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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 Dail 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.

Underdelivery 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 form 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 reformative guidelines, a vital element to redress early school leaving arising from the practice.

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) There 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 breaktime and 46% in the classroom while the teacher was present. (Duport. 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 LCDCs 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 priory 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_e4RwlQNchNByi7wbcMAY72nph3OKKQbbOvQElmEqaQqGi_SLISvrXO3v7Dk0dUrOhvhQu5SMH7Y2UzXvoS-KUBTBQ-oqEfcYFOs1F-KcQszyCCWPCKHtlu4wjGO0hjv9qDpjUr7WbxEMhpMTKDqw=
2. Ibid
3. <https://www.gov.ie/en/collection/29c76-traveller-accommodation-statistics/#2021>
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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/ImplementingPublicSectorDutyforTravellersIHRECRReportNovember2022.pdf>
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29. <https://www.oireachtas.ie/en/members/office-holders/ceann-comhairle/forum-on-a-family-friendly-and-inclusive-parliament/>