

The National Roma Network

Roma Accommodation Advocacy Paper

November 2022

1. Executive Summary

The National Roma Network: The National Roma Network was established on the 8th April 2019 by Pavee Point Traveller and Roma Centre and it is a joint initiative between all organisations attending the Network. The Network is open to members from civil society organisations and agencies who work with the Roma community in Ireland, creating a shared space to; share experiences, inform policy, and advocate collectively in relation to Roma issues. The Network operates from a human rights perspective and is underpinned by the principles of community development, advocacy, collaboration, and participation.

Statistics Roma Housing and Homelessness

- Almost half (45.7%) of Roma have been homeless at some stage in their lives
- 1 in 5 Roma (24%) live in households of 8 or more people
- Almost half (44.8%) of Roma do not have enough beds in their accommodation
- Almost 1 in 10 (7.3%) Roma live in households with 10+ people¹
- A snapshot of 41 Roma families (with 111 children) living in a variety of homeless accommodation in Dublin in 2021 found that 59% were living in Private Emergency Accommodation, and 39% didn't have a keyworker. 100% had not had a house viewing or any movement in their situation²
- In 2021, 66% of calls to the National Roma Infoline were made by or on behalf of Roma who were homeless. This includes Roma who were sleeping rough, living in emergency accommodation, in unsafe and overcrowded private rented accommodation, and self-isolation accommodation³.
- In May 2022, it was estimated that 75% of the Roma population in Tipperary are homeless and/ or living in insecure housing with a risk of homelessness⁴. 38% of Roma families are paying rent to landlords in cash without receiving receipts or being provided with rent book/lease/ rent agreement.

This collaborative advocacy paper from the National Roma Network compiles evidence directly from the Roma Community through organisations working with Roma across the country. There is an absence of research and robust disaggregated data on the experiences of Roma in terms of housing and homelessness. This paper seeks to highlight the barriers that Roma face in accessing safe and suitable accommodation, using real life case studies to illustrate the findings. The paper calls on the State to adopt a human rights approach to addressing the accommodation needs of Roma, who should be included within mainstream housing and homeless policies and responses. Clear, targeted measures are also needed in the next iteration of the National Traveller and Roma

¹ Points 1-4 feature in Pavee Point and Department of Justice (2018) National Roma Needs Assessment <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

² The Roma family support team (within the Homeless Healthlink, HSE CHO 7) in Briefing Report: COVID-19 Roma Response Partnership Supporting Roma during the pandemic: Key Learning & Pathways Ahead

³ Cairde (2022) National Roma Infoline Annual Report 2021

⁴ HSE Social Inclusion CHO 3 and CHO 5 (May 2022) Tipperary Roma Health; Accommodation Project application

Inclusion Strategy (NTRIS) to address the housing and homeless crisis Roma are currently facing. The National Roma Network recommend that these actions include:

Recommended Roma Accommodation Actions for NTRIS:

- Appoint a Nominated **Person/s within the Department of Housing, Planning and Local Government** to lead implementation of Roma accommodation actions in NTRIS
- Implement **ethnic equality monitoring**, including the introduction of a standardised ethnic identifier in line with the national census, across all statutory and voluntary housing and homeless datasets. This includes datasets for allocations of social housing, and on homelessness.
- **Local Authorities to review all housing and homeless support processes through an equality lens** considering the State's legal obligations under the Public Sector Equality and Human Rights Duty, and the disproportionate impacts of the housing crisis on ethnic minority groups, including Roma.
- Provide **emergency humanitarian supports**, including shelter, to vulnerable Roma families. (Provision of emergency homeless accommodation is specified in primary legislation and therefore the Housing Circular 41/2012 should not apply).
- **Review and update the application and provisions of the Housing Circular 41/2012** across all Local Authorities as a barrier to Roma families accessing adequate social housing and housing support, considering the findings of IHREC's Equality Review of Non-Irish Nationals Access to Local Authority Accommodation Services in Dublin Local Authorities⁵.
- **Review the impact of other regulatory barriers**, including the Habitual Residence Condition which prevent many Roma from accessing social protection payments, emergency accommodation, and domestic violence supports.
- Homeless service providers to have **dedicated liaison staff for Roma** who can build knowledge, relationships and trust with the Roma community.
- To address the issue of Family rough sleeping (which is impacting Roma families), establish an **Out of Hours Family Outreach Homeless Service**.
- Provide **appropriate interpreter services** within statutory and voluntary housing and homeless services where and when needed.
- Train housing workers and officials in **anti-racism and discrimination training (inclusive of anti-Roma racism)**, and use of interpreters.
- **End the practice of separate accommodation** of parents from children in the absence of valid reasons. The reasons for separation should always be stated clearly
- Work collaboratively with HSE and Department of Health to **address the current and emerging Roma health inequalities that are compounded by homelessness**

"I lived in homeless accommodation with my husband and 4 children while I was pregnant with my fifth child. We all slept in one room with a double bed and a bunk bed. Some days I had to spend all day outside in the rain with my four young children because we were not allowed back in the accommodation until the evening".

Roma Service User, National Roma Infoline (Cairde)

⁵ IHREC (2021) Annual Report 2020n www.ihrec.ie/documents/annual-report-2020/

1. Introduction

As the National Traveller and Roma Inclusion Strategy (NTRIS) is currently under review, with a new strategy due to be in place by 2023, it is vitally important that Roma accommodation needs are considered in its successor. In the previous iteration of NTRIS, Roma accommodation actions were not included. The NTRIS Steering Committee has identified this as a significant gap and has committed to the inclusion of Roma accommodation actions in the next NTRIS. This is also in line with the commitments and targets set out in the EU Roma Inclusion Framework 2020-30 which the next iteration of our National Strategy must be based upon. These targets are:

- **Reduce gap in housing deprivation for Roma by at least one third**
- **Cut gap in overcrowding for Roma by at least half**
- **Ensure that at least 95% of Roma have access to tap water**

It is vital that the Roma accommodation actions in NTRIS 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 of the agreed actions, 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.

2. Key Accommodation Issues for Roma

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 supplement⁶. 46% of Roma in Ireland reported experiencing homelessness at some stage in their lives⁷. It is understood that this figure would be significantly higher, if those living in hidden homeless situations (e.g.) with family and friends in overcrowded conditions, were also included.

2.1. Discrimination and Access to Private Rented Accommodation

The majority of Roma in Ireland live in private rented accommodation. 93% of Roma report facing discrimination in accessing the private rental market, with many landlords refusing to accept Roma as tenants⁸. This high incidence of discrimination means that Roma families are often forced to accept whatever housing is available to them, which can be substandard/unsafe. Additionally, there is a shortage of appropriate accommodation on the market for larger Roma families, particularly within their budget⁹.

Overcrowding and poor living conditions are significant issues for Roma in Ireland. Almost a quarter (24%) are living in households of 8 or more people and 7% with 10 or more. A

⁶ Pavee Point and Department of Justice (2018) National Roma Needs Assessment <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

⁷ Pavee Point and Department of Justice (2018) National Roma Needs Assessment <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

⁸ Pavee Point (2018) National Roma Needs Assessment <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

⁹ In the National Roma Needs Assessment the average Roma family size was 5.55 compared to the Irish average of 2.75

further 45% report not having enough beds in their accommodation¹⁰. There are many instances of families living with rat infestations, damp, broken windows, leaking toilets and no water and/or electricity. When Roma experience exploitative living conditions, it is difficult to seek support or redress, unaware of their rights as tenants.¹¹ Complaint mechanisms are often inaccessible to the Roma community due to a lack of accessible information, language barriers, the digital divide, fees involved in RTB dispute and appeal processes, as well as lack of alternative accommodation options available.

Case One: Living Conditions in Private Rented Accommodation

On outreach in Waterford city in 2020 staff met with Czech and Slovak Roma who were not engaged with Roma services. One family comprised of 2 parents with 4 children under 6 years of age. They were living in slum conditions even though the Landlord was in receipt of HAP payments. The conditions included:

- Children were sleeping on mattresses on the floor
- Kitchen cabinets were broken, no fridge or other furniture.
- Damaged flooring which led to cockroach infestation
- Broken windows in living room (very dangerous for children as flat was on first floor)
- No lights in entryway of flat.

Staff contacted the Council Housing Inspector and accompanied him on an inspection of the dwelling. The inspector had serious concerns about the windows and front door lock of the property as it was facing onto a busy main road and posed a danger to the children. Staff also contacted Focus Ireland and the housing section of the Council to convey their concerns. The housing inspector also submitted a detailed report.

Outcome: On this occasion with significant support from the projects and based on the inspector's report, the family were rehoused permanently in a 3-bedroom house with a garden.

U-Casadh and Roma Atelier, Waterford

Case Two: Evictions, Tenant Rights, and Access to Interpreters

A young Roma single mother was living with her baby in rental accommodation in the Dublin region and could no longer afford to pay her rent. Her landlord moved the tenant's belongings outside the house and asked her to leave the property. The Roma woman did not know what to do and called the Infoline for support. The Roma Infoline Worker informed the caller that the landlord was acting unlawfully and provided information on her rights and entitlements as a tenant. The Roma Infoline Worker also contacted RTB and arranged for a phone conversation between the Infoline, RTB, the landlord and the Roma tenant. In the conversation RTB informed the landlord of the potential legal consequences of not letting the young mother and child stay in their home. In this call, the Roma Infoline Worker was able to interpret for the Roma woman. As a result of this intervention, the tenants were able to remain in their home.

National Roma Infoline (Cairde)

¹⁰ Pavee Point (2018) National Roma Needs Assessment <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

¹¹ Such as a landlord's obligation to register under the Residential Tenancies Board (RTB), or to provide contracts/rent books.

2.2. Access to Homeless Services and Social Housing Supports

The low number of Roma who identified as living in Local Authority accommodation (13%) was noted in the National Roma Needs Assessment¹². Department of Housing Circular 41 of 2012 provides guidance to Local Authorities in relation to: "Access to social housing supports for non-Irish nationals". Roma have found that the criteria in the Circular continues to form a systemic barrier to accessing homeless services and Social Housing support despite the fact that the Circular is not applicable to the provision of homeless services and is significantly out of date.

The Housing Assistance Payment cannot be accessed unless an individual is on the Local Authority housing list. To access Rent Supplement¹³ you must meet the strict criteria of that scheme in its role as a short-term support, and as a pre-requisite, satisfy the Habitual Residence Condition or hold worker status under EU Law.¹⁴ As a result, Roma households who often experience; high levels of unemployment¹⁵; racism and discrimination; and exploitative/unregistered work, find it more difficult to access these supports.

Applying for social housing is a lengthy and difficult process, and applications are often delayed. It can be very difficult for Roma/organisations working with Roma to track the progress of applications and interact with housing officials. The digital divide and lack of language supports also form significant barriers. Roma face difficulties establishing their local connection and which Local Authority will conduct their housing (and prior to that their homeless) assessment. It is often the person's place of employment that determines this, which can negatively impact Roma, as their place of work can change more regularly due to working for agencies/in precarious employment. The process is not interactive and is based on a prescribed form that only allows one entry as regards local connection¹⁶ As a result, other indications such as school placement can be easily missed, and this can lead to housing applications being returned and a new application required. This has unfortunately happened to some families on multiple occasions due to the rigidity of the administrative process. In some cases, families who are in emergency homeless accommodation have found their placements under threat, where no Local Authority has taken ownership of their case. The failure to adequately use the wide discretion available to Local Authorities under the legislation governing the provision of homeless services and the capacity of Local Authorities to undertake a social housing assessment is a significant contributor to households languishing in extremely difficult situations.

Case Two: Application of Right to Reside and Habitual Residence Condition - Emergency Accommodation

COPE Galway has undertaken outreach over the last number of years and has seen an increase in the number of migrants rough sleeping in the city, in particular those who are Roma. Due to capacity issues, there are a limited number of emergency beds available in the city. This has presented many challenges including the inability to adequately support households away from rough sleeping and homelessness. Those who do not appear to have an obvious right to reside or meet the Habitual Residence Condition (HRC)¹⁷ have

¹² Pavee Point (2018) National Roma Needs Assessment <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

¹³ Supplementary Welfare Allowance Rent Supplement

¹⁴ as defined in Statutory Instrument 548 of 2015 (the legislation transposes Directive 2004/38/EC "on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States".

¹⁵ 83% of Roma reported being unemployed in the National Roma Needs Assessment

¹⁶ Statutory Instrument 116 of 2021 Schedule (Regulation 4) page 19

¹⁷ This is not a provision of law applicable to services provided under the Housing Acts

little likelihood of being approved for a full-time bed, meaning they must present every evening and attempt to secure a bed.

In order to move out of homelessness, for many, the only pathway is through employment, however securing and maintaining employment is extremely difficult meaning individuals face long term rough sleeping and being reliant on members of the public and homeless services.

For example, we have provided services to one individual since 2018, who has been provided with emergency accommodation when available but has been rough sleeping for the majority of this time. He has little English and has no prospect of securing employment or being approved for social housing. Unfortunately, this case is not a unique situation and we are concerned it will become more a frequent and persistent issue. It is our opinion that, unless discretionary powers are appropriately exercised by Local Authorities and outcome focused national policies are put in place, some migrants including Roma will remain rough sleeping long term. Consideration should be given to working with relevant agencies to identify vulnerable long-term migrant rough sleepers including Roma and to transition them into suitable accommodation regardless of their HRC status.

COPE Galway Homeless Service

Case Three: Housing Assistance Payment (HAP)

There are Roma families who have been awarded HAP, but even so, they struggle to afford private rented accommodation (especially in the Dublin area). E.g., a family of 2 adults and 5 children, one minimum wage income, has been awarded a HAP of 1200 euro per month, where all suitable accommodation for their family would be between 2400 and 3500 euro monthly. Another challenge is being able to pay the deposit and first rent in advance (requested by all landlords). The majority of the families I have come across, are struggling to live from one paycheck to the other, and cannot afford to save enough money to cover this payment. As a result, they are forced to end up in homeless accommodation, where they will be reassessed for Homeless HAP, which includes the deposit. In most situations, it could have been prevented for the family to experience homeless accommodation, if the deposit and first rent were granted under mainstream HAP. Rather than being a discretion limited by a fixed percentage, an individualised assessment of circumstances and need similar to that allowed for Exceptional Need Payments under the Social Welfare Act would provide a more tailored response.

New Communities Partnership

2.3. Application of the Housing Circular

As was referred to above, the National Roma Network has noted in our experience that the application of the Housing Circular 41 of 2012¹⁸ is precluding many Roma from accessing social housing supports and some emergency accommodation. The core conditions of the Housing Circular are that in order to be assessed for social housing support, EEA citizens must be employed, have more than 52 weeks of employment or be a temporarily unfit worker. We know that this has a disproportionate impact on the Roma community, as due to racism, discrimination and intergenerational disadvantage, the unemployment rates are

¹⁸ Environment, Community and Local Government (2012) Housing Circular 41/2012
<https://www.housing.old.gov.ie/sites/default/files/migratedfiles/en/Publications/DevelopmentandHousing/Housing/FileDownload,2941,en.pdf>

much higher for Roma and they are disproportionately exposed to precarious or unregistered work.

Those who do not meet the criteria set out in the Circular can be erroneously found to be ineligible for a social housing assessment, even though Local Authorities can conduct housing assessments at their discretion. According to IHREC's Annual Report 2020¹⁹, The Commission invited four Local Authorities in Dublin to undertake an Equality Review in respect of non-Irish nationals' (EEA nationals and non-EEA nationals) access to social housing services. In this review, two out of the four Local Authorities reported that they no longer use the Housing Circular as the basis for housing assessments, and two Local Authorities said that this was currently under review.

We know from our engagements within the National Roma Network that there are significant inconsistencies in how Local Authorities apply the Housing Circular with some reportedly applying the Circular to all housing supports, including emergency homeless accommodation. Given that the Housing Circular is significantly out of date (for example it refers to repealed legislation and omits a wide range of eligible households), it is important to extend IHREC's equality review of the Housing Circular at a national level to ensure a consistent approach across all Local Authorities. Nothing in EU Law prevents Union citizens benefiting from more favourable national provisions nor does it prevent the use of discretionary powers²⁰. Local Authorities must operate their procedures and apply legislation in compatibility with EU Law and in line with the Public Sector Equality and Human Rights Duty²¹.

Case Four: Application of Housing Circular - Social Housing List

There is a Roma family of 5 (two parents, their two children and their adult son with a disability) who were living in a mobile home near Enniscorthy, Co Wexford. They contacted the Roma Project in Enniscorthy to support them to apply for social housing with Wexford County Council.

The family has been supported by the project to complete and send all the necessary forms and submit all the necessary evidence. It was challenging to provide all the evidence they needed. The family were not on the housing list since they were not employed and hadn't worked for 52 weeks in Ireland. They were living in the mobile home for two years. The project contacted TUSLA but they told us they cannot help us since this is a housing crisis situation. We learned that the housing circular 41/2012 is a barrier for the Roma Community to get on the housing list.

With continuous advocacy from the Roma project and collaboration with the Local Authority, the family were finally supported to complete a housing assessment and have been accommodated. This shows that cases such as this can be resolved positively through Local Authorities using their capacity to dis-apply Housing Circular 41 and using their discretionary powers under the Housing Acts.

Roma Project, Ferns Diocesan Youth Service, Wexford

¹⁹ IHREC (2020) Annual Report <https://www.ihrec.ie/documents/annual-report-2020/>

²⁰ Article 37 Directive 2004/38/EC

²¹ IHREC (2014) Irish Human Rights and Equality Commission Act 2014 https://www.ihrec.ie/app/uploads/2022/08/ihrec_act_2014.pdf

2.4. Family Experiences of Homeless Services

Roma families face additional barriers in their access to, and journey through homeless services. Making initial contact with services remains challenging. Roma report being advised to stay with family or friends, difficulty producing the paperwork required for an initial assessment, and barriers to understanding the process due to lack of interpreter services. This can be particularly problematic when families have small children and they are not accommodated. There are serious concerns about the welfare of Roma children who can be forced to sleep rough, in cars, or in overcrowded and unsafe accommodation due to the inability to access emergency shelter and humanitarian supports.

Life in emergency accommodation also brings challenges. Members of the National Roma Network report that Roma families can be split into two different locations (separating the male partner from spouse and children) sometimes without a valid reason or an explanation. Move on from homeless accommodation is also often difficult due to over-reliance on the private rented market, and larger family size. While this is not unique to Roma households, such experiences intensify the already evidenced deep inequalities faced by Roma. This leaves Roma children particularly vulnerable to the long term physical and mental health impacts of homelessness²².

Case Five: Lack of Supports for Roma Families Rough Sleeping

A Roma family of three, moved to Ireland at end of July. Initially staying with friends and family, they had no ability to communicate in English. Parents were working/seeking employment and 16 year old daughter has a disability. The family began rough sleeping at around the time they presented to Crosscare on 14th of September.

The family initially came to Crosscare seeking support with payment and social housing applications. Crosscare contacted the Dublin Regional Homeless Executive Central Placement Service who referred them to the Family Support Team ("FST"). The FST asked for them to be referred to Focus Ireland, however, out of hours support was required which is not provided to families. The family repeatedly reported to Mountjoy and Sherrard Street Garda Station over the following days seeking a place of safety but they were not allowed to stay there either.

Dublin Simon Outreach team, who stated they also do not work with families rough sleeping, was however able to confirm the family unit was sleeping in a car. On contacting the FST, Crosscare was asked to contact Fingal County Council in order to get a homeless assessment completed. Fingal County Council were contacted multiple times with no response over 3 days with the family continuing to sleep rough. Senior management of Fingal County Council was finally contacted on the 27th September in order to get the family a homeless assessment with no reply. Crosscare later discovered that the family was accommodated and an assessment recorded on the PASS system with no communication from the Local Authority to Crosscare. The Family was finally accommodated on 27th of September.

Conclusions:

²² 25% increase in the risk of severe physical and mental ill-health and disability during childhood and early adulthood if a child experiences poor housing. Royal College of Physicians (2019) The Impact of Homelessness and Inadequate Housing on Children's Health <https://rcpi-live-cdn.s3.amazonaws.com/wp-content/uploads/2019/11/Impact-of-Homelessness-full-position-paper-final.pdf>

- Lack of interpreter supports prolonged the time the family was rough sleeping.
- It took contacting senior management in a Local Authority to get a same day homeless assessment.
- Huge barriers to getting an assessment for Roma families as there is no dedicated Family Outreach or Family Out of Hours service. A 9-5 service without the ability to provide a timely homeless assessment and to update PASS, completely fails families who are rough sleeping.

Crosscare Housing and Welfare, Dublin

Case 6: Impacts of Homelessness on Roma Children

*There were three Roma families forced to move out of **Town A** in June, 2021. The families could not find accommodation in **Town A** after they received an eviction notice from their landlord. The families found accommodation in **Town B** but they did not receive a rent agreement or rent book for their new accommodation. The families emphasised that the accommodation in **Town B** is only temporary, so they have no assurance that they won't be asked to move out tomorrow.*

*In the middle of September 2021, the Roma Health Project Worker was approached by the Home School Liaison Teacher from **Town A** in relation to the Roma families. The families found that it is too complicated to enroll the children in the schools in **Town B**, the parents could not follow the school enrollment procedures or places were not available in the schools. The families were looking for support with transport so that the 9 children could attend the schools in **Town A** where they had been attending. At that time the families still were looking for accommodation in **Town A** with great hopes. The families were advised that the Department of Education and Skills will not provide transport unless it is to nearest school.*

Outcomes: *The following were the outcomes for the children concerned:*

- One child become an early school leaver (16-year-old)*
- Three children started in schools in the end of October, 2021 so they missed 8 weeks of school and they missed the beginning of the new school term*
- Two children (sixth class) only started school at the end of November, 2021 so they missed 12 weeks of school.*
- Two children started pre-schools in February, 2022 having missed out on 5 months of valuable early childhood education putting them at further disadvantage.*
- One child (fifth class) started school only in March, 2022. This child missed 6 months of school at a critical time in the senior cycle of primary school and has had to cope with entering a class where friendships have formed.*

*To note: enrolling children to schools in **Town B** does not mean that children will stay in those schools for long as their accommodation in **Town B** is only temporary, with no rent books (which is a legal requirement) or rent agreements the families have no security of tenure.*

Roma Health Project, Youth Work Ireland, Tipperary

3. Conclusion and Recommendations

3.1. A Coordinated Policy Response

The State currently does not have a coordinated response to address housing issues faced by Roma families in Ireland. Although housing is one of the key concerns for Roma, the National Traveller and Roma Inclusion Strategy does not include any actions on Roma accommodation. Currently, there is no nominated person/s within the Department of Housing, Planning, and Local Government with responsibility for Roma housing, or any dedicated workers at the Local Authority level.

*Housing for All*²³ - a New Housing Plan for Ireland, was released in September 2021 and has an overall ambitious goal of ending homelessness in Ireland by 2030. The government plans to achieve this by increasing social housing delivery and supporting social inclusion. The strategy contains a number of actions across government departments and agencies, including the establishment of a National Homeless Action Committee to examine the complex individual health and family circumstances that contribute to homelessness. While it is welcome that the Strategy explicitly recognises Roma are overrepresented within the homeless population in Ireland, it does not include any specific actions or measures to address Roma homelessness.

3.2. Ethnic Equality Monitoring and Further Research

The true extent and impact of the housing crisis on the Roma community is unknown. In fact, we do not know the percentage of Roma who are homeless in Ireland. This is because the State does not collect ethnic data in relation to accommodation and specifically Local Authorities do not gather this information, which is necessary for ethnic equality monitoring of housing policies and services. Only through reliable data can the specific needs of Roma be assessed and adequate responses be designed to promote equality. The collection of ethnic data must be conducted within a human rights framework with clear guidelines and training for staff on the collection and use of this data.

4. The National Roma Network Recommends the Following Actions

The National Roma Network asks the Department of Housing, Planning and Local Government to build on the welcome references to Roma and Roma homelessness in the *Housing For All* policy, by naming Roma as a priority group in mainstream housing/homeless strategies and ensuring that the needs of Roma are met through clear targets, actions, and resources. We also urge the NTRIS steering committee to prioritise the inclusion of accommodation actions in the National Traveller and Roma Inclusion Strategy (NTRIS) to address the Roma accommodation and homeless crisis in line with targets identified in the EU Roma Strategic Framework 2020-30.²⁴ Suggested actions include:

²³ Dept Housing, Planning, Local Government (2021) *Housing for All* <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

²⁴ Targets set out in the EU Roma Strategic Framework: Cut the number of Roma sleeping rough and using emergency accommodation in half by 2030, Cut Roma overcrowding in half by 2030, Ensure 95% of Roma have access to tap water in their dwelling by 2030, Reduce Roma accommodation deprivation by 1/3 by 2030

- Appoint a Nominated **Person/s within the Department of Housing, Planning and Local Government** to lead implementation of Roma accommodation actions in NTRIS
- Implement **ethnic equality monitoring**, including the introduction of a standardised ethnic identifier in line with the national census, across all statutory and voluntary housing and homeless datasets. This includes datasets for allocations of social housing, and on homelessness.
- **Local Authorities to review all housing and homeless support processes through an equality lens** considering the State's legal obligations under the Public Sector Equality and Human Rights Duty, and the disproportionate impacts of the housing crisis on ethnic minority groups, including Roma.
- Provide **emergency humanitarian supports**, including shelter, to vulnerable Roma families. (Provision of emergency homeless accommodation is specified in primary legislation and therefore the Housing Circular 41/2012 should not apply).
- **Review and update the application and provisions of the Housing Circular 41/2012** across all Local Authorities as a barrier to Roma families accessing adequate social housing and housing support, considering the findings of IHREC's Equality Review of Non-Irish Nationals Access to Local Authority Accommodation Services in Dublin Local Authorities²⁵.
- **Review the impact of other regulatory barriers**, including the Habitual Residence Condition which prevent many Roma from accessing social protection payments, emergency accommodation, and domestic violence supports.
- Homeless service providers to have **dedicated liaison staff for Roma** who can build knowledge, relationships and trust with the Roma community.
- To address the issue of Family rough sleeping (which is impacting Roma families), establish an **Out of Hours Family Outreach Homeless Service**.
- Provide **appropriate interpreter services** within statutory and voluntary housing and homeless services where and when needed.
- Train housing workers and officials in **anti-racism and discrimination training (inclusive of anti-Roma racism)**, and use of interpreters.
- **End the practice of separate accommodation** of parents from children in the absence of valid reasons. The reasons for separation should always be stated clearly
- Work collaboratively with HSE and Department of Health to **address the current and emerging Roma health inequalities that are compounded by homelessness**

5. Examples of Positive Practice

Through our experience in the National Roma Network, working directly with and for Roma, we have seen examples of collaborative practice which resulted in better outcomes for the community. The key elements highlighted in these case examples are:

Collaboration Based on Community Development Principles: State agencies, working in collaboration with the Roma community, Roma workers, and organisations working with Roma, means that the specific needs and experiences of Roma inform an appropriate and coordinated response based on the principles of participation, inclusion and empowerment.

²⁵ IHREC (2021) Annual Report 2020n www.ihrec.ie/documents/annual-report-2020/

Human Rights and Equality Framework: All public bodies in Ireland have a legal obligation to promote equality, prevent discrimination and protect human rights under the Public Sector Equality and Human Rights Duty. To meet the core requirements of the Duty, public services must assess, address and report on any equality and human rights issues that are within their purpose and function. This provides a clear framework for assessing and responding to Roma accommodation needs and other related inequalities experienced by Roma in Ireland.

Case 7: Example of Positive Practice - Roma Health & Accommodation Pilot Project

A collaborative Roma Accommodation and Health project has recently been established between Youth Work Ireland Tipperary (who manage the Tipperary Roma Health Project), HSE Social Inclusion Mid-West, Social Inclusion South East, and Tipperary County Council. This is a one year, pilot project funded by the HSE National Social Inclusion Office. The first stage of the project will support Local Authority Senior Managers to receive a 3-hour training on the Public Sector Equality and Human Rights Duty and a workshop on implementing an equality and human rights approach to their work. A cross-level Working Group will then be set up within the Local Authority to undertake an assessment of the equality and human rights issues in relation to Roma and accommodation. A subgroup of the Roma Health Project Interagency Steering Committee will engage in a parallel process with respect to Roma and health. A Roma Accommodation and Health Worker will support the operation of the pilot as well as undertaking a housing and homeless needs assessment in respect of Roma in Tipperary. This project aims to

- Work collaboratively to prevent homelessness through enhancing access to services by Roma living in insecure or unsafe accommodation
- Collaborate to develop integrated pathways of care to support Roma experiencing homelessness as well as those living in insecure or unsafe accommodation
- Provide targeted supports to Roma in insecure or unsafe housing to improve their access to health services and health information (including Covid-19 appropriate responses)
- Identify good practice and apply it in Tipperary and then share learning, outputs and outcomes with other CHO areas and Local Authorities

Roma Health & Accommodation Project, Tipperary Youth Work Ireland

Case 8: Example of Positive Practice - The COVID-19 Response for Vulnerable People (CRVP) service

was opened in May 2020 by HSE Social Inclusion CHO7, in collaboration with NGO partners and remained open for a year and half. This service aimed to support vulnerable populations who could not safely self-isolate during the COVID 19 pandemic. The service was established in a central Dublin location, and later expanded to include a second facility due to demand. The majority (80%) of service users were members of the Roma community. This project highlighted the benefits of a collaborative approach between State agencies and NGO partners - ensuring clear referral pathways and a holistic model of care for Roma that used this service. This on-site, multi-disciplinary, multi-agency approach meant that within 2 weeks or less, people's health, housing and social care needs were identified, entitlements established, service pathways identified and people familiarised with them. All partners involved in this project called for this collaborative approach to continue post the COVID crisis and incorporated into long term policy measures and strategic planning.

HSE Dublin South Kildare and West Wicklow (DSKWW) Social Inclusion and key NGO partners (Cairde, Crosscare, Focus Ireland, Pavee Point, and Safetynet Primary Care

Appendix 1: Participants within the National Roma Network

Bradog Youth Service
Cairde
Capuchin Centre
City of Dublin Education and Training Board (CDETb)
Clare Local Development Company (CLDC)
Cope Galway
County Kildare LEADER Partnership
Cork Traveller Visibility Group
Crosscare
Daughters of Charity
Donegal Travellers Project (DTP)
Dublin City Community Co-op
Dublin North East Inner City (NEIC)
Dublin Simon Community
Fern Diocese Youth Service (FDYS)
Focus Ireland
Foroige, Roscommon
Free Legal Advice Centre (FLAC)
Galway City Partnership
Longford Community Resources
Mendicity
Musicantia
New Communities Partnership (NCP)
Pavee Point Traveller and Roma Centre
South Dublin County Partnership
South Roscommon Family Resource Centre
U Casadh
Waterford and South Tipperary Community Youth Service (WSTCYS) Intercultural Health Hub
Youth Work Ireland Tipperary