Flag initiative in Section III. Further measures taken to improve the implementation of the Framework Convention, paragraphs 146 to 148.

²⁴ Public Sector ELearning, IHREC, available at <https://www.ihrec.ie/elearning>

Improve access to justice for Irish Travellers by allowing access to a remedy ensuring that any potential victim of discrimination in “places of entertainment” has the same procedural guarantees as those provided by an anti-discrimination body

84. IHREC, Ireland’s Grade A Status National Human Rights Institution and National Equality Body, has the statutory remit to promote human rights and equality and to raise awareness of discrimination experienced by persons under the protected equality grounds, including members of the Traveller community. It undertakes regular awareness raising campaigns and initiatives on the provisions of the equality legislation²⁵.
85. IHREC has been given a range of powers to challenge discrimination, including against ethnic minorities, and to seek legal redress for persons experiencing discrimination. One of its functions under the 2014 Act is to encourage the development of a culture of respect for human rights, equality and intercultural understanding in the State. IHREC’s role of promoting intercultural understanding constitutes an additional mechanism, not only for promoting integration, but also for understanding the factors that can lead to discrimination against ethnic and racial minorities.
86. The Free Legal Aid Advice Centre (FLAC), an independent voluntary organisation that promotes equal access to justice for everybody, receives an annual contribution from the Department of Children, Equality, Disability, Integration and Youth to provide a Legal Advice Advocacy and Casework Service to the Roma Community. The service aims to support people from the Roma Community who experience inequality, discrimination, difficulties accessing services e.g. housing and social welfare. The Roma Legal Service operates by means of a referrals system involving organisations such as Crosscare and Cairde. In addition, since March 2020, FLAC has operated a dedicated Traveller Legal Service in cooperation with a Steering Group of representatives from the national Traveller organisations and supported by the Community Foundation of Ireland.

²⁵ [The Irish Human Rights and Equality Commission Act 2014 - IHREC - Irish Human Rights and Equality Commission](#), section 10, Functions of Commission.

Review of Equality Legislation

87. The legislative basis for the prohibition of discrimination is through the Equality Acts – the Employment Equality Acts and the Equal Status Acts – which prohibit discrimination across the nine equality grounds: gender, civil status, family status, sexual orientation, religion, age, disability, race, and membership of the Traveller community [with the addition of a 10th equality ground, housing assistance, in the Equal Status Act]. The legislation prohibits both direct and indirect discrimination in the areas of employment and access to goods and services, including housing, healthcare and education.
88. A review of the Equality Acts is currently being undertaken by the Minister for Children, Equality, Disability, Integration and Youth, which is examining the functioning of the Acts and their effectiveness in combatting discrimination and promoting equality. This includes a review of the existing equality legislation to consider whether or not the legislation remains effective in protecting persons against discrimination in employment, accommodation and access to goods and services.
89. In July 2021, the Minister launched a public consultation process as part of the review and invited written submissions in July – December 2021. The large number of submissions received were then analysed by the Research and Evaluation Unit in the Department of Children, Equality, Disability, Integration and Youth and a report outlining the findings will now be published in 2023. It is intended that legislative proposals arising from the review will be brought forward in 2023.

Review of the Civil Legal Aid Scheme

90. Action 119 of the NTRIS tasks the Department of Justice and Equality [now Department of Justice] to support a legal advice and advocacy service for Travellers and Roma. The Legal Aid Board is an independent, publicly funded statutory body responsible for the provision of civil legal aid and advice, family mediation and vulnerable witness related services. The Legal Aid Board's recently adopted Statement of Strategy commits the Board to improving the level of awareness of its services and also to addressing how it can meet the needs of persons and/or communities who may be marginalised or in danger of marginalisation. The Legal Aid Board is at the moment working with Free Legal Advice Centres (FLAC) to explore how it

can better support Travellers to vindicate their rights. As part of this, a solicitor has recently been seconded to a dedicated centre which will provide legal services to the Traveller Community. Additionally, staff training will be provided with the assistance of Traveller advocates and representatives, with input from FLAC.

91. It remains the case that the Social Welfare Appeals Office and the Workplace Relations Commission are not prescribed under Civil Legal Aid Act 1995 and thus the Legal Aid Board is unable to provide legal representation before those bodies. However, the Minister for Justice and her Department have now committed to a significant review of the civil legal aid scheme and in June 2022, she established the Civil Legal Aid Review Group to review the current operation of the Civil Legal Aid Scheme and to make recommendations for its future. It is anticipated that the issue of representation before the Social Welfare Appeals Office and the Workplace Relations Commission will be included in the scope of this review. The Group established to review the Scheme is made up of representatives from the Free Legal Advice Centre (FLAC), the Irish Traveller Movement, academics and researchers, legal professional representatives, officials from Government Departments and State Agencies.
92. On 8 December 2022, the Department of Justice launched a public consultation process on the review of the Civil Legal Aid Scheme and invited written submission from members of the public in relation to how their issues were resolved and, in particular, their experience of engaging with the Civil Legal Aid Scheme.

Support Travellers in their efforts to preserve and develop their identities and cultures, including nomadism; consult them on the possibility of creating a permanent cultural centre with sustainable public funding to collect and preserve the history, stories, legends, songs and identities of Travellers, including in the Cant language; review the legal provisions criminalising trespass; support the inclusion of Traveller culture and history in the curriculum taught in school

93. The first theme of NTRIS is that of cultural identity. It commits the Government to a series of actions to ensure that Traveller culture, heritage and identity is valued and respected in Irish society; that Travellers and Roma are supported to preserve and promote their cultural heritage and that inter-generational learning, cultural continuity and positive self-identity for Travellers and Roma should be facilitated. The importance of highlighting and promoting the positive cultural elements of the Traveller Community which can have an impact on many other areas of Traveller life is very much understood and work is being undertaken to ensure that each of these objectives is advanced under NTRIS.
94. The Department of Justice and Equality funded a major event on 15 March 2018 to celebrate the first anniversary of the recognition of Travellers as a distinct ethnic group. The celebratory event, held in the Royal Hospital Kilmainham, was open to Travellers and non-Travellers and drew on essential elements of Travellers' rich culture and heritage, including music, craft traditions and language. It also showcased community assets through its creative traditions in the photography, genealogy and social history collections of the National Museum of Country Life, the National Folklore Collection UCD and the National Library of Ireland.
95. Traveller Pride week is an annual event organised at national level by the National Traveller Pride Committee, currently comprising of 9 Traveller representative organisations. At the request of the Traveller Pride Steering Group, the Department funded a Review of Traveller Pride week local and National events. Stemming from recommendations contained in the review further €100k was allocated for 2021 events in line with the commitment under Action 1 of the NTRIS to "support, strengthen and expand Traveller Pride Week and increase national awareness of the event". Since 2021, the Department of Children, Equality, Disability, Integration and Youth

(DCEDIY) provides up to €100,000 each year to support the organisation of Traveller Pride Week. Additional funding is also being made available in 2023 to support the development of a digital media campaign to promote a wider public awareness of Traveller Pride week.

96. DCEDIY has worked to advance projects that increase the visibility of Traveller and Roma culture and heritage. In addition to its annual funding for Traveller Pride Week to empower national, regional and local organisations to celebrate Traveller culture and diversity, it also supports International Roma Day, which takes place annually. In addition, the Department:

- provides funding to a publishing company which works directly with Traveller authors to help them develop and publish literature related to Traveller culture and experience; this initiative aims to promote the inclusion of the Traveller community in the cultural life of Ireland;
- recently progressed a project with the National Museum of Ireland to bring greater visibility to its Traveller culture collections; this programme has seen the creation of an online portal of objects, archives, photography, recordings and other collections pertaining to Traveller culture and history, held in the National Cultural Institutions and National Folklore Archive illustrative; and,
- provides funding to Musicantia, a Roma Community led group of volunteer musicians and accredited music teachers who work in partnership with indigenous Irish and other migrant community development workers. Musicantia ensure that Roma and other young people gain high quality musicianship skills to sustain and promote the centuries old tradition of music, performance among Roma community in their adopted country of Ireland. This tradition of music performance assists the Roma and their neighbours to integrate more fully within local Dublin communities. They specifically aim to support Roma children, young people and their parents to contribute to their local communities through their skills in and passion for music. Musicantia promote a positive image of Roma community and foster good relations with others living in Dublin through organising integration activities.

97. In 2019, the Cant language was added to Ireland's National Inventory of Intangible Cultural Heritage, a list of living practices and customs that the

Irish government has agreed to protect, promote and celebrate under UNESCO's guidance. Ireland's National Inventory of Intangible Cultural Heritage is maintained by the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media as part of Ireland's obligations under the 2003 UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage.

Creative Ireland

98. In 2017, Creative Ireland was launched as an all-of-government culture and wellbeing programme committed to the vision that every person should have the opportunity to realise their full creative potential. The new Creative Ireland Programme 2023 – 2027 adopts a more targeted approach to social sustainability and a greater focus on equal opportunity, including membership of the Traveller and Roma communities. Under the new programme, Creative Ireland will work to support existing and successor policies (including the National Traveller and Roma Inclusion Strategy) and will focus efforts on research to underpin evidence-led policies, and the development and monitoring of targeted cultural and creative initiatives that enhance inclusion and visibility of marginalised groups.

School curriculum

99. In 2019, the National Council for Curriculum and Assessment (NCCA) published a curriculum audit on Traveller history and culture across early years, primary and post-primary (see paragraph 57 above). The audit identified areas across the curriculum where teachers could teach about aspects of Traveller history and culture.
100. The audit has provided the basis for further and ongoing work in this area. An expert advisory group was established by the NCCA to inform the work being carried out, with representatives and members of the Traveller community. A full-time education officer was appointed in September 2020 to progress the next steps, which include:
- identifying existing initiatives and supports across the three education sectors (early childhood, primary and post-primary) and exploring how they can be further enhanced, supported and possibly replicated;
 - identifying existing resources and materials and exploring the kinds of new support material and resources that need developing;

- working directly with early childhood settings and schools to identify good practice underpinned by principles of inclusion, intercultural education, and learning about Traveller history and culture.

101. As indicated in paragraph 57, in February 2023, the NCCA published the Traveller Culture and History research report, an important first step in responding to the findings of the curriculum report. The research report aims to provide an overview of what is currently known and has been recorded regarding the different aspects of Traveller culture and history. It will be used to inform the review and updating/redevelopment of curriculum specifications and the development of new specifications as part of ongoing work across sectors. It will provide a basis for the development of resources and materials for teachers/practitioners, and it will also inform thinking around intercultural approaches to education more broadly.

(b) Please make an assessment on any other core issues that remain outstanding after four monitoring cycles, and any obstacles encountered in addressing such issues.

102. There are no issues outstanding at the moment.

Section III. Further measures taken to improve the implementation of the Framework Convention

Please provide information on an article-by-article basis on measures taken to enhance the implementation of the Framework Convention. Indications on other policies, measures and needs assessments considered relevant in this context should also be provided. Particular attention should be paid to:

- (a) Measures taken to implement the recommendations included in Part 2 — "Further recommendations" of the Committee of Ministers' Resolution;
- (b) To the extent not already covered under points II and III.a. above, measures and policies adopted to implement all the detailed recommendations, the various findings and conclusions contained in the Advisory Committee's fourth Opinion.

States are encouraged to focus on up-to-date information on new developments since the submission of the fourth State report and to examine the impact in practice of the measures taken to date. States are also encouraged to provide information about any initiatives taken or considered beyond steps to implement the above recommendations, for example in response to or in anticipation of further new developments.

Article 3

Personal scope of application of the Framework Convention

Pursue efforts to acknowledge the place of Irish Travellers in Irish society and review, in this context, and in consultation with Traveller representatives, any legislative or policy changes required to guarantee persons belonging to the Traveller community the effective enjoyment of the rights guaranteed by the Framework Convention

103. The National Traveller and Roma Inclusion Strategy (NTRIS), launched in 2017, represents the Government's targeted approach to improve the lives of Travellers and Roma, ensure their fair participation in Irish life, and encourage much greater inclusion across all of Irish society. The Strategy encompasses ten main themes including Cultural Identity; Education; Employment; Health; and Accommodation with their associated specific and targeted actions. The Strategy was developed in close consultation with Traveller and Roma representative bodies, many of whom are

members of its Oversight Committee, chaired by the Minister for Children, Equality, Disability, Integration and Youth. The participation of Travellers and Roma is key to the Committee's work. NTRIS has been developed and is being implemented in a partnership approach with Traveller and Roma organisations so that their concerns are considered when national policy is being developed and so that collaborative responses can be put in place to address the challenges which remain to be addressed.

104. The review of NTRIS is currently underway and officials in the Department of Children, Equality, Disability, Integration and Youth are working closely with all stakeholders to review what has been achieved, and what new approaches need to be developed, particularly in terms of successful implementation and monitoring structures for the successor strategy.

Please see the reporting on the following measures in Section II. Measures taken to address core issues:

- Review of the NTRIS, which is ongoing: paragraphs 33 to 35.
- National Equality Data Strategy: paragraphs 74 and 75;
- Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022: paragraph 76;
- National Action Plan Against Racism (NAPAR): paragraphs 80 and 81; and,
- Review of Equality legislation and review of the Civil Legal Aid Scheme: paragraphs 87 to 92.

Data collection and population census

Adapt the new form of the next population census to allow voluntary and multiple self-identification as provided for in Article 3.1 of the Framework Convention; implement the relevant actions of the National Traveller and Roma Inclusion Strategy with regard to the collection of disaggregated data, by ethnicity and gender, in line with international data protection standards, and monitor such actions by the end of the implementation period of the Strategy; assess and analyse collected data periodically in close consultation with minority representatives in order to ensure that such data are duly complemented with information gathered through independent qualitative and quantitative research

105. One of the recommendations of the report *Roma In Ireland: a National Needs Assessment* was to “introduce a standardised ethnic identifier using the human rights framework in routine administrative systems and in the Census”. The Census Advisory Group on ethnicity held meetings in 2018 and 2019 to address the issue of expanding the ethnicity question in Census 2021 (delayed to 2022). The Advisory Group included representatives of the Irish Human Rights and Equality Commission (the national human rights body), Pavee Point (a national NGO representing the needs of Travellers and Roma) and other experts.
106. Their work resulted in the amendment to the ethnicity question included in the census in 2022. This change included ‘Roma’ as an individual category. A free text box allowed for other ethnic descriptions to be used, including for persons of mixed backgrounds. The 2022 census was the first to allow for identification of the Roma community as an ethnic group. The Traveller community have been separately identified in the national census since 2006.
107. A summary Census 2022 Report was published on 30 May, 2023 by the Central Statistics Office (CSO). Census 2022 highlights that the count of Irish Travellers increased by 6% to 32,949 since the last Census in 2016. It is also reported that Irish Travellers were generally younger than the general population. 16,059 of the population identified as Roma, and there were proportionately more people aged under 14 years and between 25 and 44 years who identified as Roma than in the general population. The CSO will

provide the Census 2022 Profile 5 - Diversity, Migration, Ethnicity, Irish Travellers & Religion report in Quarter 4, 2023.

108. NTRIS Actions 146 to 149 are included under the objective “Data disaggregated by ethnicity and gender should be collected across all Government Departments and statutory agencies to monitor and evaluate policies and strategies and to support evidence-based policy making”. A number of Departments and State Agencies are already collecting disaggregated data, by ethnicity and gender, in line with the international data protection standards. These include, but are not limited to :
- The Department of Housing, Local Government and Heritage: effective from March 2022, an ethnic identifier is now included on the social housing support application form and will allow for more evidence-based planning for Traveller-specific accommodation and support the Traveller Accommodation Programmes.
 - The Department of Education introduced an ethnic identifier in their Primary Online Database (POD) in 2016 and also collects an ethnic identifier on their Post-Primary Online Database (P-POD). The Higher Education Authority publishes regular reports on diverse aspects of access to higher education and the barriers experienced by different groups.
 - Pobal introduced an ethnic identifier in their Social Inclusion and Community Activation Programme (SICAP) monitoring system in January 2015. Other public bodies collecting ethnic data include the National Drug Treatment Reporting System (NDTRS) and the Health Protection Surveillance Centre (HPSC).
109. An ethnic identifier for self-identifying as a member of the Traveller community in the Irish Prison System (IPS) is in place since 2018. In 2020, the IPS employed a data specialist to develop reporting capability, including in relation to the ethnic identifier. The IPS has developed a 2nd point of data capture for the ethnic identifier within the Integrated Sentence Management (ISM) process, which was introduced in July 2021. The IPS is working with Pavee Point to develop and deliver training to ISM Coordinators to support this additional means of collecting data.
110. The Central Statistics Office (CSO) has developed initiatives to improve data dissemination. The CSO Databank is a key data source derived from

population censuses and administrative databases, with options for cross-tabulation and disaggregation across policy domains. An open data portal was established with a growing amount of public sector data.

Equality Data Audit

111. The Equality Data Audit 2020²⁶ is an initiative from the CSO to bring awareness of the available data related to equality and also highlight gaps in the data. The equality data audit improved the availability of data disaggregated by equality dimensions, including the potential for using unique identifiers to match data with the necessary safeguards and to carry out cross-analysis of data.
112. The work by the CSO on an Equality Data Audit was prompted by the *Guidelines on improving the Collection and use of Equality Data*²⁷ published by the European Commission's Subgroup on Equality Data in 2018 and also by the requirement of the Equality Budgeting Group in the Department of Public Expenditure and Reform to know about the availability of equality data. The Equality Data Audit involved reaching out to public sector bodies and requesting them to fill out an audit template. The returned audits were then collated and reviewed. Some analysis was then completed, highlighting areas where there is a large variety of data sets available, such as age and gender and also areas where there is a lack of data collected, such as ethnicity or race. The Equality Data Audit is planned to be a document that will be periodically updated. The report describes the results and recommendations of the audit.
113. As stated in paragraph 74, the development of a National Equality Data Strategy (announced on 21 March 2022) will act as an important element in creating a new suite of Equality Strategies, with a focus on measurable impacts. It will provide guidance on the collection of equality data and how to identify and address gaps. The strategy will also direct the user to standard practice in classification, and will draw on relevant guidance provided by the EU. Representatives of Traveller organisations are on the Working Group and very active in providing input.

²⁶ *Equality Data Audit 2020*, available at <https://www.cso.ie/en/methods/methodologicalresearch/rp-eda/equalitydataaudit2020/dataissuesandrecommendations/>

²⁷ *Guidelines on improving the Collection and use of Equality Data*, July 2028, available at https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combating-discrimination/equality-data-collection_en

Article 4

Traveller and Roma women and girls

Collect relevant disaggregated data to address discrimination issues regarding Traveller and Roma women and girls; adopt an implementation plan with clear targets, indicators, timeframes and resources and implement both the National Traveller and Roma and Inclusion Strategy and the new National Women Strategy in a coordinated and consistent way; monitor the measures taken and evaluate them to ensure that they address their respective objectives with regard to Traveller and Roma women and girls

114. The *National Strategy for Women and Girls 2017-2020: creating a better society for all*²⁸ (NSWG) launched in 2017, provides a whole of Government policy framework to improve outcomes for women and girls. All departments have been tasked under action 6.13 to identify knowledge gaps in relation to gender equality and to use this as a base to drive improvements in the data infrastructure and analysis required to close these gaps. Traveller and Roma women and girls are explicitly referenced in five of the 139 actions of that Strategy relating to access to education, training and employment opportunities, health outcomes, and participation in public life, communities and in leadership positions. The NSWG is directly aligned to NTRIS. As of 2019, all organisations in receipt of the Department of Children, Equality, Disability, Integration and Youth funding are now contractually obliged to provide progress reports which include recording data on male/female participation as outlined in 6.11 of the NSWG.
115. The Government has committed to develop and implement a new National Strategy for Women and Girls, in addition to reviewing the Migrant Integration Strategy and the National Traveller and Roma Inclusion Strategy (NTRIS), and ensuring that the successor strategy has a stronger outcomes focused approach. While initially due to conclude in 2020, and 2021 in the case of the NTRIS, these strategies were extended in recognition of the impact of the COVID-19 pandemic on their implementation.

²⁸ *National Strategy for Women and Girls 2017-2020: creating a better society for all*, April 2017, available at <https://www.gov.ie/pdf/?file=https://assets.gov.ie/95975/bd524a60-e19f-44e8-80ce-9cdc58853403.pdf#page=null>

Please see the reporting on the Review of NTRIS in Section II. Measures taken to address core issues, paragraphs 33 to 35.

Please see the reporting on the National Equality Data Strategy in Section II. Measures taken to address core issues, paragraphs 74 and 75.

In line with NTRIS Actions under the “Gender Equality” objective, the DCEDIY provides targeted supports to facilitate Traveller and Roma women’s engagement in key areas including education, employment and economic development. Funding is provided to the National Traveller Women’s Forum, Cairde and Waterford Area Partnership to support and progress Traveller and Roma women’s inclusion and equality in Irish society.

National Traveller Women’s Forum (NTWF)

116. Annual funding is provided to the National Traveller Women’s Forum (NTWF) organisation, which are working to empower Traveller women 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 and achieve full inclusion and equality in Irish society.
117. NTWF are engaged in a range of policy fora at national and international level to ensure that the needs, concerns, and issues affecting Traveller women are addressed in a meaningful way. As part of their commitment to progress key equality and human rights for Traveller women, NTWF are engaged in collaborative dialogue with key decision makers and legislators and are represented on a number of committees such as (this list is not exhaustive):
 - The National Traveller and Roma Inclusion Strategy Steering Group and its Education and Employment Sub-Committees;
 - the Strategy Committee for the National Strategy for Women and Girls;
 - the National Traveller Accommodation Consultative Committee; and,
 - the Steering Committee to Review the Department of Education’s Action Plan on Bullying.

Please see the reporting on funding provided to the NTWF in Section III. Further measures taken to improve the implementation of the Framework

Convention, under Article 15, Participation in public affairs section, paragraphs 165 to 168.

Cairde's Roma Education Project

118. In 2023, for the second consecutive year, the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) is providing Dormant Account funding to Cairde to continue their Roma Education Programme project established in 2022 as a continuation of Cairde's Roma Women's Advocates Project, funded by the Department of Children, Equality, Disability, Integration and Youth in 2021. The Roma Education Programme specifically targets adult members of the Roma community (mostly women) who did not have the opportunity to attend school regularly when they were children.
119. This online initiative supports Roma to build their everyday reading, writing, and numeracy skills and aims to empower Roma women in their interactions with employers, health services, and statutory bodies. The programme is run completely online and consists of English language and literacy classes, computer classes, and classes that focus on health topics, and social issues. The female participants also have the option to attend a weekly yoga and mindfulness class.
120. This programme is the only programme for Roma in Ireland that operates online, and the only dedicated education programme specifically designed for, and with, Roma in the country. Because of the fact that it is run online, the programme has become an inclusive space for the participants, all of whom are parents, and many single mothers. The majority of the participants are also living in emergency accommodation. The high attendance rate and dedication to the classes may be attributed to the flexibility and convenience of online classes. Additionally, online classes were a safer option to minimise the risk of potential transmission of COVID-19 while also alleviating childcare issues for participants with young children who are not usually able to attend in-person classes. Prior to engaging with the project, the participants had limited or no experience with computers but now are extremely confident using Zoom, email and other programmes. An external evaluation on the merits and areas for improvement of the programme has recently been completed.

Waterford Area Partnership (WAP)'s Atelier Roma Women's Programme

121. The Atelier Roma Women's initiative aims to engage Roma women through training and development programmes to support access to education and employment.
122. During the COVID-19 restrictions period, food parcels were delivered on a weekly basis to Roma families in dire need – mainly Roma families newly arrived in Waterford, with no income or support. The outreach work during that time also actively engaged women from the Roma community with weekly programmes and activities to address social isolation, language barriers and health issues, and to increase Roma women's wellbeing and self-confidence.

Article 5

Support for the preservation and development of the Irish Travellers' identities and cultures

Review the existing modalities for providing support to Traveller cultural projects, in particular with a view to ensuring the availability of institutional funding and Travellers' continuous and sustained presence in Ireland's cultural life

123. DCEDIY, in line with its commitments under the NTRIS, works to support and advance projects that increase the visibility and national awareness of Traveller and Roma culture and heritage. The Department provides annual funding for Traveller Pride Week to empower national, regional and local organisations to celebrate Traveller culture and diversity, and for International Roma Day, which takes place annually. In addition, DCEDIY funds a centrally organised Traveller Pride Awards, which offers an important showcase for Traveller culture.
124. Ireland's embassies abroad also promote Traveller cultural projects in their work. As an example, for many years, the Embassy of Ireland in London has played an important role in celebrating Irish Traveller culture in the UK through high profile events and related public diplomacy activities. Ireland's Ambassador in London hosted the February 2022 Friends, Families and Travellers Awards ceremony, for instance, at the Embassy.

Please see the reporting on funding provided to Traveller organisations to undertake projects to promote and celebrate Traveller culture, and reporting on Creative Ireland in Section II. Measures taken to address core issues, paragraphs 96 and 98 respectively.

Article 6

Combating hate speech and hate crime

Support the adoption of bespoke legislation on hate crime, in line with ECRI General Recommendation No. 15 on combating hate speech; improve the data collection system in this regard; consider monitoring hate speech in broadcast media as well as online in order to be able to further determine the nature and scope of the phenomenon and to address it, possibly as part of a new national strategy against racism; establish a mechanism responsible for monitoring social media as such

125. The NTRIS has specific actions on combatting discrimination and ensuring equality for the members of the Traveller and Roma communities, and one of the objective of the Strategy is the implementation of “robust measures to address racism and hate speech in the mainstream media and public sphere”. Ireland is taking action to strengthen legal provisions to address hate crime and new legislation to combat hate crime and hate speech is expected to become law before year end. The Government published the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 on 27 October 2022. The new legislation will criminalise any intentional or reckless communication or behaviour that is likely to incite violence or hatred against a person or persons because they are associated with a protected characteristic. A number of key changes were made in the draft legislation since the General Scheme of the Bill was published in April 2021.
126. The Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 was published on 27 October, 2022 and is currently progressing through the Oireachtas. The provisions of the new legislation have been crafted to ensure that they will capture hate speech deemed criminal in an online context. There has also been significant engagement between officials in the Department of Justice and the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media to ensure that the provisions dovetail with the regulatory framework for online safety set out in the

Online Safety and Media Act 2022. That Act will link with these provisions on incitement to hatred and ensure, particularly in a social media environment, that designated online services take appropriate systemic measures to manage the availability of hate speech on their platforms.

127. On 15 March, 2023, the Online Safety and Media Regulation Act 2022 was commenced and a new multi-person media commission (to be known as Coimisiún na Meán) was formally established. This new regulator will, among other things, apply binding online safety codes to designated online services with the aim of minimising the availability of some of the most serious forms of harmful online content, including hate speech. The regulator will also complete the transposition of the EU's revised Audiovisual Media Services Directive into Irish law, including by providing for online safety through the regulation of video-sharing platform services under Ireland's jurisdiction.
128. As previously indicated in paragraphs 87 to 89, the Government is undertaking a review of existing equality legislation to consider whether or not the legislation remains effective in protecting people against discrimination in employment, accommodation and access to goods and services. It will examine the degree to which those experiencing discrimination are aware of the legislation and whether there are practical or other obstacles which preclude or deter them from taking an action.
129. The National Action Plan Against Racism (NAPAR) addresses the spread of racist hate content online. Objective 3 aims to target racism in media representation and remove "barriers to minority ethnic people accessing leadership roles, including through positive measures." Action 3.3 provides for "taking steps to ensure that measures to eliminate the dissemination of hate speech online are effective and have regard to the local context in Ireland."
130. The Department of Foreign Affairs has engaged in relation to incidents of discrimination against Travellers in the UK. The Irish Embassy in London has often played a supportive role in such cases. Minister of State Colm Brophy issued a public statement in March 2021, in response to a high profile case of discrimination. This statement both welcomed the UK's Equality and Human Rights Commission's response to discriminatory practices by a

holiday park business to exclude Travellers and condemned the use of any discriminatory practices by such companies.

Please see the reporting on the information related to the data collection system and the Garda National Diversity and Integration Unit (GNDIU) in Section II. Measures taken to address core issues, paragraphs 74 and 75 and paragraph 79 respectively.

Law enforcement authorities (An Garda Síochána)

Further support the work of the Garda Bureau of Community Diversity and Integration, as well as of the Police and Garda Síochána Ombudsman Commission; recruit and retain a more ethnically and culturally diverse police service to further address any mistrust in the police force; amend Garda Síochána (Discipline) Regulations 2007 in order to explicitly specify that discrimination constitutes a breach of discipline

131. An Garda Síochána has undertaken reforms to strengthen its capacity to respond to the needs of minorities. In October 2019, the Garda Síochána Diversity and Integration Strategy 2019-2021 was launched. The themes of the Strategy are focused on protecting the community, developing robust data systems, upskilling the police force to understand the needs of diverse communities and to respond to crimes perpetrated against them. The Strategy includes a working definition of hate crime, in line with international best practice, aimed at enhancing positive engagement with persons from minority groups and diverse backgrounds.
132. The Equality, Diversity and Inclusion Strategy 2021-2022 of An Garda Síochána outlines the organisation's commitment to attract, develop and retain a diverse workforce in order to better reflect the diversity of Irish society and to learn from multiple perspectives and experiences. The Garda Internship programme is part of An Garda Síochána's Equality Diversity and Inclusion Strategy Statement and Action Plan 2020 – 2021. An Garda Síochána has launched the second year of its Diversity Internship Programme, which aims to increase the accessibility, understanding of, and potential for a career in An Garda Síochána for school-leavers and graduates, particularly those from groups typically underrepresented in the organisation. To be eligible for this internship, candidates have to identify as belonging to a group recognised as facing a greater risk of inequality or

social exclusion in Irish society. Members of the Traveller and Roma communities are one of the target groups.

133. Following a full independent review of Garda Diversity Training in January 2020, a new organisational approach to training has been developed and is currently being delivered. The training programme will increase Garda confidence in dealing with reports of racially motivated and Hate Crimes. The new bespoke online training programme was developed in conjunction with community representatives and Civil Society Organisations who have contributed valuable content to the programme. This has provided a welcome opportunity for diverse and minority groups to inform Garda training, ensuring the policing needs of all communities are addressed. The programme includes:
- Online Hate Crime Training (delivered in 2022)
 - Online Diversity and Cultural Awareness Training (to be delivered 2023)
 - Online Leadership in Diversity in Policing Training (delivered in 2022)
134. The new training contains submissions from representatives from all diverse and minority groups to ensure Gardaí gain a greater understanding of the impact of racism and Hate Crimes on them individually and collectively as a community. In addition to providing guidance and support in recording, investigating and prosecuting Hate Crime, the training is also aimed at ensuring all Gardaí are equipped with the skills and confidence to interact positively with migrants and marginalised communities, and reduce opportunities for disaffection and radicalisation.
135. To increase confidence and provide support and guidance to Garda members in providing an efficient response to Hate Crime, policy, procedures, information sheet and aide memoire have been adopted and published to the Garda organisation. Bespoke training and guidance has been developed for call takers in the Garda Services Information Service (GISC) to ensure all Hate Crimes and Incidents are recorded to the highest standard. The availability of reliable data is essential for resource allocation, identification of trends, crime hotspots, repeat offending and repeat victimisation.

Article 10

Use of languages

Develop and implement a plan to revitalise the Cant language and in this respect support the production of any type of media content in the Cant language, in order to allow its transmission to, and popularisation among, younger generation

136. The NTRIS aims to support Traveller culture, identity and heritage and ensure that it is valued within Irish society. Support is provided for national and local Traveller organisations whose remit covers the promotion of Traveller culture including the promotion of the language. Some of the events held for the annual Traveller Pride Week, funded by DCEDIY, have a focus on language.
137. As previously indicated, the Cant language was added to Ireland's National Inventory of Intangible Cultural Heritage in 2019 - a list of living practices and customs that the Irish government has agreed to protect, promote and celebrate under UNESCO's guidance. Ireland's National Inventory of Intangible Cultural Heritage is maintained by the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media, as part of Ireland's obligations under the 2003 UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage.
138. As mentioned in paragraph 57, the research report on Traveller culture and history published in February 2023 by the NCCA explores the research on the language of Irish Travellers and its usage in Ireland today. The report notes that Cant/Gammon is spoken by Travellers, to varying degrees, in Ireland, as well as in the UK and in parts of the USA, but that "sadly, the use of Cant/Gammon has diminished greatly over the years and lot of Cant/Gammon vocabulary has been lost ...".
139. The report concludes that Travellers must decide how they want the language developed or passed on so that it can continue to be a part of their self-identity, and asks whether the time now is right for Travellers to engage in a more comprehensive debate on the future of their language.

Article 12

Education of Travellers and intercultural education

Adopt, in consultation with representatives of Traveller and Roma parents and organisations, a coherent Traveller and Roma Education Strategy and an implementation plan with clear targets, indicators, timeframes and resources; implement it and evaluate the measures taken at the earliest opportunity

140. There is a commitment in the Programme for Government (2020) to the development of a Traveller Education Strategy. Officials from the Department of Children, Equality, Disability, Integration and Youth, the Department of Further and Higher Education, Research, Innovation and Science and the Department of Education engage with Traveller representative organisations as part of the NTRIS Education Sub-committee. This engagement will continue in the context of the development of the Traveller and Roma Education Strategy. As outlined earlier in this report, a range of work currently underway will inform the development of a Traveller and Roma Education Strategy.

Please see the reporting on the Traveller and Roma Education Strategy in Section II. Measures taken to address core issues, paragraphs 56 to 65.

The Advisory Committee also calls on the authorities to support the inclusion of Traveller culture and history in the curriculum taught in school, and to further promote and enhance an inclusive school environment for Traveller students in order to combat discrimination

141. The NTRIS includes comprehensive and coherent education objectives which support the Department of Education in progressing Traveller and Roma education initiatives. The Department of Education is supportive of measures to improve educational outcomes for Travellers, which includes ensuring safe and supportive environments in schools that are welcoming and inclusive for every student. Developing knowledge and understanding of Traveller culture and history in schools will help to build a recognition of the important value of Traveller culture and history and help to improve a sense of belonging for Traveller children in schools.

142. The NCCA has commenced work to update its Intercultural Guidelines for schools. These identify the ways in which intercultural education can be

integrated into the curriculum. The aim of the guidelines is to contribute to the development of Ireland as an intercultural society through the development that a shared sense of language, culture and ethnic diversity is valuable. NCCA work on updating these guidelines will support the further integration of intercultural education in the curriculum.

Please see the reporting on the school curriculum in Section II. Measures taken to address core issues, paragraphs 99 to 101.

143. The Department of Education's Wellbeing Policy and Framework for practice has given recognition to the importance of promoting wellbeing in education. The approach set out in the Wellbeing Policy is a whole school and preventative approach, which has multiple components that include providing children and young people with opportunities to build core social and emotional skills and competencies, experience supportive relationships within the school setting and be part of a school environment and culture that feels both physically and psychologically safe.
144. Aligned with the policy, a number of supports are currently being offered to schools to support wellbeing and mental health, including training offered to schools by the Professional Development Service for Teachers (PDST) to ensure that the promotion of wellbeing will be at the core of the ethos of every school, and training for school staff by the National Educational Psychological Service (NEPS) on the promotion of wellbeing and resilience in schools.
145. The Education (Admission to Schools) Act 2018 provides an equitable, consistent and transparent approach to how school admissions policies operate for all primary and post-primary schools:
 - Parents have the right to choose which school to apply to, and where the school has places available for the relevant year, the pupil/student should be admitted. However, in schools where there are more applicants than places available, a selection process will be necessary. This selection process and the enrolment policy on which it is based must be non-discriminatory and must be applied fairly in respect of all applicants.
 - Schools must include an admission statement in its admission policy stating that the school will not discriminate in its admission on any of

the nine grounds specified in the Equal Status Act 2000: gender, marital status, family status, age, disability, sexual orientation, race, religion, and membership of the Traveller community.

- Schools must apply the criteria listed in the schools' admissions policy when processing enrolment applications.

146. As part of its NTRIS commitments, the Department of Education commissioned research on the effectiveness of their anti-bullying procedures for primary and post-primary schools, based on Traveller and Roma pupils' experiences. The report *A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system*²⁹ was published in March 2022. The report found evidence of good practice with respect to preventing and addressing bullying and it made a series of recommendations to improve the school experience of Traveller and Roma pupils, including on bullying procedures, anti-racism training, and promoting a positive school culture, respect, belonging and inclusion.

147. The research has fed into the Department of Education's *Cineáltas: Action Plan on Bullying*, which was launched by the Minister on 1 December 2022, and will feed into the Department's work on reviewing and revising anti-bullying procedures for schools. The Steering Committee for the Action Plan included a Traveller organisation representative, and development of the plan involved wide-ranging consultation, which involved public consultation and consultation with 170 children and young people, including Traveller and Roma children. The actions in *Cineáltas* include a focus on creating an inclusive school culture and environment, provision of support for schools, training for all school staff including boards of management, research and awareness raising hoping to build strong relationships and partnerships between the whole school community, and aims to ensure that all forms of bullying including identity-based bullying are being addressed. Commitments in *Cineáltas* include the continuation

²⁹ *A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system*, Dr. Maeve Dupont, DCU Anti-Bullying Centre, March 2022, available at <https://antibullyingcentre.ie/wp-content/uploads/2022/03/A-study-into-the-effectiveness-of-the-Anti-Bullying-Procedures-on-Traveller-and-Roma-pupils-experiences-in-the-school-system.pdf>

of the NCCA's work on Traveller Culture and History in the curriculum, and the establishment of a dedicated unit to promote the voice of children and young people and to ensure that they have meaningful input into the development of Department policy. The *Cineáltas Implementation Plan 2023-2027*³⁰ was launched in April 2023. The implementation plan sets out the commitment to implementing each of the 61 actions contained in Cineáltas within a 5 year period and sets out timeframes and information about how the actions will be implemented.

148. The Department of Children, Equality, Disability, Integration and Youth also supports the Yellow Flag Programme, through the EU's Asylum, Migration and Integration Fund (AMIF). This is a whole school initiative which supports schools to celebrate diversity, promote inclusion and challenge racism. The Yellow Flag Programme was established by the Irish Traveller Movement in 2009 to support inclusion and inter-culturalism within schools. By end 2021, over 100 schools had been awarded the Yellow Flag, which includes 41,000+ students, from 83 countries and c.3,300 teachers.

Article 15

Economic life

The Advisory Committee urges the Irish authorities to adopt an implementation plan with clear targets, indicators, timeframe and resources and to implement employment and economic measures listed in the National Traveller and Roma Inclusion Strategy without delay. Such implementation should be completed by the end of the implementation period of the Strategy and the measures taken should be monitored to ensure they address their respective objectives, in particular with regard to women

149. The NTRIS is the national policy framework of actions designed to improve economic and employment opportunities of the Traveller and Roma communities in Ireland. One of the ten thematic areas in the Strategy focuses on employment and the Traveller economy.
150. The NTRIS Employment Subgroup was established in September 2018 to increase the focus on the 17 employment-related actions in the NTRIS and

³⁰ *Cineáltas Implementation Plan 2023-2027*, April 2023, available at <https://www.gov.ie/en/publication/52aaf-cinealtas-action-plan-on-bullying/>

to address the extensive barriers and challenges that impact on employment of Travellers and Roma. The membership consists of representatives of the Traveller and Roma communities, as well as relevant Government Departments and State Agencies, Traveller organisations, unions, employer bodies, philanthropic body, and the private sector. The Subgroup is currently chaired by the Department of Social Protection.

151. The NTRIS Employment Subgroup monitors progress in the offer of internships for Traveller and Roma in public service employment, which is an action under the NTRIS. It also advises the Department of Social Protection on the Pathways to Work Strategy and on how to engage more effectively with the Traveller and Roma communities.
152. DCEDIY provides annual funding for the Special Initiative for Travellers (SIT), an initiative focussing on 7 locations nationwide with a view to coaching and assisting Travellers wishing to enter employment. The SIT provide support for practical approaches to redressing the imbalance in Traveller under-employment, to support Travellers already engaged in the Traveller economy and provide other supports, including training, to address the needs of Travellers. In 2022, €410,800 was allocated to the SIT organisations around the country who directly manage, support, and assist with Traveller training and employment. Separately, in 2022 additional funding of €427,386 was allocated to support six Roma employment initiatives.
153. Ireland's Department of Social Protection (DSP) employment related actions in the NTRIS reflect commitments in the Government's Pathways to Work Strategy 2016-2020, which sought to ensure that as many job opportunities as possible are filled by people who are unemployed and face disadvantage in accessing the labour market.
154. In line with the objectives and actions set in the Pathways to Work Strategy 2021-2025, the Irish Government commits to deliver and support a range of assistive and targeted measures to increase employment, training and apprenticeship opportunities for Travellers and Roma by:
 - reserving places on public employment programmes for people from disadvantaged and minority backgrounds;
 - developing a Traveller and Roma Training, Employment and Enterprise Plan;

- exploring the feasibility of introducing Traveller (and/or Roma)-specific Group Information Sessions over the lifetime of the strategy;
- engaging with community representative bodies to produce Traveller (and/or Roma) specific employment service engagement tools;
- consulting with stakeholders from the Traveller (and/or Roma) community to advise the Public Employment Service;
- implementing the Public Appointments Service Equality, Diversity and Inclusion Strategy 2021-2023, including by supporting engagement with representative organisations and individuals from diverse backgrounds to understand employment barriers and to awareness of public sector employment opportunities among these individuals;
- considering making the higher level of the JobsPlus subsidy available to all employers who recruit an unemployed person of Traveller or Roma ethnicity;
- further developing specific Community Employment schemes for Travellers and Roma;
- delivering a bursary programme, as set out in the Action Plan for Apprenticeship 2021-2025, to fund up to 100 apprentices per annum who are experiencing socio-economic disadvantage and who are from target groups, including lone parents, people with disabilities, Travellers and Roma.

155. The Department of Social Protection continues to fund community development projects under the Community Employment (CE) scheme with the stated aim of providing specific employment opportunities for Travellers and Roma. Traveller and Roma clients also participate in other mainstream Community Employment projects. The CE entry criteria for Traveller and Roma candidates are more flexible than the general population eligibility criteria. The minimum entry age is set at 18 (instead of 21) and Traveller or Roma jobseeker clients only need to be in receipt of payment for one week compared to 12 months to qualify for the Community Employment Programme in general.

140. The Pathways to Work strategy also recognises the very key role that employers have in providing access to the labour market, and that financial incentives are beneficial to encouraging employers to take on those who are under-represented in the labour market. Budget 2023 has enabled access to the higher level of JobsPlus, which is of a value of €10,000 over 2

years, to employers who recruit a jobseeker who is of Traveller or Roma ethnicity. In addition, significant consultation has taken place with Traveller and Roma organisations in terms of identifying ways to improve both engagement with the public employment services and employment outcomes for those participating in State employment programmes through the development of a Traveller and Roma Employment Services Consultative Forum.

156. The Social Inclusion and Community Activation Programme (SICAP) is the Government's primary social inclusion programme, and is very firmly rooted in the pre-employment space. It works to support disadvantaged communities, unemployed people, and communities such as Traveller and Roma. The programme has dealt with over 308 individuals who identified as Traveller or Roma. Of the 308 individuals, 128 progressed into employment (part and full time) with 67 becoming self-employed. The Department of Rural and Community Development (DRCD) are currently consulting with all target groups on the future development of the SICAP, through focus group meetings and workshop events. Traveller representative bodies such as ITM and Pavee Point have been invited to contribute to these focus groups.
157. DRCD has recently announced (March 2023) a new call for applications under the Community Services Programme, which currently supports over 420 community-based organisations. The purpose of this funding is to support social enterprises and community/voluntary organisations with an additional strand focusing on circular economy projects that are either Traveller led or ones that will primarily employ members of the Traveller community. Funding of €1 million will be available for this new call in 2023.

The Advisory Committee invites the authorities to further analyse the impact of childcare costs on women's access to the labour market and further education, and, based on that analysis, to envisage adapted measures to circumvent the barrier they may represent

158. Under NTRIS Action 100, the Department of Children and Youth Affairs [now DCEDIY] commits, through a Single Affordable Childcare Scheme, to "support the provision of accessible and affordable childcare to facilitate Traveller and Roma women's engagement in education and the labour market". The National Childcare Scheme (NCS) opened to online

applications in November 2019. The NCS was designed on the principle of progressive universalism, ensuring that families on the lowest incomes receive the greatest level of support. The Scheme represents a fundamental shift away from subsidies grounded in social protection entitlements, and towards a comprehensive and progressive system based on universal and income-based subsidies.

159. In preparation for the Scheme's introduction, a range of communications activities were undertaken to build awareness of the Scheme, with a particular focus on supporting the participation of disadvantaged groups, including Traveller and Roma families. A comprehensive Communications and Engagement Strategy was completed for the launch of the NCS as well as a Training Implementation Plan, both of which are mindful of the needs of under-represented groups such as Traveller and Roma. Members of the NCS Communications Team held meetings with representatives from Traveller/Roma advocacy groups to assess the training and communications needs of these communities. Dialogue is continuing beyond the launch of the Scheme to explore avenues of cooperation for mutual benefit.
160. According to the Pobal Annual Early Years Sector Profile, services reported 1,866 Traveller children and 507 Roma children attending early learning and childcare services in the 2020/21 programme year.
161. Following Budget 2022 and Budget 2023, three significant reforms have been introduced to the operation of the NCS:
 - the first change has removed the practice of deducting hours spent in pre-school, or school, from NCS awards. This means that all eligible children can have some access to early learning and childcare throughout the year. With this reform, hours spent in ECCE or school will no longer displace childcare hours. As such families eligible for the 20 hours standard based on their work/study status can use all of these hours after school. It is anticipated that this will have the most significant impact on children in socio-economically disadvantaged communities and on services with high concentrations of families from socio-economically disadvantaged communities. As of 2 May 2022, parents may use their full awarded subsidised NCS hours – benefitting an estimated 5,000 children from low income families;

- the second change is that from September 2022, the NCS Universal Subsidy was extended to all children under the age of 15. It is not means tested so parents do not have to undergo an assessment to avail of this subsidy. The Universal Subsidy provides €0.50 per hour towards the cost of a registered childcare place for a maximum of 45 hours per week. The extension of the Universal Subsidy will benefit up to 40,000 children; and,
- the third change is the increase in the minimum subsidy available under the NCS from €0.50 to €1.40 per hour effective from 2 January 2023.

These changes are intended to make it possible for significantly more families to apply to the NCS.

162. Finally, the Sponsorship arrangement within the NCS offers additional supports for families with complex needs, above and beyond the benefits of the scheme to large numbers of disadvantaged children. Once a child meets the criteria for sponsorship by a given Sponsor Body, the child can automatically avail of up to 45 hours per week. In February 2023, 3,700 children had successfully submitted claims under this arrangement.

Participation in public affairs

Consider, in consultation with the representatives of the Traveller and Roma communities, legislative and practical measures to create the necessary conditions for their political participation, including representation at all levels, to more adequately reflect the composition of Irish society and better take into account the needs of the Traveller and Roma communities; systematically consult and involve representatives of the Traveller and Roma communities, in particular at local level, in the development, implementation, monitoring and evaluation of policy measures affecting them specifically

163. The Programme for Government *Our Shared Future (2020)* recognises that there is a need for greater diversity and gender equality in local government, and commits to empowering local authorities to encourage improved gender and ethnic mix in local elections.
164. On the 29 June, 2020, Ms Eileen Flynn became the first person from the Traveller community to be nominated to the Seanad Éireann [Irish Senate]. Senator Flynn has said that:

“the Oireachtas can be a place that of all of us are represented that includes people with disabilities, the Traveller community, migrants, refugees and just people from working-class communities [and that] minorities should have an equal voice in society at a political level.”

National Traveller Women’s Forum and Ethnic Minority Women and Local Politics in Ireland

165. Funding is provided to the National Traveller Women’s Forum (NTWF) which seeks to empower Traveller Women in working towards full (gender) equality and to support them in taking leadership roles within their own and the wider community. Additional funding was provided for community projects that support and promote leadership roles for Traveller and Roma Women.
166. In 2022, DCEDIY supported NTWF and the national network for migrant woman living in Ireland, AkiDwa, collaborating with Maynooth University, in the development of the research report *Different Paths, Shared Experiences: Ethnic Minority Women and Local Politics in Ireland*³¹. The recommendations of the report aim to improve the participation of ethnic minority women in local politics.
167. Information on the report, *Different Paths, Shared Experiences: Ethnic Minority Women and Local Politics in Ireland*, was made available to all Departments, State Agencies and national Traveller and Roma organisations represented on the NTRIS Steering Committee. The report recommendations will be examined in the preparation of new strategies being developed by DCEDIY to replace the three equality strategies currently under review: the National Traveller and Roma Inclusion Strategy, the National Strategy for Women and Girls and the Migrant Integration Strategy.
168. Additional funding is being made available in 2022 and 2023 under the Dormant Account Fund plan, which is subject to approval by the Department of Rural and Community Development, to allow the NTWF to progress a number of specific report recommendations and to support the

³¹ *Different Paths, Shared Experiences: Ethnic Minority Women and Local Politics in Ireland*, 2022, available at https://www.ntwf.net/wp-content/uploads/2022/03/15754_NTWF_Report_V8.pdf

provision of training, both for Traveller women and for elected officials. The recommendations are wide-ranging and are relevant to a number of Government Departments, to political parties, local authorities, training organisations and wider civil society.

169. In 2022, DCEDIY launched a project to support young Travellers in having a voice in local and national policy-making. Specifically, the project aimed to enhance awareness of Traveller youth organisations, communities and leaders of the potential of Comhairle na nÓg, Dáil na nÓg and the National Youth Assembly of Ireland as a means for young Travellers to have a voice in local and national government policy and decision-making, to create sustainable links between the Traveller community and Comhairle and other youth participation structures, and to provide a model for inclusion of seldom heard young people in Comhairle na nÓg.
170. Funding has been provided to further develop the project to support young Travellers in having a voice in local and national policy making in 2023. The development of pathways for greater inclusion of young Travellers will include a focus on what is already working well, building on and sharing successes and identifying room for improvement. This includes providing individual support for Comhairle coordinators and National Participation Office Participation Officers to engage with Traveller organisations at a local level, and providing training on the use of the *STATUS TOOLKIT Supporting Travellers Advance Through Universal Services*³², and providing guidance on how the toolkit could be tailored for Comhairle na nÓg.
171. A key principle underpinning the National Action Plan Against Racism (NAPAR – see paragraphs 80 and 81) is that affected groups should participate in the development of and oversight of all government policy initiatives and targeted measures to address racism. This refers in particular to the development, implementation and oversight of the actions and initiatives contained in this plan. As previously indicated, NAPAR was developed by an independent Anti-Racism committee appointed by the Government in 2020; members of the committee included representatives of Traveller organisations.

³² *STATUS TOOLKIT Supporting Travellers Advance Through Universal Services*, 2017, available at <https://www.youthworkireland.ie/wp-content/uploads/2022/03/Status-Toolkit-Final.pdf>

172. The Terms of Reference for the Traveller Accommodation Expert Group were drawn up in consultation with the National Traveller Accommodation Consultative Committee (NTACC) and include consulting “with all relevant stakeholders at local and national level, including Traveller representative organisations and other stakeholder groups represented on the National Traveller Accommodation Consultative Committee (NTACC) and Local Traveller Accommodation Consultative Committees (LTACCs). Such consultation will include an invitation for written submissions and a series of meaningful national, regional and local workshops/focus groups.” (See paragraphs 50 to 53 related to Traveller Accommodation)
173. Traveller organisations representatives are also involved in the development and monitoring of policy measures such as the National Traveller Health Action Plan (NTHAP see paragraphs 38 to 41) and the National Strategy for Women and Girls 2017-2020.

Articles 17 and 18

Cooperation with the United Kingdom

The Advisory Committee invites the Irish authorities, in respect of the Common Travel Area, to continue taking into account the needs of the persons belonging to the Traveller communities

174. Under the Common Travel Area (CTA), Irish and British citizens move freely and reside in either jurisdiction and enjoy associated rights and entitlements including access to employment, healthcare, education, social benefits, and the right to vote in certain elections. The CTA plays an important role in supporting the manner in which British and Irish citizens, including Traveller communities, live across Ireland and the UK.
175. Facilitated by support from the European Union, and steps taken by the British and Irish Governments, the operation of the Common Travel Area arrangements have been maintained following the UK’s departure from the European Union. The CTA is recognised in the EU-UK Withdrawal Agreement and the EU-UK Trade and Cooperation Agreement. In 2019 the Government of Ireland and the UK Government signed a Memorandum of Understanding, which reaffirmed their commitment to maintaining the CTA and the associated rights and privileges, in all circumstances. This brought greater clarity and certainty to longstanding CTA arrangements.

Since 2019, the British and Irish governments have also taken other legislative and administrative steps to support the operation of the CTA. On an ongoing basis, the Irish Government considers the needs of a range of cohorts of Irish and British citizens, including those of members of Traveller communities, in its work with the UK Government on maintaining the CTA.

176. Through its Emigrant Support Programme, the Irish Government supports a number of Gypsy, Roma and Traveller (GRT) organisations in Britain. The work carried out by these organisations includes supporting members of the GRT community in accessing services they are entitled to under the CTA.

Section IV. Specific questions

As part of the continuing dialogue with the Advisory Committee, States Parties may be invited to provide answers to specific questions, including as to the state of affairs of gender equality, which may arise from specific national circumstances.

APPENDIX I



Ireland's draft report for the Fifth Cycle of The Framework Convention for the Protection of National Minorities: Cairde Roma Team Feedback

Cairde

Cairde is a community development organisation working to tackle health inequalities among ethnic minority communities by improving ethnic minority access to health services, and ethnic minority participation in health planning and delivery. Since 2010, Cairde has been providing information and advocacy to a significant and increasing number of Roma families and individuals in Dublin, Balbriggan, and nationally. Cairde's National Roma Infoline was established in March 2020 to respond to Roma health needs in Ireland.

Overview

The document is heavily oriented towards the experiences and circumstances of Travellers living in Ireland. Information and/or data on Roma does not appear in the first two key sections: Health and Accommodation. While we understand Roma and accommodation will likely not feature as there are no accommodation actions for Roma in the most recent NTRIS, we feel it is vital that Roma health data is included.

The National Roma Infoline: Data on Health and Accommodation

The National Roma Infoline has some of the most recent data on issues affecting Roma in

Ireland. The Infoline was established in March 2020 to address the disproportionate impact of the COVID-19 pandemic on Roma in Ireland and is now in its fourth year of operation. As of March 2023, the Infoline has responded to close to 9,000 calls from Roma and service providers around the country. The following data is taken from Cairde's 2022 Annual Report on the Infoline, and may be of use:

Accommodation

- In 2022, 77% of calls to the National Roma Infoline were from or on behalf of Roma who were homeless. This included Roma sleeping rough, living in emergency accommodation, and overcrowded private rented accommodation.

Health

- In 2022, more than half of the calls (66%) to the National Roma Infoline were made from or on behalf of Roma with no medical card and no GP.
- In 2022, 521 calls made to the National Roma Infoline in 2022 involved health queries, including providing information on COVID-19, children's health, maternal health, mental health, organising prescriptions, and supporting clients to apply for a medical card.

Education

In the education section, Traveller history and culture is mentioned however there is nothing included on Roma. Perhaps it would be worth adding something here about Roma Genocide Remembrance (Porajmos), Romani Resistance, and slavery as topics which could be considered for inclusion in the national curriculum.

Article 5

The title in Article 5 should be amended to include Roma, e.g.: 'Support for the prevention and development of the Irish Traveller and Roma cultures'.

Article 10

Article 10 should also include considerations for Romani language.

Roma Participation in NTRIS Subcommittees

With regards to point 157 on page 54, as far as Cairde is aware, the participation of Roma in the NTRIS Subcommittees (e.g. employment and education), is minimal, and there is currently only one organisation that represents Roma issues on these subcommittees. Cairde recommends that more organisations working directly with Roma, should be included in these spaces.

If you have any queries, please contact:

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APPENDIX II



Submission to the Department of Children, Equality, Disability, Integration and Youth

Framework Convention for the Protection of National Minorities Ireland's Fifth Periodic Report 2023

INTRODUCTION

Our Coalition

This report is submitted as a coalition of six organisations which work towards achieving Traveller and Roma rights in Ireland. **Pavee Point Traveller and Roma Centre** is a national non-governmental organisation working towards the attainment of human rights for Irish Travellers and Roma in Ireland since 1985. The **National Traveller Women's Forum** is a network of Traveller women and Traveller organisations throughout Ireland that recognises the particular oppression of Traveller women in Irish society. **Minceirs Whiden** is Ireland's only all Traveller forum formed in 2004 to create a safe place where Travellers can come together and discuss the issues affecting their community. **Donegal Travellers Project**, formed in 1996, is one of the longest established and largest locally based community development organisations working for, and with, the Traveller community. The **Galway Traveller Movement**, established in 1994, aims to achieve equality and self-determination for the Traveller community in Galway city and county. Finally, **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.

This Report

We welcome the Department of Children, Equality, Disability, Integration and Youth circulating the draft report to Traveller and Roma organisations for our observations. This submission provides an update on the situation of Travellers and Roma in Ireland since the last opinions published by the Advisory Committee on the Framework Convention for the Protection of National Minorities. The report follows a thematic structure making reference to specific Articles of the Convention.

For further information, please contact:

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Section 1: Raising Awareness of the results of the Fourth Monitoring Cycle of FCNM

Raising awareness about the purpose and results of the FCNM should form an important part of the State's review process. More initiatives are needed to ensure that Travellers and Roma are made aware of this mechanism, moving beyond simply publishing the information on the Department website, which is not accessible to many in both communities. Once FCNM opinions and resolutions are published, the findings should be disseminated widely, using a partnership approach with Traveller and Roma organisations at national and local levels.

Section 2: Core Issue 1/ Article 3 Policy and Legislative Changes 1.1 National Traveller and Roma Inclusion Strategy

Implementation of the National Traveller and Roma Inclusion Strategy (NTRIS) has been slow and an implementation plan with targets, timeframe, and resources has not been put in place since the recommendation for immediate action in the previous FCNM review. NTRIS 2017-2021 is currently under review and the development of its next iteration has been significantly delayed.

In 2022, the European Commission assessed all National Roma Strategic Frameworks on the basis that they must have strengthened commitments as set out in the EU Roma Strategic Framework 2020-30. Ireland is the only country named in the report without an updated Strategy. Ireland's National Traveller and Roma Inclusion Strategy substantively aligns with the horizontal measures and policy areas of the 2020 EU Roma Strategic Framework; however, one significant gap is the absence of targets and related indicators, which needs to be addressed in the NTRIS post-2022.

Recommendation: Ensure the next NTRIS has a robust implementation and monitoring plan with clear targets, indicators, outcomes, timeframes, and budget lines with actions being resourced and implemented by all relevant statutory agencies.

1.2 Health

Travellers and Roma experience stark health inequalities when compared to the majority population, compounded further by the COVID-19 pandemic.¹

While acknowledging the progress in relation to the development, publication, and resourcing of the National Traveller Health Action Plan (NTHAP), which is ambitious and holds potential to have an impact on Traveller health experiences and outcomes, the Plan requires ongoing further investment. This is the first policy document that has a specific focus on Traveller health since the National Traveller Health Strategy 2002-2005. There is an urgent need for an ethnic identifier to be rolled out and health indicators developed to monitor and identify

¹ Infant mortality rate for Travellers is 3.5 times the rate of the general population and Traveller suicide rate is 6 times higher than general population, in Kelleher et al., 2010. Over 1 in 3 (38.9%) of Roma do not have a family doctor/general practitioner, in Curran et al., 2018. By 1 July 2020 over 150 Travellers have tested positive for COVID-19, with 3 deaths and 70 Roma testing positive and 7 deaths. Of those Travellers reporting tested for COVID-19, 12% are testing positive which is higher than the national figure of 6.7% in the general population. See HPSC figures [here](#). These figures are an undercount.

Travellers' access, participation, and outcomes in health, as well as the timely establishment of a National NTHAP Implementation Group.

Mental health is a key issue impacting the Traveller community. Traveller men are seven times more likely to die by suicide than the general population, and Traveller women are five times more likely. To address this, the State has committed in the Programme for Government to develop a Traveller Mental Health Action Plan, however, no progress has been made on this commitment.

Roma face additional barriers such as an absence of sustainable funding for a Roma health infrastructure as well as lack of access to medical cards, interpretation and translation supports. Roma without financial means continue to be denied access to medical and healthcare benefits such as a medical card due to restrictions imposed by statutory regulations. The impacts were noted in the findings of the 'National Roma Needs Assessment'², with 50% of respondents reporting that they did not have a medical card.

As a result of COVID-19 and the recognition of the urgent need to address Roma health inequalities, a positive development in this area has been some funding for health-workers working with Roma. To be effective, this model requires Roma health posts across the country and a nationally coordinated approach based on the social determinants of health and strong links with mainstream services.

Recommendations:

- a) Full implementation of the NTHAP, ensuring a clear dedicated recurring budget is allocated and protected to address Traveller health inequalities at national level and a national dedicated cost centre to monitor and track allocation and expenditure.**
- b) Implementation of ethnic equality monitoring, including use a standardised ethnic identifier (consistent with national census and inclusive of Roma) across all routine data administrative systems in health services, to monitor equality of access, participation, and outcomes in health.**
- c) Develop and implement the National Traveller Mental Health Action Plan, with clear targets, timelines, and resources.**
- d) Take concrete measures to improve Roma access to basic healthcare, including measures regarding the issuance of medical cards in Roma communities and improved access to interpretation services.**

² Pavee Point and Department of Justice (2018) National Roma Needs Assessment
<https://www.paveepoint.ie/wpcontent/uploads/2015/04/RNA-PDF.pdf>

1.3/Article 5 Accommodation

In 2019, an Independent Expert Group on Traveller Accommodation³ made 32 recommendations for the Government and a Programme Implementation Board has since been established to progress the implementation of the recommendations. However, implementation has been slow. Although the Traveller accommodation budget has been spent over the last 3 years, no new Traveller accommodation units were provided, despite the fact that 39% of Travellers are homeless⁴.

Roma face discrimination in accessing accommodation; severe overcrowding, poor living conditions, a lack of security of tenure, homelessness, and barriers accessing social housing and rent supplement. 46% of Roma in Ireland reported experiencing homelessness at some stage in their lives⁵. While the State has indicated a commitment to include Roma specific housing actions in the National Traveller Roma Inclusion Strategy (NTRIS), there are currently no such actions in NTRIS. It is vital that the Roma accommodation actions are developed in collaboration between all relevant stakeholders, including the Department of Housing, Planning and Local Government, Roma, and organisations working with Roma. This can help to effectively address the needs of the community, and have clear targets, indicators, timelines, and resources, with an assigned person to lead on implementation within the Department.

In order to monitor progress in terms of Traveller and Roma accommodation, implementation of ethnic equality monitoring across housing/homelessness datasets is needed. Accurate data will inform good policy and practice, protect the human rights of potentially discriminated minorities, promote equality and address discrimination. This includes the implementation of a universal ethnic identifier across all datasets (in line with the national census). While we acknowledge that some progress has been made in this area, we regret that this has not occurred in the context of accommodation and that Social Housing Support application form includes a Traveller-specific question which is contra to a human rights based approach to data collection.

Recommendations:

- a) 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.**
- b) Address the housing crisis among Roma by introducing clear actions and associated implementation plan and resources in the next National Traveller Roma Inclusion Strategy.**

³ Independent Expert Group on behalf of the Minister of the Department of Housing, Planning and Local Government, [Traveller Accommodation Expert Review](#), 2019.

⁴ Pavee Point (2021) The Traveller Community and Homelessness <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-PointTraveller-Homelessness-Advocacy-Paper-Oct2021.pdf>

⁵ Pavee Point and Department of Justice (2018) National Roma Needs Assessment <https://www.paveepoint.ie/wpcontent/uploads/2015/04/RNA-PDF.pdf>

1.4/ Article 12 Education

The coalition welcomes the explicit targeting of Traveller and Roma participation in the *National Access Plan for Higher Education 2022-28*⁶. However, none of the mainstream education strategies contain targets aimed directly at increasing Traveller or Roma participation at early years, primary or post-primary levels. The inequalities and exclusion faced by Traveller and Roma children in education, early childhood education and care are now exacerbated by the differential effects of COVID-19.⁷

The development of a National Traveller Education Strategy, a Programme for Government commitment, remains an urgent and outstanding priority.⁸ The State has indicated that a consultation process for its development is due to commence – however, we remain concerned at the timeframe for realising this. Our organisations are also concerned at the experiences of exclusion, racism and identity-based bullying of Traveller and Roma children in schools⁹. In this context, we welcome the development of the Action Plan on Bullying 2022 in primary and post primary schools, which needs to be implemented in collaboration with Traveller organisations and organisations working with Roma.

Recommendation:

- a) **Urgently implement the Programme for Government commitment and develop a National Traveller Education Strategy with targets to address the educational disadvantage experienced by Travellers at all educational levels. Ensure the Strategy has a robust implementation and monitoring plan with associated dedicated targets, indicators, outcomes, timeframes, and resources as well as a consultative structure to drive its implementation.**
- b) **Fully implement Cinéaltas - National Action Plan on Bullying, with effective monitoring processes and working in partnership with Travellers and Roma.**

1.5/Article 15 Social Protection and Employment

⁶ HEA (2022) National Access Plan 2022-28 <https://hea.ie/policy/access-policy/national-access-plan-2022-2028/>

⁷ Pavee Point and the National Traveller Women's Forum, *The Implications of COVID-19 for Traveller and Roma transfer to and progression within Higher Education. Report on National Forum, May 2020*. This has left Traveller and Roma learners at all levels attempting to undertake home study in the context of very difficult living conditions and often without access to WiFi or technology.

⁸ Government of Ireland, *Programme for Government: Our Shared Future*, 29 Oct 2020.

⁹ Traveller parents report that their children experience exclusion and racist name-calling, the majority of Traveller and Roma students say that bullying and racist name-calling is not taken seriously when they report it to school staff, bullying by teachers is also cited as one of the most frequent types of bullying that Traveller students experience, in Quinlan, M., *Out of the Shadows - Traveller and Roma Education - Voices from the Communities*, 2021. 12.% of Travellers surveyed indicated that they had been bullied by teachers several times a week at some point in the past year, including verbal abuse and exclusion, in Dupont, M., *A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system*, 2022. Curran et al., National Roma Needs Assessment, 2018, highlights how Roma respondents had to hide their identity to prevent or protect themselves against bullying and discrimination, both by peers and by school staff.

80.2% of Travellers and 83.3% of Roma face unemployment;¹⁰; 25% of Roma children report to have gone to school hungry; and 57.5% of Roma do not have enough money for schoolbooks and uniforms.¹¹ Yet the State has not introduced adequate poverty reduction measures regarding Travellers and Roma. There are no dedicated targets for reducing Traveller and Roma poverty in key mainstream policy initiatives related to poverty, social inclusion, or employment, including the Roadmap for Social Inclusion,¹²¹³ and while the Government has committed to the development of a Traveller and Roma Training and Employment Plan, no dedicated strategy has been developed to date to address the significant levels of unemployment faced by Travellers and Roma.¹³

The National Roma Needs Assessment¹⁴ found that 20% of Roma in Ireland are living in 'extreme' poverty and many are unable to access basic social protection. Many Roma are unable to obtain social protection payments due to the way the European Directive 2004/38 on the freedom of movement and residence is implemented.¹⁵ In the Irish context, this requires applicants to meet the Habitual Residence Condition (HRC).¹⁶ The Roma Needs Assessment found that 49.2% of households with children were unsuccessful in their application for social protection payments, and therefore were not receiving Child Benefit or other crucial supports.

Roma who reported being unsuccessful in their applications had on average lived in Ireland 8 years and cited issues such as a lack of documentation on tenancy and employment history, inability to negotiate an unfamiliar system, and language and literacy barriers as being key obstacles in this regard. 84.4% of Roma also reported feeling discriminated against in getting social welfare, regardless of the success of their application.¹⁷

Under the Public Sector Equality and Human Rights Duty, all public bodies in Ireland have a legal obligation to promote equality, prevent discrimination and protect the human rights of everyone affected by their policies and practices.¹⁸ The Irish Human Rights and Equality Commission¹⁹ has identified that the application of the HRC to Child Benefit is a human rights

¹⁰ Central Statistics Office, *Census 2016 Profile 8 - Irish Travellers, Ethnicity and Religion*, 2016.

¹¹ Curran et al., *National Needs Assessment*, 2018.

¹² The Pathways to Work Strategy 2016-2020, Future Jobs Ireland 2019, *Future Jobs Ireland- 2019- Preparing Now for Tomorrow's Economy*, Department of the Taoiseach and the Department of Business, Enterprise and Innovation, 2019.

¹³ % of Travellers have experienced discrimination at work, Kelleher et al., *All Ireland Traveller Health Study*, 2010, and 80.2% of Travellers are unemployed, Central Statistics Office, *Census 2016 Profile 8 - Irish Travellers, Ethnicity and Religion*, 2016. 78.9% of Roma feel discriminated against in getting a job and only 16.7% of Roma are employed, in Curran et al., *National Needs Assessment*, 2018. Roma who do not meet the right to reside or Habitual Residence Condition are not considered job seekers and therefore are not eligible for many training and employment supports.

¹⁴ Curran et al., *National Roma Needs Assessment*, 2018. 50% of Roma households with children reported not always having enough food, 58% of families reported not having enough money for books and uniforms, 1 in 4 Roma children (25%) have gone to school hungry, 39.3% of new mothers do not have supplies such as baby clothes, nappies, and formula, 66.3% of households cannot keep the house warm all the time, 10% of households do not have basic necessities in their accommodation, including a fridge, cooker, or kitchen

¹⁵ European Parliament (2004) [EU Directive 2004/38](#) the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States.

¹⁶ Department of Social Protection, [Habitual Residence Condition](#), 2020.

¹⁷ Pavée Point, [Chapter 7 Employment and Social Protection in National Roma Needs Assessment](#), 2018.

¹⁸ Irish Statute, [Irish Human Rights and Equality Commission Act, 2014](#).

¹⁹ IHREC, Report to the UN Convention on the Rights of the Child, Ireland's combined 3rd and 4th Periodic Report, 2016.

issue, particularly impacting children from migrant, Roma, and Traveller backgrounds as well as asylum seeking children.

Recommendations:

- a) Develop the Traveller and Roma Training, Employment and Enterprise Strategy in a timely fashion in an effort to combat the chronic unemployment levels impacting Travellers and Roma.**
- b) Make Child Benefit a truly universal payment that is not contingent on the fulfilment of the Habitual Residence Condition to ensure Roma children residing in the State are eligible for Child Benefit payments regardless of the legal or administrative status of their parents.**

Core Issue 2/Article 6 – Tolerance and Intercultural Dialogue

2.1 National Action Plan Against Racism

Pavee Point Traveller & Roma Centre welcomes the publication of a new and much needed National Action Plan Against Racism (NAPAR). NAPAR is a commitment to eliminating racism in all its forms in Ireland and our organisations welcomes the clear and early mention of Travellers as being directly covered by all provisions and recommendations in the plan. We also welcome the acknowledgement of racism as systemic in Ireland and that this requires responses within the structures and institutions of the state. In order to address anti-Traveller and anti-Roma racism, NAPAR must be afforded a sufficient budget and a clear implementation and monitoring framework; and be implemented in partnership with Traveller and Roma organisations.

Recommendation: Ensure that NAPAR is afforded multi-annual funding to support implementation and delivery of the Plan; that it has a strong monitoring framework and is implemented in partnership with Traveller and Roma organisations.

2.2. Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022

Our organisations have welcomed the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 which will legislate against hate speech and hate crime in Ireland. The Bill is now before Seanad Éireann for consideration. We particularly welcome that for the first time, the Bill includes Travellers as a minority ethnic group. The new proposed definition of incitement to hatred also goes further than the current legislation, which at present, has extremely low prosecution levels. For the legislation to be effective in preventing and addressing hate speech and hate crimes against minority ethnic groups it is necessary that the State rolls out special measures alongside the legislation.

Recommendations

- a) **Finalise the Criminal Justice (Hate Crime) legislation in a speedy manner and afford adequate resources for its full implementation.**
- b) **In addition, undertake complementary special measures, including anti-racism training for criminal justice professionals, a public awareness campaign, disaggregated data on reported hate incidents and annual targets to reduce the numbers of hate crimes.**

2.3 Data Collection and Population Census

Progress regarding the collection, disaggregation, and use of ethnic data has been slow. While progress has been made with the Central Statistics Office/Census and Pobal,²⁰ a number of public agencies and data systems do not collect, use or publish data by ethnicity.²¹ The Department of Education collects data by ethnicity on school *enrolment*, however, does not routinely publish or use the data or collect data about school *completion* rates. An Garda Síochána and Court Service stated there to be no legal basis for collecting ethnic data - despite the Irish Human Rights and Equality Act 2014, which mandates public bodies to promote equality, prevent discrimination and protect human rights through their services.

As a result, government policy, programming and budget decisions are not human rights proofed and we are unable to monitor the situation of minority ethnic groups. In this context, we welcome the development of a National Equality Data Strategy and commitment to have this in place from 2023.²²

²⁰ The Central Statistics Office has included Travellers as an administrative category in the Census since 2006, and Roma was included in Census 2022. Progress has also been made with National Social Inclusion Programmes.

²¹ 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 public service bodies have introduced ethnic identifiers in their data collection systems, including health services, the Irish Prison Service and Irish Probation Service. However, ethnic categories are not always 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 and/or used to inform policy/service planning.

²² Department of Children, Equality, Disability, Integration and Youth, [Minister O'Gorman announces the development of a National Equality Data Strategy](#), 21 March 2022.

Recommendation: Finalise and fully implement the forthcoming National Equality Data Strategy, and as part of this Strategy ensure the full and effective development and implementation of ethnic equality monitoring (in line with human rights standards) across all relevant state departments and public bodies.

Core Issue 3/Article 6: Access to Justice

3.1 An Garda Síochána

EU Fundamental Rights Agency survey 2019 found ethnic profiling of Travellers during police stops, with 14% believing that the most recent stop by the police was because they are a Traveller- this is the third highest rate compared to the other countries. Travellers' trust in the police in Ireland is the second lowest compared to other countries, and trust in the legal system is also the second lowest of all countries. A national survey of Travellers found that 48% of respondents felt discriminated against by the Gardaí in the last year¹. 77.5% of Roma report being stopped by the police for an identity document, and of those, 56% report being stopped four times or more¹

The Garda Síochána Code of Ethics doesn't specifically require the police to act in a manner consistent with equal treatment or non-discrimination²³. Where a breach of the Code may occur, there are no mandatory standards against which members of the police will be monitored or sanctioned²⁴. From our work on the ground and interactions with the Garda Síochána Ombudsman Commission (GSOC), we know that the use of complaint mechanisms by Travellers and Roma in relation to policing malpractice is extremely low. Yet we also know that Travellers and Roma experience discrimination and ethnic profiling by members of the police service.

Recommendations

- a) Resource sustained positive action measures to facilitate access to complaint mechanisms by Travellers and Roma in relation to police misconduct.**
- b) Introduce legislation to prohibit ethnic profiling by the police and other law enforcement agencies.**

²³ Policing Authority, Code of Ethics for the Garda Síochána, 2017. The Code requires Gardai to 'recognise and respect the dignity and equal human rights of all people, to treat everyone at all times with fairness and in a non-discriminatory fashion, and to oppose and challenge any behaviour or language that demonstrates discrimination or disrespect, in particular with regard to vulnerable individuals and minority groups'.

²⁴ Irish Council for Civil Liberties, A Human Rights-Based Approach to Policing in Ireland, 2018

3.2 Over representation in Prison System

Although Travellers account for 0.6 % of the Irish population, Travellers account for 22% of the female prison population and 15% of the male prison population.²⁵ A fifth of young people in custody in Oberstown Children Detention Campus are Travellers,²⁶ and almost 10 per cent of the people under probation supervision are Travellers.²⁷

Short custodial sentences or being placed on remand, can have a detrimental impact on family life for Traveller women particularly where they are primary carer's or in one parent families. In 2017, the CEDAW Committee recommended for the State to address the root causes of the overrepresentation of Traveller women in places of deprivation of liberty, as well as address the standard of conditions in prisons.²⁸

Recommendations

- a) **Identify and address the contributing factors to the overrepresentation of Travellers in prison, particularly Traveller women, as recommended by CEDAW Committee in 2017.**
- b) **Introduce alternative community-based responses for Travellers and Roma who have committed non-violent poverty related offences and or where short sentences are being imposed.**
- c) **Reduce the rates of custodial sentencing for non-payment of fines to Traveller women through the use of the Fines (Payment and Recovery Act) 2014²⁹.**
- d) **Develop special measures for early intervention, and pre and post-prison release support within Traveller and Roma communities, particularly for Traveller/Roma Mothers.**

3.3 Civil Legal Aid Review

In June 2022, the Minister for Justice established a Group to review the Civil Legal Aid scheme for the first time in its more than 40-year history. We welcome the State's commitment to a significant review of the civil legal aid scheme, which currently is not available for many types of cases relevant to Travellers, Roma and other people experiencing poverty and marginalisation.

In 2019, the UNCERD expressed concern about the lack of legal aid provided for appeals concerning social welfare, housing, and eviction, which has a significant impact on Travellers and Roma. Cases in the Workplace Relations Commission are also excluded from the scope of

²⁵ Irish Prison Service, cited in Lalor, T., [Travellers in Prison Initiative: Ethnic Identifiers in Irish Prisons](#), 2017. OIP Annual Report (2019) Table 1: Categories of Persons in Custody (as per date of OIP visit) The Office of the Inspector of Prisons indicated that Traveller women constituted 24% of the population of Dóchas Centre for women on the date of an Inspectorate oversight visit in 2019.

²⁶ In the first three months of '2019 the campus housed 72 individuals, of these 14 (19 per cent) were Travellers or from a Traveller background. There was a similar rate in 2018 and 2017', Irish Prison Service, 2019.

²⁷ Irish Penal Reform Trust, [Oberstown Children Detention Campus: Key characteristics of young people in detention for Q1 2018](#), June 2018.

²⁸ Recommendation 52(b) in CEDAW, 2017.

²⁹ which expands the options available for recovery of fines and reduce the numbers imprisoned over failure to pay a fine.

the Legal Aid Board. Employers and businesses can often afford to pay for private legal representation in equality cases before the WRC. However, persons making complaints about discrimination or unfair treatment in the workplace, often cannot.

An accessible, effective, sustainable, and reliable public legal assistance body should be in place, which will facilitate individuals and groups to effectively exercise their right of access to justice, including Travellers and Roma.

Recommendations:

- a) Comprehensively examine the functions of the Legal Aid Board, its resources, the criteria for legal aid, the areas of law covered, and the methods of service delivery.**
- b) Ensure equal treatment before tribunals and, in particular, designate the Social Welfare Appeals Office, the Workplace Relations Commission and Labour Court under the Civil Legal Aid Act.**

Core Issue 4/Article 5: Traveller and Roma Culture

4.1 Promoting Traveller and Roma Culture

Pavee Point has welcomed financial support by the State towards small projects as part of the annual Traveller Pride Week and International Roma Day, which aims to celebrate Traveller and Roma culture.

However, the Advisory Committee on the FCNM has noted that the funding provided towards Traveller pride week is ad hoc in nature and project-based. We support the Advisory Committee's call for the State to take immediate action to support Travellers in preserving and developing their identity and culture on a more permanent and ongoing basis, including by exploring the possibility of creating a permanent Traveller cultural centre.

Recommendation: Create a permanent cultural centre with sustainable public funding, in order to collect, and preserve the history, stories, songs and identities of Travellers, including the Cant language.

4.2 Nomadism and Trespass Legislation

The Traveller Accommodation Expert Review Report contains a specific recommendation to repeal trespass legislation: "Repeal the Trespass Legislation, in particular as it applies to publicly owned land, until an appropriate network of transient provision as envisaged in the 1998 Act has been provided". However, there has been no progress on this recommendation, or on the development of a network of transient sites, which was committed to in the Housing (Traveller Accommodation) Act 1998.

Recommendation: Repeal the trespass legislation and provide a network of transient accommodation sites, as committed to in the Housing Act 1998 and the Expert Review Report.

Article 4: Traveller and Roma Women and Girls

Ireland is currently preparing to develop the next National Traveller and Roma Inclusion Strategy and Strategy for Women and Girls. To date, actions related to Traveller and Roma women have not been adequately resourced, inclusion of Traveller and Roma women in broader gender actions has been insufficient and the associated implementation plans have failed to define or reach clear gendered targets, indicators or outcomes.³⁰

We have welcomed the funding for a dedicated Traveller specific domestic and sexual violence pilot project, now being mainstreamed, and urge the State to continue to support and further develop community led projects. Beyond this, the lack of a clear implementation plan with the Second National Strategy on Domestic, Sexual and Gender-based Violence 2016–2021 resulted in slow implementation and little evidence of outcomes for Traveller and Roma women. Mainstream awareness raising initiatives failed to reach many Travellers and Roma; the sexual violence prevalence study didn't include Travellers, Roma, or other minority ethnic groups in its scope; and the commitment to collect data by ethnicity by all relevant agencies didn't materialise.

The Third National Strategy on Domestic, Sexual and Gender-based Violence has been published and the State has indicated an intention to develop a robust implementation and monitoring plan for this iteration of the Strategy. There is also a commitment to establishing a dedicated Agency to drive improvements in this area. It is important that Traveller and Roma women are involved in these processes.

Recommendations:

- a) Ensure a coordinated and integrated approach to actions targeting Traveller and Roma women in the next National Traveller Roma Inclusion Strategy and National Strategy for Women and Girls and ensure the inclusion of Traveller and Roma women's voices and experiences in wider gender issues, research, and policy development by the state.**
- b) Ensure the Third National Strategy on Domestic, Sexual and Gender-based Violence has a robust implementation plan, including clear targets, indicators, outcomes, timeframes, and resources related to Traveller and Roma women, both through targeted special measures and inclusion in mainstream measures.**
- c) Ensure Traveller and Roma organisations are actively included and consulted in the work of the forthcoming Domestic, Sexual and Gender-based Violence Agency.**

We have welcomed that actions related to Traveller and Roma women have been explicitly included in the current NTRIS, NSWG and NSDSGBV and urge for prioritising such actions in the forthcoming strategies.

Article 12 Participation in Public Affairs

The first ever special measure to ensure Traveller representation in the Irish political system was taken in 2020 when the State appointed a Traveller woman to the Seanad.³⁰ Beyond this, commitments by the State have not materialised into measures to improve the representation of Travellers, or Traveller women, in political institutions and decision making.³¹ The Electoral (Amendment) (Political Funding) Act 2012 saw the introduction of gender quotas to national politics. No such quota has been introduced for Travellers, ethnic minorities, or women representing minority groups.

Furthermore, no special measures have been introduced to ensure Traveller and Roma inclusion - women or men in local politics, despite calls by numerous human rights monitoring bodies to address the significant exclusion of Travellers and Roma from decision making and wider political processes at local and national levels.³²

Recommendations:

- a) Undertake legislative and practical measures to ensure the inclusion of Travellers, including Traveller women, in political representation at local and national levels.
- b) Undertake special measures to promote the inclusion of Traveller and Roma interests (inclusive of women) in participative democracy, policies, programmes, and initiatives undertaken by Local Authorities.

Appendix 1: Suggested Edits for the Draft State Report:

Introduction/Background

10. Suggest removing the word **legitimate** from the sentence - *The Government supports the participation of Travellers in mainstream social and economic life, while continuing to acknowledge and respect the legitimate expression of Traveller culture and identity.*

11. Suggest adding an update on progress to the outlined Commitments in the Programme for Government.

11. Suggest adding the word *accommodation* in the following sentence:

*Ensuring that the housing/**accommodation** needs of the Traveller Community are met by local authorities and ensure that existing funding is fully drawn down and utilised.*

11. Suggest removing the line regarding Roma –

³⁰ Ms Flynn is the first Traveller Senator in Ireland. Initiatives are currently supported in voter education and registration in the Traveller community. The National Traveller and Roma Inclusion Strategy (NTRIS), National Strategy for Women and Girls (NSWG), and Sustainable, Inclusive and Empowered Communities (A Five Year Strategy to Support the Community and Voluntary Sector in Ireland) provide frameworks for the inclusion of Travellers and Roma in participative democracy mechanisms, political institution and decisions making. However, these frameworks have not materialised into concrete measures.

³¹ Some initiatives are currently supported in voter education and registration in the Traveller community.

³² FCNM, *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.

they have **some characteristics in common** with Travellers and are linked in our National Traveller and Roma Inclusion Strategy Replace with: *similar to Travellers, Roma are among the most marginalised and excluded individuals and groups in Ireland and are linked in our National Traveller and Roma Inclusion Strategy.*

Section 2: Core Issues/Recommendations for Immediate Action

34-44 Health

44. There are 27 Primary Health Care for Travellers Projects across Ireland, focusing on providing primary healthcare to members of the Traveller community, under the remit of seven Traveller Health Units. (*Insert: **This model was developed by Pavee Point Traveller and Roma Centre.***) The Primary Health Care for Travellers Projects fall within the HSE Community Health Organisation boundaries and are funded via the Community Health Organisation structures.

Note: The health section does not include any reference to Roma health, please see section: 1.2 in the submission

45-50 Accommodation

50. Suggest changing the line –

An “Ethnic Identifier” is now included on the Social Housing Support application form.

Change to:

There is a “**Traveller Question**” included in this form rather than an ethnic identifier.

56-58 Social Protection

Note: There is no reference made to Roma and access to social protection, please see section: 1.5 in the submission

Article 4 Traveller and Roma Women and Girls

Note: This section does not make reference to Domestic, Sexual and Gender Based Violence, please see Article 4 in the submission

Article 10 Use of Languages

125. Suggest removing the sentence – *The report suggests that there is a diversity of views within the Traveller community regarding the importance of preserving the language with one group described as viewing it as insignificant and a thing of the past.*

APPENDIX III



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The Irish Traveller Movement welcome the opportunity to comment on the fifth periodic report to the Framework Convention on National Minorities

The Scope of the Framework Convention as it applies to Ireland Comment on State reply to paragraph 7

The Irish Traveller Movement welcome many Government progressive undertakings since last reporting under the Framework, especially in conducting long called for reviews of legislation; the Civil Legal Aid Act, the Equal Status Acts, Media and Digital Acts, the establishment of the Media Commission, The Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill, and the Electoral Reform Act.

Traveller's explicit inclusion, and ring-fenced protection is not generally factored into National Government Planning Strategies and drives, or across public engagement matters in Irish life and in national research and design. Fundamental exclusions have underserved Traveller need, in accommodation, housing and planning, in education, in employment and safeguarding of central cultural priorities, and in social and economic life. Rights flowing from the principles enshrined in the present Framework, could potentially strengthen the conditions for Travellers in Ireland, access those.

Travellers have not asserted up to now, National Minority status, and have not waived that right. Instead, here is no confirmed position by the community, which is contra to the State reply as such 'that the Traveller community do not consider themselves to be a national minority in Ireland'. Notwithstanding the right to self-identify, the decision of the community to assert that right and seek Government acknowledged has not to date been advanced. Community dialogue and engagement would form the basis of any such future decision.

Section I. Practical arrangements made at the national level for raising awareness of the results of the fourth monitoring cycle and of the Framework Convention. 16, 17, 21

In 2019 a Joint Committee of the Oireachtas [Irish Parliament] on Key Issues Affecting the Traveller Community was established following advocacy for greater Traveller visibility in Parliamentary business and across policy scrutiny and design, to better serve Traveller inclusion. The decision was formed from broad political consensus. The 2019 Committee was ceased on the dissolution of the Dáil and Seanad, due to new government formation, and another established in 2021 to complete outstanding business and issue a report of recommendations, completing its work in November 2021.

- 1) The evolving report and focus on implementation of Traveller policy was welcome. However, dialogue with Traveller representative organisations of a shared understanding with Government of the role of the Joint Committee on those matters, has not evolved. Commitment and clarification of the dual role of other Joint Oireachtas Committees on Traveller policy themes, and the thematic focuses of any new

committee would give reassurance. Also, where and how matters raised in the Oireachtas Report of the Forum of a Family Friend and Inclusive Parliament in relation to Traveller's broad political representation, would be a further positive commitment.

Section II. Measures taken to address core issues

Review of National Traveller and Roma Inclusion Strategy (NTRIS): Comment on State reply to paragraph 31 & 33

The publication of a new plan before the end of 2023 is welcome. Impacts given the delayed review from 2021 and carried out in 2022 for Travellers across the plan are notable, see further outlined. The allocation of €5 million in 2021 and 5.6million in 2022 to address and augment specific actions was much needed but is without ring-fenced investment to deliver across the actions, or budgetary alignments cross departmentally, currently. It is hoped budget estimates for 2024 will be designed in view of forthcoming programmes and plans in dialogue with the community, and or, a further year will elapse towards the investment needed to redress impacts existing and progress delays, evident so far.

Health: Comment on State reply to paragraphs 39-41

The Budget 2023 commitment of €1.3 million, planned as a recurring investment towards implementation of the NTHAP, including enhancing and strengthening the Traveller health infrastructure, is welcome. Sustained investment is critical to address Traveller health inequalities, and level up fundamental equivalence to health supports and interventions.

The detailed regional five-year implementation plans for NTHAP by each CHO regionally, were due in April, initially February, but not evident yet. These will inform a detailed national implementation plan for NTHAP 2022-2027, and intended to outline annual priorities, indicators, timescale, and costings to inform the HSE annual estimates process to expand the Traveller Health budget going forward. The delays so far, are a cause of concern.

- a) **Data:** A fundamental obstacle across health strata is the absence of a systematic understanding of Travellers as service users. Ethnic questions are found in a small number of points, therefore concerns remain regarding the effective prioritising and or targeting of resources.
- b) **Making services fit for Traveller purpose:** Local Health services: There is a need for a Traveller Cultural Awareness/ Competency training for local health and mental health service providers, in light of Traveller's well documented alienation from services, through a whole of system training. Notable issues ongoing include; literacy, access to information, cultural gender expectations such as women wanting to be treated by a female doctor, and related cultural awareness.
- c) **Mental Health:** Of 24,473 self-harm and suicide-related ideation presentations, 744 (3%) were Irish Traveller patients. ⁽¹⁾ Traveller men 20-29 years had the highest suicide-related ideation amongst all Traveller men, and Traveller women aged 40-49yrs of their group. Compared to other ethnic groups, Travellers had the highest rate of self-harm acts overall at (61%)
 - o **Inclusion of mental health supports in the NTHAP are welcomed**, however confirmation (April 2023) that the National Traveller and Roma Mental Health Action Plan promised in the Programme for Government, will not be progressed with an independent plan as promised, is a cause of concern. The six actions to be delivered through the HSE with a ring-fenced budget of €300,000, are less than the demand requires.
 - o **Suicide data:** There is no ethnic data collected in Coroner Courts' Reporting or in Irish health services as a core data item and undermines the crisis in Traveller suicide. There is need for a national Traveller suicide observatory.
 - o
 - o **Traveller children and mental health:** The UN Committee on the Rights of the Child (Feb 2023) urged the State to devise a specific mental health strategy for Traveller children. The HSE are actioned to develop programmes to address mental health issues for young Travellers in the NTHAP, but the crisis is outpacing the critical demand and incidence. Exchange House Ireland found from Jan –March 2023, 6 suicides in community including 2 children, both aged 14 years.
 - o **There is concern also about the lack of reach in the data currently collected in Emergency Departments** as part of the National Clinical Programme for Self-Harm Ideation, which is critical and operating in 24 of

26 adult Emergency Departments but not in the Child and Adolescence Mental Health EDs. Therefore, not a complete national profile of Self Harm, or of suicidality in the community.

- d) **Coordination:** There is no indication so far of a Traveller mental health coordinator within the local Health Service Executive, to oversee the related actions in the Traveller Health Action Plan, and timeline to progress actions. An example: Since November 2022, there has been no Traveller Mental Health Co-Ordinator for Cork and Kerry, leading to gaps in delivery of certain projects. Two animation guides for young Travellers' accessing Child and Adult Mental Health Services, are not yet embedded within key services and programmes. It is notable The peak self-harm age for Traveller men and women, was for people between 20 and 29 years' old, however data below that age is not currently collected in Child or CAAMHS Emergency Departments, but where community based insights show a marked increase in young Traveller mental health crisis and suicide. ⁽²⁾

Accommodation: Comment on State reply to paragraphs 45-50

Population: According to the last annual count (2021) there are 11,118 Traveller families, approx. 46,695 to 58,925 people enumerated, an increase of 871 families nationally from 2019 to 2021. ⁽³⁾ The conclusive recommendation of the 32 made in the Expert Review Report, and the experience of National Traveller Organisations is that the key component missing in the Government's approach to tackling the Traveller accommodation crisis is an independent authority to oversee delivery. The design and structure of that is currently being reviewed by the Programme Board. Eight of the other recommendations are complete, since the 2019 report. Long term Traveller advocacy was instrumental in advancing reports of the European Social Rights Committee, the Expert Group, Spring Lane report (Office of the Ombudsman for Children) and the IHREC Equality Reviews, these all endorsed the serious crisis in Traveller accommodation and need for reform. **The foundational architecture for Traveller accommodation is absent, for example**

On implementation: There is no

- o national audit of need
- o national strategy or implementation plan
- o national budgetary plan
- o agency with responsibility

In alignment and coordination. There is no alignment

- o to National Housing and homeless strategies, (named only in the Homeless Youth Strategy and Housing for All as broad terms)
- o to the Housing Agency under their Housing for All functions
- o to local Housing Development Plans, (4 in OPRs report)
- o in most City and County Development Plans
- o with Ireland's National Development Plan

No targeted requirement in

- o local authority Housing Deliver Action Plans
- o in the Land Development Agency

Lack of alignment to Ireland's Housing Strategies: Two underpinning drivers absent in the 25 years since the legislative requirement of The Traveller Accommodation Act 1998, and which are evident across other Government housing plans; are a clear national strategy and an implementation plan with appropriate oversight. For example: The Housing Agency's Strategy 2022-2024, is aligned to the Government strategy, Housing for All, with oversight by a CEO and Board, and commits to objectives for other groups including;

- o Increase housing options for Older People
- o Increase and improve housing options and supports for people with a disability
- o Provide housing and supports to facilitate community integration for Refugees

- a) Oversight of Traveller accommodation has been outpaced and underserved by these Government formed structures for other groups, since the publication of the Expert Group Report including The National Housing Strategy for Disabled People NHSDP 2022 – 2027, and 2019 -2021, The Action Plan on 'Housing Options for our Ageing Population', Housing First (Homeless Strategy) and the Youth Homelessness Strategy. The NTRIS, predating the Expert Group Review, contained 6 related actions, however these too were not subsequently reflected in either mainstream (Housing) plans, or social

housing targets as promised. **For example**, it is noted in Cork, that Travellers are being removed/deferred from housing lists without clarity / rationale, a regressive practice and cause of concern and without national oversight.

- b) Delivery for Travellers is already manifested under statutory Instrument, but is without national governance, with the Expert Group noting the need for governance beyond the role of the NTACC which is 'purely advisory', and the establishment of a National Traveller Accommodation Authority.

Housing for All as the master Housing Plan for Ireland, there are no indicators to how many, if any, of the 9,100 new-build social homes, 5,500 new affordable homes for sale and rent and 6,500 new social homes outlined in the Budget 2023, have been earmarked for Travellers. In fact, most local authorities have not included Traveller provision within their plans, without intervention and oversight at national level too. Council specific reports of Housing Delivery Action Plans were submitted to the Department in Dec 2021, but a national outcome report has not been published.

A notable example: Traveller sites existing and planned, were not marked in Cork City's Development Plan, despite commitments given during consultations and evidence of substantial need. The Cork City Housing Action Delivery plan commits 50% of social housing to be delivered by AHBs, CCC's, but the Traveller Accommodation Programme makes no Traveller target commitment.

- a) The Housing Minister issued a Circular to Local authorities (Housing 32/2021 Housing for All) instructing them under various guidance towards the provision of housing for people with a disability and the provision of Age Friendly Housing but didn't include Traveller targeting. Travellers are not targeted either, in national Social Housing Delivery and Affordable Housing Delivery, as a specific requirement.
- b) In January (2023) the Housing Minister introduced a welcome temporary time-limited measure (a moratorium on Part 8 of the planning process) to accelerate the delivery of housing supply for local authorities in strictly defined circumstances, and a potential benefit for councils in the acceleration of Traveller specific projects. The Circular however did not name Traveller accommodation projects as a target.

Current need: Approx. 8,400 Travellers are in need. 2000 families are in overcrowded or emergency provision, or roadsides. A low estimate of 500 families or between 2,000 – 2,500 parents and children are vulnerable every day from roadsides, public or private land. 800 families are sharing housing with others designed for single family usage. There is a requirement to supply 1,400 units nationally during the current Traveller Accommodation Programmes⁽⁴⁾

Homelessness: Traveller women account for approximately 50% of the overall Traveller adult homeless population (11,988 people as of March '23).⁽⁵⁾ The commitment of a €500,000 plan to address homelessness among Traveller women is welcome for healthcare services and addressing the social determinants for those transitioning to independent living from homelessness. A consultation with Traveller groups is due, but not advanced to date.

- a) There are concerns that these welcome initiatives are being led without collaboration with existing Traveller structures / and synergised with stakeholders across Traveller accommodation points. For example, representatives at the NTACC, and informing the work of the Programme Board where homelessness is a defined action. The extent of progress with homeless agencies vis a vis data collection points and for training, outlined in the Board's work plan, is not clear. There is a specific urgent need for action focussed local Traveller Homelessness Task Forces.

Overreliance on standard housing: There is overreliance in current TAPs on private rented accommodation, and the Housing Assistance Payment and 50% of the 3,060 units planned by councils will be supplied this way⁽⁶⁾. In 2021, 1,882 Traveller families were in private rented, 325 (15%) using RAS, 803 (37%) HAP and 587 (27%) assisted by Rent Supplement. This long-term local authority approach has worsened the crisis for Travellers into a downwards slide to homelessness. This is also impacted by a growing national demand for accommodation and where Travellers are bottom tiered in securing private accommodation options.

Under delivery of Traveller specific accommodation: Only 10% of Traveller specific units were delivered in the last 5yr Traveller Accommodation Programmes nationally⁽⁷⁾. And the current one shows **only 44 units** were built from 2019-2021 with a need of 2,871 Traveller families (in 2020) recorded across TAPs. 12 local authorities show they

won't meet either their current and the projected targets during their 5-year programme⁽⁸⁾. This is evident now from the data collected below.

Year	Number Traveller specific units built
2019	10 (9 Group housing and 1 halting site service unit)
2020	16 (7 housing and 9 service units)
2021	18 (Halting Sites units)
2022	Unknown

Funding for Traveller-Specific Accommodation: Traveller-specific accommodation budgets were spent in full in 2020, 2021 and 2022 however the new draw down procedure from an "allocation" to a "request" based model looks on paper better, where authorities are utilising budgets, but off very low motivational and drawdown levels, and where spending has happened it's mainly for refurbishments rather than new builds, as shown. Budgets overall remain well below pre-austerity levels of €40 million to €20 million in 2023

Drawdowns: TAP 2019-2024

Year	Drawdown	Number of councils who did not drawdown
2019	€8,657,652	10
2020	€14,497,652	1
2021	€15,499,963	3
2022	€20,599,645	1

- a) **Estimates** There are no insights gathered to inform a proper annual budgetary analysis of TAP requirements from which the Dept can usefully seek appropriate exchequer funding. And this is not in the current work programme of the Programme Board but is essential to the task. The local authority Works Programme estimates, and Quarterly Pipeline Reports should form a working basis (and monitoring of progress), which are not currently available.
- b) **Housing size:** Only a very small proportion of social housing and private rental stock consists of large dwellings suitable to accommodate larger Traveller families. (average family size 5.3 persons.) So, a family facing eviction through the sale of a property by a landlord, will find it almost impossible to find another rental property, and be rendered homeless.
- c) **Thresholds:** For Travellers with larger families, who rely on social protection payments as sole income, some are over the threshold for social housing, and despite recent amendments (19/4/2021) are vulnerable to homelessness. The thresholds should be increased in all the Band 3 local authority areas.
- d) **Exclusion from mainstream supports:** According to the Supplementary Report to the Annual Count 2020, 468 families were on unauthorised sites, (roadsides, public and private lands and other locations). 330 families (approx. between 1,300- 1,700 people) applied for accommodation to their council, many waiting over a long period of time. These families are mostly reliant on generators to heat their homes, frequently living in grim circumstances, but they were exempted from the Government energy credit allowance.
- e) **Caravan Loan Scheme.** The Scheme now post pilot, is due for national roll out in 2023, but not evident yet. Feedback on the pilot has been advanced and there much demand for quality new mobile home supply, of a proper standard.

Education: Comment on State reply to paragraphs 51-55. (See also replies Article 12)

There is an urgent need for the Traveller Education Strategy to be expedited, with dedicated staff and resources to coordinate implementation in full consultation with Traveller organisations, following a commitment in 2017. Progress under NTRIS is welcome, but pace is slow to tackle retention at post primary level, and prevent early school leaving without a master education plan for Travellers. And government investment for Traveller learners from early childcare through to third level to redress the considerable poor educational outcomes, is needed.

Reduced Day. Following advocacy by Traveller and Children's NGOs, guidelines became operational in January 2022 and reporting by the Tusla Education unit to the DE was welcome, but ITM continue to raise concerns that Traveller parents are not sufficiently aware of their rights. The video produced to support Traveller parents produced in August 2022, is still subject to approval for release with DE officials.

- a) Evidence by Traveller parents show the practice is ongoing in some schools, with primary children being sent home at 10.30am for so called, behavioural issues. Cases reported in April 2023 are noted in Dublin, Cork, Kerry, Mayo, Wicklow and Waterford.
- b) The three quarterly monitoring reports from 2022 by the Tusla Education unit TESS, promised since the second half of 2022, are still awaited. There has been no direct engagement with Traveller parents by the DE and or education stakeholders, which contradicts the intention of the reformatory guidelines, a vital element to redress early school leaving arising from the practice.
- c)

Traveller Culture and Heritage in Education: Advocacy in 2018 by Traveller groups, for legislative protection of Traveller's unique position in the state, culminated in the Traveller Culture and History in Education Oireachtas Bill. The NCCA review of the curriculum was a progressive first step to ensure Traveller identity might be positively visible and part of school programming. The further Paper to inform educators published by the NCCA in Feb 2023, was welcome, but very delayed, given the 5 years since initiation by the then Minister. (More at replies under Article 12)

Funding supports:

- a) The is **no ring-fenced investment for Traveller education** now or at any time, and local and National Traveller organisations are not broadly resourced to work in the area
- b) The **investment under Dormant accounts funds for 4 workers in 2022**, and 10 Home School Community Liaison (HSCL) coordinators in 14 non-DEIS post-primary schools is very welcome, as is the increase of DEIS status schools. However, prior to the increase, only 50% of Traveller pupils attended those schools and there is no data / reporting yet of Traveller numbers in the recent additions, to strengthen confidence of targeted measures.
- c) **There is a critical need for expansion of supports**, to ensure Traveller retention in post primary. Targeted actions and further investment beyond the 4 STAR Pilot projects. The DE commissioned *Out of the Shadows* (evaluation report of the 4 STAR pilot projects) November 2021, found *'rather than feeling a strong sense of belonging, the predominant feeling among Traveller parents and students is one of being unwanted both in school and by the settled community more generally in society.'* The expansion of the pilot for a further 2-years, despite concerns raised by NGOs has choked progress on a national roll out of supports to all Traveller learners.
- d) There is evidence that even DEIS schools (outside STAR projects) report the transition from primary to post primary, requires additional support for some Traveller pupils, due to additional barriers which are not being met by 'catch all' mainstream supports.
- e) **Higher Education.** Much needed ring-fenced funding committed for 21 Higher Education Institutions of €450,000 per annum for 3 years is a reassuring increase to supports in 2020-2021, where according to the Department for Further and Higher Education, Research, Innovation and Science, there is improvement in retention, but still disappointingly low with just 33 students starting undergraduate degrees in 2020/2021, against a target of 150.
- f) **The Cineáltas Action Plan on Bullying** ⁽⁹⁾ was much anticipated, and included consultation with Traveller children, only one specific action featured; 'Publish a resource containing examples of, practice of teaching and learning about Traveller culture and history'. Two matters not featured were how this resource will be taught, and the critical need for teacher prior learning. Also, the Plan does not specifically address identity-based bullying for Travellers as an ongoing problem. The need for wider engagement with Traveller NGOs and stakeholders in collaboration with schools and stakeholders, would support the Plan. There are concerns evidenced in recent research reports, including where: 19% of Traveller pupils reported having been bullied in the past year at school, 50% believing it to be based on their identity. 62% of those students were bullied in the playground during break time and 46% in the classroom while the teacher was present. (Dupont. M. A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system, DCU ABC, 2022)

Social Protection: Comment on State reply to paragraph 56-58

The recent Guide 'Community Engagement in Local Planning and Decision Making' to effect positive improvements in Traveller lives and circumstances, and training for LCDs and Local Authority decision-makers to ensure the Guide is fully realised, are welcome. NTRIS is listed within the LECP guidelines as one of the national strategies which should inform the development of LECPs, but many obstacles remain including a lack of engagement with Travellers by local companies and authorities, and monitoring reports of targeted actions. What is known

- a) from Jan 2018-Oct 2022, 308 Traveller or Roma were referred to SICAP from Department of Social Protection and 46 referred to the DSP from SICAP, for life-long learning activity / labour market supports.⁽¹⁰⁾
- b) In the 2021 SICAP Report (last available), Travellers continued to have low representation on the caseload (3%) and 2% of the caseload every other year. To date of the 1,185 Travellers were supported through the Social Inclusion Programmes only 55 got a job, and 42 set up their own business. In 2020, 640 were supported, 23 progressed into employment, 8 into self-employment. There is greater ambition needed throughout the programmes for promotion to Travellers.

Exclusions from policy analysis and planning

- c) Concerns continue to be raised by Traveller NGOs that the **Survey on Income and Living Conditions**, the monitor for the Department of Social Protection 'will not facilitate disaggregation for all the nine equality groups, including Travellers', who are widely accepted to be one of the most socially disadvantaged groups in Ireland.⁽¹¹⁾ As many as 28 % of Traveller children grow up in severe material deprivation as of (2019).
- d) **Progress Reporting.** The Second Progress Report of the Roadmap for Social Inclusion 2020–2025, (October 2021 to June 2022) is absent of targeting therefore reporting on Traveller outcomes is not possible, it does however include disability monitoring. This critical omission impacts policy and budgetary decisions nationally.
- e) An ESRI audit undertaken alongside the Progress Report⁽¹²⁾ analysed poverty, **income inequality and living standards in Ireland from 1987 to 2019** for policymakers, academics intended to inform appropriate policy response, but did not capture Traveller data, largely in the absence of ethnic collection and or cohort surveying during the research periods analysed, but, from which the Survey on Income and Living Conditions SILC reporting, is based. As a, first track over time report, this fundamental omission, especially in view of its Europe wide benchmarking status, is of concern. The research report did underline the importance of Young People as a future priority focus, but not Travellers and other minority groups

National Equality Data Strategy: Comment on State reply to paragraph 59-60

The Equality Data Strategy 2023-2027, much anticipated towards greater inclusion for Travellers in service framing and reporting, is open (May 2023) for public consultation.

- a) The Central Statistics Office undertook an equality data audit in 2020 and found Travellers collected in only 12 datasets⁽¹³⁾ The need for an intersectional approach must be an underpinning element of any new plan, and specific collection for Traveller children. In 2021, a TUSLA (Child and Family Agency) equality data audit was conducted of all data sources held by them and Traveller data is captured in only six⁽¹⁴⁾ of the 22 data sources
- b) The fundamental inclusion in all research programmes at national public service level to inform mainstream plans and programmes, is a need not currently provided for. Cohort and sampling surveying across underrepresented and minority groups, would ensure ethical equality standards.

Combat discrimination faced by persons belonging to the Traveller and Roma communities: Comment on State reply to paragraph 60 -63

The Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 currently at Committee stage in the Dáil is strongly welcomed and its introduction a matter of urgency. Recognition of Traveller ethnicity in the main definitions has provided reassurance.

Given the potential impact on other rights, including the right to freedom of expression, to a fair trial, and accordance with general rule of law principles, the Coalition Against Hate Crime Ireland (including Traveller NGOs) are seeking Oireachtas support of the draft the legislation to ensure amendments, to offer the best protection for groups most vulnerable these include:

- a) **Part 1 – Preliminary and General**
 - The Bill currently lacks a definition of “incitement”.
 - Replace the current definition in the Draft bill of “hatred” to this; ‘means a state of mind characterised as intense and irrational emotions of enmity or detestation against a person or a group of persons in the State or elsewhere on account of their membership or presumed membership of a group defined by reference to protected characteristics, or any one of those characteristics’.
 - Replace all references to “hatred” (includes bias, prejudice, contempt, hostility and bigotry) in Part 3 with “hate”. The term “hatred” should be restricted in its operation to those offences set out in Part 2 of the Bill.
 - Government to commence a review of the operation of this Act, no later than 12 months after and make a report to each House of the Oireachtas
- b) **Part 2: Incitement to violence or Hatred:** The Bill should include references to “real or perceived association with a protected characteristic” in the incitement offences. And strengthen freedom of expression defence and remove the defences for certain ‘discourses’
- c) **Part 3: Offences Aggravated by Hatred.** That both the demonstration test and the motivation test should be provided for in section 20 in relation to aggravated sentencing.

In reference Specific campaign to raise general awareness of Traveller discrimination

There is no specific campaign to raise general awareness of Traveller discrimination, and or investment in public education programmes since the ceasing of the only programme of its type to date, the Citizen Traveller campaign 1999-2002. Traveller NGOs are under resourced and investment in a multi-level, coherent cross government and society strategy to improve systemic and societal discrimination is long outstanding, and siloed actions in other areas have shown low impact.

In reference Developing specific awareness-raising programmes and training targeting the owners and staff of licensed premises in particular;

- 1) No training or awareness programmes since the last report. The Irish Traveller Movement continued to call for review of Section 19 of the Intoxicating Liquor Act 2003. The Irish Human Rights and Equality Commission conducted a review in 2021, concluding Section 19 impacted more on Traveller, Roma and disabled people, than on other people’ and that only an extremely small number of cases at the District Court resulted in an Order for compensation. It wrote to the Minister in February 2022 calling for a review.
- 2) It found only 11 cases in total during 2017-2019, with no closure orders being made. ⁽¹⁵⁾.
- 3) Travellers continue to have unmet legal needs for these discrimination cases, taken to the District Court, which are covered by the Legal Aid Scheme, but securing legal aid is problematic, with many related obstacles.

In reference to recommendation The National Action Plan Against Racism (see replies to paragraphs 66-68)

An Garda Síochána AGS: Comment on State reply to paragraph 64-65

- 1) Improvements to Garda resourcing are welcome, including the now 481 diversity officers across AGS and a Hate Crime ELearning Programme developed in conjunction with NGOs and completed by 83.2% of all Garda members.
- 2) However, the Garda Traveller Diversity Committee, established to examine best policing practices for An Garda Síochána and key stakeholders towards development of consistent, non-discriminatory and effective service standards for consideration in future policies, training and recruitment campaigns, has met only twice in the last 2.5 years and is without an AGS lead to motivate ownership of the programme.

- 3) **The Public Attitudes Survey (PAS)** does not provide an adequate measure of views of Traveller and other underrepresented groups, using only a national representative sample. In 2022 concerns have been raised regarding the new Garda Diversity Internship Scheme, where problems are encountered and there is a lack of transparency in criteria. Recruitment of Travellers versus applications received have not been published.

Hate Crime and Hate Related Incidence reporting in 2022⁽¹⁶⁾.

- 1) There was a 29% increase in Garda Síochána recorded hate crimes and hate-related (non-crime) incidents in 2022. However, AGS recognised itself, these crimes are underreported.
- 2) The lack of ethnic data including Travellers, is notable. The most prevalent discriminatory motive was race (32%), followed by Sexual Orientation (22%) and Nationality (21%). Incidents were recorded across all 9 Discriminatory motives, but data is not interrelated / or disaggregated i.e. Where cases might have two or more bases for motivation. For example: Race and Sexual Orientation etc.

Hate Crime

Improvements in hate crime reporting are welcome, so too a new third party (witness to) element.

Travellers have been underreported and underreporting in racist monitoring complicated by historic apathy, discrimination and racial profiling by Gardaí. In 2022 ⁽¹⁷⁾ the ITAJ research found;

- 1) 59% of Travellers believed they were stopped by the Garda because they were a Traveller
- 2) 78% said the Garda who stopped them knew that they were a Traveller;
- 3) 53% said the Garda who stopped them had a reputation for stopping Travellers;
- 4) 46% stated that the location of the police stops contributed to their conviction that they were ethnically profiled.

The National Action Plan Against Racism Comment on State reply to paragraph 66-68

Consultation by the Committee in preparation of themes and focuses established by the Minister, was comprehensive.

- a) Although Travellers are not named in the final Action Plan ⁽¹⁸⁾ under objective Priority Actions, there is implicit understanding of protection under 'minority status' grounds. The thirty-three priorities earmarked for implementation in year 1 emphasise actions to be undertaken by public sector organisations, particularly central and local government authorities.
- b) A funding call for national and local organisations has been established and welcome, however there is no related Implementation Plan and or strategy to define approaches and specific targets, which is critical to ensure a broad scope of coverage to address need for minority groups including Travellers. Replication of the consultation strategy in the development phase with cross representation of interest groups would give confidence of commitments in the plan and help harmonise oversight.

Improve access to justice for Irish Travellers: Comment on State reply to paragraph 72- 74

In reference Improve access to justice for Irish Travellers "places of entertainment" has the same procedural guarantees as those provided by an anti-discrimination body

The Irish Traveller Movement welcome the Review of the Civil Legal Aid scheme, and the appointment of a Traveller representative to the Review Group in view of obstacles for underrepresented groups in accessing legal justice. **Evidence of need Section 19 Cases: a significant reduction in complaints taken, and a high rate of inadmissibility in determinations**

The obstacles noted by the Committee at last reporting remain, with differentials still for Travellers vindicating rights in cases in discrimination to The Work Place Relations Commission WRC. The CERD ⁽¹⁹⁾ 2019, also called for the State party "to take necessary steps to ensure that the discrimination in licensed premises is covered by the Equality Status Acts 2000 to 2018 and complaints be dealt with at the Workplace Relations Commission with a view to enhancing the accessibility of minority groups to effective remedies".

Further insights are not possible as Traveller information is not disaggregated across service locations of discrimination, gender, and intersectional grounds in the WRCs reporting, which is an additional concern.

Obstacles remain including:

- a) The lack of legal representation at hearings, and where local community organisations are required to act as amicus without resources and experience. **Recent example;** There have been funding cuts to services, such as the Traveller Justice and Equality Project at University College Cork, and average waiting times for the Legal Aid Board, is up to three months.
- b) The processes and procedures are not user friendly
- c) Cases are prepared without legal assistance, which necessitates familiarity and knowledge of complex legal matters.
- d) Travellers have difficulties still where cases appealed from the WRC are heard at the District Court, which are normally defended by a well-resourced legal team. Costs are prohibitive, and court assistance is not-permitted by a lay person.

Evidence of need matters currently covered in quasi-judicial settings

- 1) The FLAC Traveller legal service found of all its Traveller referrals from April 2020 – December 2022, 65 of 255 were based on discrimination. Information from the other Independent Law centres is not ethnically disaggregated.
- 2) There is a lower than expected number of Traveller queries related to the Equal Status Acts in IHREC data, showing; 39 overall in 2016 (22 ESA ground), 37 in 2018 (14 ESA), 38 in 2019 (14 ESA), and 28 in 2020 (19 ESA) and 6 in 2021 (information not available in 2017) ⁽²⁰⁾

Examples of difficulties to establish a prima facie case. In a case taken to the WRC ⁽²¹⁾ the adjudicator found; 'it is the role of the complainant to establish prima facie evidence that discrimination has taken place, and noting however "if the Respondent (local authority) continues to hold out on a demonstration of Equality Proofing, it is arguable that a complainant in future cases may face hurdles or obstacles in complaint progression." The judgment continued; 'The process was lacking in respect and dignity and disclosure of key information at key intervals, and 'pronounced systems failure' which needs immediate review", while further expressing concerns about a lack of an appeal system and the nexus between artificial intelligence and human interactions in housing allocations

(In reply 74) A secondment in late 2021 of a solicitor within the Legal Aid Board service to initiate training for solicitors and make more accessible the service to Travellers, was very welcome, with appointment in March 2023 of dedicated Managing Solicitor for Travellers.

- Three formal meetings with the Legal Aid Board and Traveller NGOS and a Traveller advisory committee is established. An implementation plan to evolve from this consultation, clarity on the scope and long-term vision of the Board vis a vis integrating a whole of service approach for Travellers, and promotion of the service, has been delayed since 2022.

Equality Legislation Comment on State reply to paragraph 75-77

The long called for review of the Equality Acts undertaken in 2021, provided wide consultation in the three areas covered, with a report delayed and due for first quarter 2023. It is hoped revision will be considered considering the review also of the Civil Legal Aid Scheme.

- a) The effectiveness of The Equality Acts for Travellers is undermined by Travellers unequal access to justice generally and where vindicating rights is indisputably greater than any other group in society and evidenced in all reporting of the Equality Tribunal as shown above. **Obstacles include:**
 - 1) A legal aid system and tribunal which do not sufficiently provide cover for Travellers or parity across all equality grounds, in practice and design
 - 2) Poor understanding among judiciary, legal aid board and legal professionals on equality legislation and lack of Traveller cultural competency, bias and institutional racism within the legal system and in policing.
 - 3) The absence of data, monitoring and assessment of Traveller's interaction with the ESA and justice across the grounds in different jurisdictions and locations

- b) **Data collection:** Queries related to ESA to the IHREC only human rights body collecting information related to the Act is noted above with a lower than expected number of engagements by the community.
 - However, IHREC data is not disaggregated for housing, accommodation and evictions. This is important as civil legal aid is not available on claims of discrimination in these areas, and, in access to services, education, for social welfare appeals, employment cases, and is limited in practice in housing and accommodation, and not available for eviction cases. So, it is not known if, how and where these queries are captured and, concerns remain that Travellers may, having faced an obstacle, decide not to pursue further legal vindication.
- c) **Impact of Exemptions:** In political dialogue, in public service and an Garda Síochána
 - There is no sanction for election candidates and public representatives who have articulated racism and anti-Traveller sentiment for example in electioneering matters, housing decisions, and policing matters.
 - The centrality of public services role, in lack of provision and or discriminatory practice, must be dealt with in any plan of reform of the Equality Legislation, given their current exemption.

Public Sector Equality and Human Rights Duty

- a) The introduction of the Duty was a reason for confidence, of equal and fair treatment from public bodies, However, eight years later the changes anticipated have not come about, with some institutions out of sync with national Traveller inclusion policy and not implementing their Duties, captured in 2022 research ⁽²²⁾ experiences of Travellers, particularly in accessing accommodation, justice and in respect of culture.
- b) There is no national audit of the Duty across public bodies, or equality data collection included in its actions and reporting. And bodies are not obligated to report for groups protected under the Equal Status Acts.
- c) It was found of a sample researched, that Travellers are the least likely group to be included in Plans of those public bodies, the first step of the Duty.
- d) Greater enforcement powers for the Irish Human Rights and Equality Commission, would improve effective implementation.

Support Travellers in their efforts to preserve and develop their identities and cultures: Comment on State reply to paragraph 78-84

In reference: Support Travellers in their efforts to preserve and develop their identities and cultures, including nomadism; consult them on the possibility of creating a permanent cultural centre with sustainable public funding to collect and preserve the history, stories, legends, songs and identities of Travellers, including in the Cant language; support the inclusion of Traveller culture and history in the curriculum taught in school. **(See additional replies Article 5 Support for the preservation and development of the Irish Travellers' identities and cultures)**

Investment and resourcing

1. Continued annual funding for Traveller Pride Week, €100,000 nationally in 2022, is welcome. €150,000 in 2021 to the National Museum of Ireland for a 2-year Traveller position to support the development of a Traveller archive, and related acquisitions, is a significant first small step. Replication across the institutions would deepen confidence.
2. The investment in 2022 of an Arts and Culture Coordinator with the Art's Council for a three-year period, to support the delivery of a specific programme of work, was much needed.
3. There was no ring fenced investment in the NTRIS, for promoting and safeguarding Traveller Culture and Heritage, and related NTRIS actions are the most stagnant of all.
4. National and local Traveller organisations are also not resourced to work in the area. So essential elements to promotion culture and heritage, are not being addressed which are critical too in combatting racism and discrimination through the election of heritage promotion and part of Ireland's wider context.

State investment in the Arts

- a) The national investment strategy “Investing in our Culture, Language and Heritage 2018–2027” does not name or include a budget for Traveller related initiatives, despite the commitment of €1.2 billion to national programmes. Mainstream arts programming should be broadly diverse and include Travellers, in a ring fenced and targeted approach, working in cooperation with the community
- b) The Arts Council's grant in 2023 is €130 million, but it is unclear the proportionate amount to respond to the Council's own undertaking of cultural diversity objectives. It is evident and welcome that there have been more recent focuses on gender and disability, but no dedicated Traveller funded schemes and bursaries. There are no ethnic equality monitoring metrics applied to Arts Council or Creative Ireland funding streams, which would support better targeting and monitoring.
- c) The extension of the Creative Ireland Programme to 2027 is also welcome, but Travellers were not evident in the consultation with local artists, creatives, cultural and heritage and community groups across the country, from which the five-year Culture and Creativity Strategy 2017 – 2022, evolved. Travellers were visible in a very small number of projects in the €6.6m allocated in 2022. Government replies that Creative Ireland will work to support existing and successor policies is reassuring, but to date no engagement in how that will happen has been advanced.

Correcting historical erosion

- a) As a safeguarding measure, as noted earlier, the Traveller culture and history in the curriculum Bill, was advocated for by National Traveller NGOs considering the need for legislative protection. Despite the Bill passing in the Seanad (House of Oireachtas), it was without government support for the amendment safeguard.
- b) Inclusion in National Government Strategies is important but not currently inclusive in design, and Travellers not factored into Ireland's broader plan across arts/ cultural, heritage / tourism and landmark plans and programmes. Government public consultations assume Travellers are included in broader public research cohorts and in national engagement strategies, which is not the case.
- 1. **Nomadism and Trespass Legislation** Despite the recommendation of the Expert Review Report 2019, and noted in the State reply too, progress to review of the Criminal Trespass Act has been stalled with delays encountered in legal opinion, and opposition from local authority interests, and motivation is stagnant, despite legislation reviews in other related areas such as the Equality Acts. The cultural, and human impact of the legislation is not being prioritised, as distinct from the legal implications.
- 2. Eviction of persons without alternative accommodation, or an appeals procedure, despite the impact on children and those with a disability, exacerbates the situation.
- 3. The lack of an eviction register to determine extent of Traveller evictions remains outstanding, undermining the problem and preventing adequate redress, and where further analysis of extent during the Covid period, is not available.
- 4. **State Apology** : In October 2022, the first ever national assembly of Travellers was convened, by the Irish Traveller Movement and endorsed the need for a State Apology in view of government practices and policies implemented over decades, which forced Travellers into housing, the separation and removal of Traveller children into care and institutions, identity specific institutional abuses in Mother and Baby Homes, County Homes, Industrial Schools and Laundries, the establishment of Traveller segregated schools and classes, and the treatment of children in those settings. Dialogue between the state and Travellers on recognising and acknowledging Traveller's historic experience, is needed.

Section III. Further measures taken to improve the implementation of the Framework Convention

Article 3 Personal scope of application of the Framework Convention Comment on State reply to paragraph 86- 88

In reference: Pursue efforts to acknowledge the place of Irish Travellers in Irish society and review, in this context, and in consultation with Traveller representatives, any legislative or policy changes required to

guarantee persons belonging to the Traveller community the effective enjoyment of the rights guaranteed by the Framework Convention

- The review of NTRIS as noted in Government replies, is currently underway and expediting the development of a new Plan, with ring-fenced funding across actions, and a centralised and dedicated unit within the Department to oversee and monitor delivery, is critical.

Data collection and population census 89-98 (See replies at paragraph 59-60)

In reference to: Adapt the new form of the next population census to allow voluntary and multiple self-identification as provided for in Article 3.1 of the Framework Convention; implement the relevant actions of the National Traveller and Roma Inclusion Strategy with regard to the collection of disaggregated data, by ethnicity and gender, in line with international data protection standards, and monitor such actions by the end of the implementation period of the Strategy; assess and analyse collected data periodically in close consultation with minority representatives in order to ensure that such data are duly complemented with information gathered through independent qualitative and quantitative research.

Equality Data Audit

A data subcommittee was established under the NTRIS monitoring Group in 2022, the overall action attached to the NTRIS involves a cross sectoral approach. Very clear recommendations were made by the Committee to the National Action Plan Against Racism, in the area of Ethnic Equality Data, which outlines the equality framing needed. Of what is available;

- a) A rich data set is collected via the annual count of Traveller families, however there are fundamental collection errors across local authorities, and what is available, is underutilised, despite it being the best available sample in existence.
- b) As such for population basis of need/ research designs and fundamentally housing and accommodation need, and in the latter case where this information is currently not being synergised with other housing collection points. Last count (2021) 11,118 Traveller families were enumerated. Local authorities enumerate in two different ways; some use family size others use household size. Comparators of the CSO, and last Census. shows Traveller family size 4.2 or household 5.3. That gives us the approx. number of individuals, approximately 46,695 to 58,925 people ⁽²⁰⁾

Article 5 Support for the preservation and development of the Irish Travellers' identities and cultures

In reference: Review the existing modalities for providing support to Traveller cultural projects, in particular with a view to ensuring the availability of institutional funding and Travellers' continuous and sustained presence in Ireland's cultural life

Protection and promotion Traveller's Unique Culture and heritage in its own right and part of Ireland's wider plan.

- 1) There is no lead within the Department of Tourism, Culture, Arts, Sport and Media and no advisory group to oversee a collaborative effort with national cultural institutions and Traveller organisations. Some collections hold a unique but limited range of Traveller cultural assets and ephemera, but not publicly available and where digitising is needed.
- 2) Collaboration with the community has also not emerged on a Traveller culture and heritage plan, especially since State acknowledgement of Traveller's ethnic minority status, March 2017
- 3) As noted, it was a very welcome inclusion in 2019, of Traveller tinsmithing and language ⁽²⁴⁾ onto the UNESCO Inventory of Intangible culture as part of safeguarding Ireland's living culture. The UNESCO Convention asserts each State Party 'shall endeavour to ensure the widest possible participation of communities, groups and, where appropriate, individuals that create, maintain and transmit such heritage, and to involve them actively in its management". Concerns remain that there has been no subsequent direction from Government as to how and where, this safeguarding will happen, and dialogue with the community on those matters.

Article 6 Combating hate speech and hate crime (See also replies at paragraph 60 -63)

In reference: Support the adoption of bespoke legislation on hate crime, in line with ECRI General Recommendation No. 15 on combating hate speech; improve the data collection system in this regard; consider monitoring hate speech in broadcast media as well as online in order to be able to further determine the nature and scope of the phenomenon and to address it, possibly as part of a new national strategy against racism; establish a mechanism responsible for monitoring social media as such

The comprehensive report of the Future of Media Commission was welcome, with significant ambition for Equality Diversity and Inclusion, the establishment of the Media Commission, and appointments of Commissioners for overseeing the new regulatory framework. Also, the appointment of the Irish Traveller Movement to the Stakeholder Advisory Forum. There is renewed confidence that outstanding concerns for Travellers about fair and balanced reporting, and inclusion and safeguarding in the digital space will accrue.

- a) **Protective Codes:** Essential protection by name is needed however in the development of 'media service codes' to mitigate against harm and offence and provide a strengthened safeguard. Travellers are not specifically identified for protection in the Online Safety and Media Regulation Act.
- b) **Complaints** Concerns remain in broadcasting content, for example; matters have been raised with programme editors and researchers in debating format TV, for the potential of offence or harm to Travellers on specific topics that could be interpreted as servicing media content demand, rather than due regard for invoking anti-Traveller discourse. This is particularly important given the procedural difficulties taking complaints up to now under the regulator, which requires 'self-monitoring' media content. It is reassuring The Media Commission, 'in so far as consistent with its other functions and its available resources', will undertake Strategic reviews. It is not clear if these include 'harm and offence' and uncertainty generally that the revised media service codes will redress those concerns.

Article 10 Use of languages (See replies Article 5)

In reference: Develop and implement a plan to revitalise the Cant language and in this respect support the production of any type of media content in the Cant language, in order to allow its transmission to, and popularisation among, younger generation

Article 12 Education of Travellers and intercultural education: Comment on State reply to paragraphs 129-134

- a) The **highest number of Traveller pupils** in post-primary schools was recorded for 2020–21, showing **3,292 and 8,148 were enrolled in primary schools.**
- b) In 2019/2020 470 students were enrolled in out-of-school education provision, of which **38 students were Travellers.**
- c) **Early school leaving:** The interconnectedness of identity based discrimination in education and poor mental health has not been tackled, and leading to poor long term outcomes
- d) **Supports:** Special needs, home tuition, speech and language, special transport are all determined by schools each year based across the student population. There is no transparency as to where and how these grants are supporting Travellers pupils directly.
- e) Travellers are not collected within **Special Needs cohorts**, so their intersectional experience is *not accounted for in government planning* and resources, and they are mainstreamed despite broad population statistical evidence which indicates **a higher rate of disability across the community (20%).**
- f) Policy and anecdotal analysis, (public data not available) shows Travellers with additional needs and who are also affected intersectionally, given accommodation and living conditions, parental educational status, and marginalization from additional need supports, are being underserved by mainstreaming approaches and lack of safeguarding monitors. **Examples of residual practice:** An autistic Traveller pupil at primary level was exempted from learning Irish, despite his obvious ability,

based on ingrained practice in schools for Traveller children to be exempted from the subject in many cases.

- g) **The Report of the Primary Online Database compiled** and disaggregated by the Department of Education DE of school's enrolment, **has been halted since 2017**, perceived as difficulties arising through GDPR, but found to be without a basis. This prevents needs analysis and resource targeting for example; with teaching supports, capitation grants, DEIS analysis, and an audit of the outdated use of Irish language as an exemption for Travellers based on identity. The second only report on the **data was promised for June 2022**, and still outstanding
- h) **Early years:** The Equal Participation model consultation being advanced by DCEDIY is welcome. Concerns noted for Traveller parents, regard the inflexibility of Pobal funding which links funding for childcare providers with attendance of children. Reporting shows 96% uptake of the ECCE scheme nationally versus 47% of Traveller children in 2018/ 2019. In 2021, Travellers represent only 1.8% of all uptake, and found only 17% of all services had at least one Traveller child attending ⁽²⁵⁾.
- i) **Mandatory intercultural and Anti-racism CPD** teacher training was a recommendation of the Report of the Joint Oireachtas Committee on Key Issues Affecting Travellers Dec 2022, and much needed. The new CPD coordinator post is a positive measure to support social inclusion initiatives. However, a plan is not evident, and or a compulsory anti-racism element is not actioned in the current strategies to date. The National Action Plan Against Racism NAPAR includes a recommendation for teaching practice, but not an action, and there is reliance on the Public Sector Duty obligations of public bodies, which has not accrued at the pace needed.
- j) **The Traveller and Culture and History in Education Bill is due before the Oireachtas education committee in the 2023 autumn term**, where it is hoped government will support the amendment needed to ensure legislative inclusion and define a programme of related work. It is unclear so far how any related inclusions arising from the NCCA's reports, will inform **the Department's Review of Primary and Post Primary Curriculum Frameworks, and Intercultural Guidelines, all currently underway.**

Tackling racism and promoting diversity in schools: There is no direct investment by the State for the Yellow Flag Programme, the only innovative programme of its kind in Ireland with a whole-school approach tackling racism at social and institutional level. Investment via the Asylum Migrant Integration Fund has maintained operation of the Programme to a limited number of schools only. In 2023 alone, 40 schools were declined from taking part due to a lack of state investment.

- 1) At the end 2022, over 118 schools had been awarded Yellow Flag, comprising 49,000+ students, from 200 countries and c.4,470 teachers.
- 2) Half of all schools who entered the programme in 2019 were surveyed (43bn) 54% of pupils said they had experienced racism, 74% wanted action on combating it. Currently, where identity-based bullying and racism occurs in schools, there is no incident management framework, and therefore is not systematically managed, recorded or remedied.

Grounds up insights Munster - Education

- ☐ **Local expertise as driver for change:** Liaison is needed with Community Development projects who have decades of trust with Traveller families, and education agencies
- ☐ **There is a need for 'outreach models** of education' and collaboration based practice facilitated by education stakeholders to support Traveller learners on their educational journey.
- ☐ **Consultation on Traveller led approaches** with local Traveller projects who work from best practice human rights standards, would enable better education outcomes.
- ☐ **Redress of intergenerational trauma.** A human rights framework and positive affirmation design is needed to shift the intergenerational trauma Travellers live with to bring about intergenerational empowerment. There is concern too that 'success' is crudely designed in the STAR education pilots, on a quantitative rather than qualitative metric

Article 15 Economic life

In reference: The Advisory Committee urges the Irish authorities to adopt an implementation plan with clear targets, indicators, timeframe and resources and to implement employment and economic measures listed in the National Traveller and Roma Inclusion Strategy without delay. Such implementation should be completed by the end of the implementation period of the Strategy and the measures taken should be monitored to ensure they address their respective objectives, in particular with regard to women

Employment and Enterprise

- a) 11.3% of Travellers were unable to work due to a disability, nearly three times the rate nationally. ⁽²⁶⁾ Uptake in Labour Market Activation Support is not available without an ethnic identifier but employment for Travellers was 15%, among the lowest rates in all countries surveyed in Europe FRA ⁽²⁷⁾
- b) 17 related Actions are in the NTRIS, with 7 under the direct responsibility of the Department of Employment Affairs and Social Protection DEASP, however these are scattered without cohesion and priority focus, showing poor progression and completion.
- c) A 5% increase of €283,000 for Traveller education and employment supports was included in Budget 2023, a welcome investment, but grossly inadequate to the need.
- d) The Traveller and Roma Training, Employment and Enterprise Plan promised in the Programme for Government 2020, is not evident yet.
- a) Commitments made in Pathways to Work 2021 – 2025 were critical for example “ring-fencing 1,000 places on public employment programmes for disadvantaged and minority groups, including Travellers and Roma, and a bursary programme. A Traveller specific and ring-fenced apprenticeship pilot programme for 1 year, was established in 2023, coordinated by the Department of Further and Higher Education across three streams: 60 Bursaries for Traveller apprentices, and €2,000 incentive payment each for their employers.
- b) Also funded is a one year one person National Traveller Enterprise and Employment pilot to conduct a national mapping audit of Traveller employment supports, assess workplace exclusion and identify potential opportunities towards a national strategy.
- c) A Traveller internship programme has been advanced in a small number of government offices <5, a welcome initiative and further engagement of NTRIS partners and Traveller organisations would support uptake.

Concerns remain that the pace needed to improve intergenerational poverty, is too slow and mainstream approaches are failing to drive incentive programmes and supports. There is no clear coordinator or an approach in the department with responsibility. For example:

1. As noted in Government reporting at NTRIS, from Jan 2018-Oct 2022, only 308 Traveller or Roma were referred to SICAP from Department of Social Protection and 46 referred to the DSP from SICAP, for life-long learning activity / labour market supports.
2. Job Seeker Activation Programmes are not Traveller targeted and delivered only in a mainstream way.
3. The expansion of the Youth Guarantee 24-29 was a potentially important, but the plan of personalised guidance and progression routes to appropriate further education, training and employment supports by Intreo, is limited without specific targeted approaches for Travellers, and data monitoring outcomes, is not ethnically disaggregated.
4. Traveller data was not collected; therefore, uptake is unknown of The Youth Employment Support Scheme (YESS) (ceased in Dec '21) aimed at young jobseekers facing significant barriers to employment, including Travellers. It was replaced with the Work Placement Experience Programme, the 6-month voluntary work experience programme for jobseekers on a qualifying social welfare, and no data is collected through this system

Participation in public affairs

In reference: Consider, in consultation with the representatives of the Traveller and Roma communities, legislative and practical measures to create the necessary conditions for their political participation, including representation at all levels, to more adequately reflect the composition of Irish society and better take into account the needs of the Traveller and Roma communities; systematically consult and involve representatives of the Traveller and Roma communities, in particular at local level, in the development, implementation, monitoring and evaluation of policy measures affecting them specifically

Only one Priority Action is identified in the final report of the National Action Plan Against Racism ⁽²⁸⁾, for Political Parties, the Department of Housing, Local Government and Heritage and Local Authorities by 2025-year end, to 'Establish public office mentoring programmes, and introduce positive measures to support the selection of minority ethnic candidates, based on the model in use to increase the numbers of women in politics.'

There are very clear recommendations made also for political participation by minority ethnic groups and promotion of voter engagement, but these are less than expected of the Plan where targeted actions are required and where ensure strategic alignment to local and general elections to achieve better outcomes in a time sensitive way, would strengthen actions.

- a) The gender quota requirement in 2012 for political parties (to select at least 30% of candidates of each gender for national elections or else lose 50% of their State funding) was welcome, but not intersectional or diverse enough
- b) Until the nomination to the Seanad in 2020 of Senator Eileen Flynn, on the back of advocacy and campaigning for that inclusion, Traveller's were invisible in parliament.
- c) Broader engagement of Travellers, minority and underrepresented groups, was hoped for, but there is no clarity of intention seen yet in The Electoral Reform Act 2022, which does not name Travellers.
- d) There is also good intention in the Report "Forum on a Family Friendly and Inclusive Parliament ⁽²⁹⁾", however, there is uncertainty of synergy and functional related roles of The Electoral Commission, established in February 2023, with that Report.

Systematic consultation Enhanced engagement and dialogue with the DCEIDY is central to a collaborative approach for the renewed National Traveller and Roma Inclusion Strategy, given low level outcomes arising from the last.

- 1) The 2023 report 'Terrain for Imagination and Challenge', supported by the Minister with responsibility examines obstacles to implementation of Traveller policies and general inclusion. It provides approaches, to ensure mainstream and targeted, have an intercultural approach and addresses racism experienced by Travellers at individual and systemic levels, and points towards an emphasis on local, regional and national planning and collaboration.
- 2) Further clarity is needed as to how this report will be considered/ incorporated into the current NTRIS review, and taking account of community dialogue currently planned, which is welcome.

Footnotes

1. See report https://link.springer.com/epdf/10.1007/s00127-023-02439-7?sharing_token=qNVXhc0-Dx6EiQU7H9qcF_e4RwIQNchNByi7wbcMAY72nph3OKKQbbOvQEImEqaQqGi_SLISvrXQ3v7Dk0dUrOhvhQu5SMH7Y2UzXvoS-KUBTBQ-oqEfcYFOs1F-KcQszyCCWPCKHtlU4wjGO0hjhv9qDpjUr7WbxEMhpMTKDqw=
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5. <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf>
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16. <https://www.garda.ie/en/about-us/our-departments/office-of-corporate-communications/press-releases/2023/march/an-garda-siochana-2022-hate-crime-data-and-related-discriminatory-motives.html>
17. The Irish Travellers' Access to Justice (ITAJ) report by the research team at University of Limerick
18. <https://www.gov.ie/en/publication/14d79-national-action-plan-against-racism/>
19. https://tbinternet.ohchr.org/Treaties/CERD/Shared%20Documents/IRL/INT_CERD_COC_IRL_40806_E.pdf
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22. <https://www.ucc.ie/en/media/academic/law/tejp/ImplementingPublicSectorDutyforTravellersIHRECREportNovember2022.pdf>
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