



Civil society monitoring report:
Lessons learnt from implementation
of the National Traveller and Roma Inclusion
Strategy 2017-2021, and recommendations
for the post-2022 strategy
in Ireland

Prepared by:
Pavee Point Traveller and Roma Centre
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and Roma Inclusion Strategy 2017-2021,
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LIST OF ABBREVIATIONS

CSO	Central Statistics Office
DCEDIY	Department of Children, Equality, Disability, Integration, and Youth
ESRI	Economic and Social Research Institute
HAP	Housing Assistance Payment
HEA	Higher Education Authority
HRC	Habitual Residence Condition
HSE	Health Services Executive
NGO	Non-Governmental Organisation
NTHAP	National Traveller Health Action Plan
NTRIS	National Traveller and Roma Inclusion Strategy

EXECUTIVE SUMMARY

The report reflects the current situation which pertains in Ireland insofar as the National Traveller and Roma Inclusion Strategy (NTRIS) 2017-2021 and associated activities remain applicable, along with the current NTRIS Steering Group, until the publication of a commissioned review of the Strategy which is expected to be completed by the end of 2022.

The 'National Traveller and Roma Inclusion Strategy 2017-2021' (NTRIS) is the national strategy for Roma and Traveller inclusion and the first national policy framework to explicitly include Roma as a key focus in Ireland.¹ Ireland continues to implement the activities defined in the Strategy while reviewing it and planning its successor. This is currently under development, with a commitment to taking a more outcome-focused approach. The NTRIS is ambitious and has significant potential to improve the situation and experience of Travellers and Roma in Ireland.

A number of identified implementation challenges require attention and the next iteration of the Strategy needs to address these issues to improve the situation and experience of Travellers and Roma in Ireland:

- **Resourcing of the Strategy:** commitments have been made by the NTRIS lead department (Children, Equality, Disability, Integration and Youth) to secure resources for the implementation of the Strategy in 2022 (5.659 million EUR for 2022; an increase of 734,000 EUR). However, it is critical that other government departments identify and allocate adequate resources to support the implementation of their allocated activities.
- **Leadership and operational structures:** there is a need for increased administrative support for the NTRIS Steering Group and an implementation approach that ensures cross-departmental implementation of the Strategy.
- **Strategy monitoring framework:** the current NTRIS lacks a rigorous monitoring and evaluation framework: critically, there is a need for a comprehensive set of outcome indicators to track progress. Monitoring is further hampered due to the lack of specificity concerning some of the activities; the underestimation of the number of tasks associated with specific activities, thus delaying their implementation; the lack of named leads for some activities; and the absence of timelines for implementation.

Implementation plan: the NTRIS lacks an implementation plan and there is a need for every department/agency to develop an implementation plan regarding the activities associated with their areas. Activities that are longer-term in nature need to have specific delivery milestones, rather than simply being described as 'ongoing'.

Participation

The consultation process on the development of the NTRIS 2017-2021 was robust and involved Traveller and Roma representative organisations. Eleven Traveller/Roma organisations are represented on the NTRIS Steering Group, including all of the national Traveller organisations. Active Roma participation and involvement in policy development is very underdeveloped and there is limited local-level infrastructure in this regard.

¹ [Department of Justice and Equality, National Traveller and Roma Inclusion Strategy, 2017 – 2021.](#)

Relevance

Significant inequalities persist for Travellers and Roma across key domains: accommodation, health, education, and social protection. While a number of NTRIS activities have the potential to address these inequalities, a significant number of them are yet to be completed. In addition, in the absence of annual implementation targets, it is difficult to measure their progress. A further issue in this regard is the NTRIS traffic-light reporting framework, which is an ineffective tool for monitoring implementation progress. The NTRIS progress reports contain frequent references to activities being “on track”; however, what is deemed ‘on track’ is open to the interpretation of the implementing department/agency. A further concern is a lack of ownership of and reported progress with a number of important activities that require action by “all departments”. These issues must be addressed in the new Strategy.

Expected effectiveness

The NTRIS 2017-2021 is a cross-government strategy, led by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY). Concerns have been raised, however, about the limited authority which one government department has to drive policy outcomes that are the responsibility of another government department. In addition, in the current Strategy, there are twenty-two activities for which no named lead department/agency is identified. The new Strategy requires fewer activities (annualised activities) that have the potential to achieve tangible outcomes for Roma and Travellers in key domains. At the strategy design stage, lead departments/agencies should be provided with a framework to develop an implementation plan for the activities they have responsibility for.

Alignment with the EU Strategic Framework

The current NTRIS (2017-2021) contains both mainstreaming and targeted activities, a number of which address the diversity of groups: women, children, young people, Traveller and Roma LGBT people, and disabled Travellers and Roma.

The NTRIS substantively aligns with the horizontal measures and substantive policy areas of the 2020 EU Roma Strategic Framework. One gap, however, is the absence of targets and related indicators, which needs to be addressed in the NTRIS post-2022.

INTRODUCTION

National Roma strategic framework

Although we recognise Roma as an umbrella term, throughout this report we refer to 'Travellers' and 'Roma' to clearly identify the distinct situation, identity, and experience of the Roma and Traveller² communities in Ireland. There are approximately 36,000 Irish Travellers living in Ireland.³ In 2018 it was estimated that approximately 5,000 members of the Roma community were living in Ireland.⁴

In 2020, the 'Programme for Government'⁵ committed to a review of NTRIS 2017-2021 and to developing a successor strategy that has a stronger outcome-focused approach. In 2022, the lead department (Children, Equality, Disability, Integration, and Youth) proposed a tripartite evaluation of three relevant equality strategies, all of which concluded in 2021, before commencing work to develop a new NTRIS: the NTRIS 2017-2021; the 'Migrant Integration Strategy'; and the 'National Strategy for Women and Girls'. This evaluation is now underway and should be published by the end of 2022. While the outcome of the review will inform the development of a successor strategy, no date has been designated for the publication and implementation of the next NTRIS.

Key lessons from the existing NTRIS and its monitoring process must be taken into consideration in the development and publication of the next NTRIS, including a review of the processes, implementation, and monitoring structures.

About this report

The monitoring report was prepared by Pavee Point Traveller and Roma Centre, based on desk research that gathered data and information from the most up-to-date sources available, including: Census 2016; research reports conducted by the Economic and Social Research Institute; data provided by government departments; submissions to government on behalf of Traveller and Roma organisations; and progress reports on the implementation of NTRIS activities from the relevant implementing agencies and departments to the NTRIS Steering Group. Information was also gathered using the well-developed Traveller and Roma infrastructure and associated networks, including the 'National Traveller and Roma Inclusion Strategy Steering Group'.⁶

² Travellers were formally recognised as a distinct minority ethnic group in Ireland in 2017. This followed over thirty years of campaigning for this formal recognition.

³ The Census 2016 enumerated 30,987 Travellers living in Ireland. This is lower than the 36,244 identified by the All-Ireland Health Study; see Kelleher et al., *Our Geels All Ireland Traveller Health Study* (Dublin: University College Dublin and Department of Health and Children, 2010).

⁴ Pavee Point Traveller and Roma Centre & Department of Justice and Equality (2018). [Roma in Ireland: A National Needs Assessment](#), p. 42.

⁵ [Programme for Government: Our Shared Future](#), p. 77.

⁶ The methods that were used were appropriate for the period of review of the existing NTRIS, including the examination of independent research undertaken by the three National Traveller Organisations.

1. PARTICIPATION

1.1. Traveller and Roma participation in the NTRIS preparation

In 2015, an NTRIS Steering Group was established to oversee the development and implementation of the NTRIS 2017-2021. Members of the group include department officials from all relevant Departments, and Traveller and Roma civil society organisations. The consultation process on the development of the NTRIS 2017-2021 was robust and involved three phases: 1) an open call for responses (from Traveller and Roma representative organisations and other NGOs) to a proposed list of strategy themes; 2) Traveller and Roma communities and other interested parties were invited to give their input about a set of proposed priority, high-level objectives for the NTRIS; and, 3) a series of public consultations and calls for submissions were implemented to identify responses to the priorities established in the initial consultation phases.

1.2. Traveller and Roma participation in NTRIS implementation, monitoring, and evaluation

Eleven Traveller / Roma organisations are represented on the NTRIS Steering Group, including all of the national organisations. A number of these organisations are also involved in the delivery of activities in the NTRIS.

As part of a process to discuss the key elements of the NTRIS which need to be pursued in the post-2022 strategy, Traveller/Roma organisations made the following observations about the NTRIS implementation and monitoring and their involvement in these processes:

- Effective collaboration is a complex process and involves building trust, sharing information, and identifying goals.
- There is a need to invest in Traveller and Roma infrastructure.
- NTRIS meetings should be a place where civil/public servants can be comfortable talking about the obstacles or resistance they face progressing with their work. An environment where frank discussions can take place should be created.
- Cross fertilisation with other national committees that deal with gender equality and anti-racism has been useful, and more work like this should be done.⁷

1.3. System of policy consultation with civil society and stakeholders

The policy development process in Ireland is variable, but in many instances seeks to secure the involvement of civil society stakeholders. Relevant systems and processes in this regard involve: calls for submissions and/or focus groups by the relevant departments/agencies on proposed policies and strategies; invitations to attend and give input to Oireachtas (parliamentary) debates; and representation of civil society stakeholders in structures designed to advise and/or monitor the implementation of national strategies. However, many of these structures act as advisory rather than decision-making entities.

While the approach to consultation is generally positive, a significant gap remains with regard to the implementation of policy as it relates to Travellers and Roma. Further, there is an urgent need for robust consultative and institutional mechanisms for key policy and service development drivers. One example of this is Traveller health policy: the national statutory structure for developing and driving measures to improve Traveller

⁷ Note from NTRIS Representatives meeting 14 October 2021.

health outcomes (the 'National Traveller Health Advisory Committee') has been dormant since 2012. Despite the commitment by the former Minister for Health to re-establish the Committee in the first quarter of 2018, and in the context of the significant health inequalities of the Traveller community, no additional development funding has been allocated to Traveller health, including in the most recent budget.

Concerning policy consultation with the Roma community in Ireland, given that the community is small and very marginalised the voice and involvement of Roma in policy development are very underdeveloped. While Pavee Point Roma and Traveller Centre works at the national level, at the local level there is limited civil society infrastructure that enables the raising of issues of concern. There have been some welcome developments in this area, however: in particular, the inclusion of four new Roma representatives on the NTRIS Steering Group and the further development and expansion of the National Roma Network, established in 2019 by Pavee Point Traveller and Roma Centre.

1.4. Empowerment of Traveller and Roma communities at the local level

The NTRIS 2017-2021 thematic area "Traveller and Roma Communities" contains three activities of relevance to the empowerment of Roma communities. Action 132: involving voter education and voter registration initiatives for the Traveller and Roma communities; Action 133: involving the development of mentoring programmes to build and develop the capacity of Travellers and Roma to represent their communities at a local, national and international level; and Action 139: involving the provision of support [...] to increase Traveller civic involvement in their own communities and local areas.

The progress reports completed under NTRIS indicate the following regarding the delivery of these activities:

Action 132: while the Department of Housing, Planning, Community and Local Government consulted with Traveller groups on a new Electoral Reform Bill, it is not clear whether and how these consultations were reflected in the forthcoming Bill.

Action 133: no new initiatives have been developed to deliver on this action. Action 139: no information has been provided by the Department of Housing, Planning, Community and Local Government regarding this action.

1.5. Capacity-building of Traveller and Roma civil society

The NTRIS contains a thematic area "Traveller and Roma Communities" which includes three activities aimed at building the capacity of Traveller and Roma civil society. The Department of Children, Equality, Disability, Integration and Youth is the lead for these activities, which involve the provision of funding to local and national Traveller and Roma organisations and initiatives based on community development principles. A Roma Women's Advocates initiative is being funded as part of these commitments, involving the development of a group of Roma women as peer advocates for their community. These initiatives have been useful but require consolidation and reinforcement in the next NTRIS.

2. RELEVANCE

2.1. Fighting anti-Traveller and anti-Roma racism and discrimination

Long-established and ongoing research highlights the need to address anti-Traveller and Roma racism in Ireland. For example, a 2020 survey by the EU Fundamental Rights Agency found that within the twelve months prior to the survey, 52% of Traveller respondents reported having experienced hate-motivated harassment and 7% had experienced hate-motivated physical assault.⁸ Attitudes towards Travellers and Roma remain very negative among the Irish general public. In a national survey from 2017, 91% of the general population said they would not want a Traveller or Roma marrying into their family; 75% would not accept a Traveller as a colleague; and 35% would avoid Travellers and 37% would avoid Roma.⁹ In the 2018 National Roma Needs Assessment, 81% of Roma respondents reported that they had felt discriminated against on the street or in a public setting.¹⁰

The number of complaints instigated on the grounds of being a Traveller under the Equal Status Acts¹¹ 2000-2015 has fallen despite persistent levels of discrimination in accessing services and goods: the number of Travellers opening cases under the Act fell by 47% between 2019 and 2020.¹² While it is acknowledged that Travellers are significantly underrepresented in terms of employment, the number of discrimination complaints under the Employment Equality Acts 1999-2015 is extremely low (only six cases opened in 2020),¹³ despite clear indications of ongoing and persistent discrimination in this field.¹⁴

The 2020 EU Fundamental Rights Agency's 'Roma and Travellers Survey' found that despite high levels of awareness among Travellers and Roma of laws against discrimination, significant under-reporting occurs, with only 28% of respondents having filed a complaint in connection with discrimination they had experienced.¹⁵

The NTRIS contains 17 activities under the theme of anti-discrimination and equality: six mainstreaming activities and 11 targeted ones. The majority of these activities are ongoing in nature (five are one-off activities).

The March 2022 Progress Report on NTRIS indicates that of these 17 activities, one has been completed, one is stalled, and the remaining 15 are noted as "on track"; of the five 'one-off' activities, one has been completed. Two of the seventeen anti-discrimination/equality activities under the NTRIS are significant in terms of their potential to address issues broadly and at the system level:

Action 111: The Department of Justice and Equality will review the Prohibition of Incitement to Hatred Act 1989.

⁸ EU Agency for Fundamental Rights (2020). [Roma and Travellers in Six Countries](#), p. 35.

⁹ Behaviour and Attitudes, 'Traveller Community National Survey 2017', pp. 99-105.

¹⁰ Pavee Point Traveller and Roma Centre & Department of Justice and Equality (2018). Op cit., p. 12.

¹¹ The Equal Status Acts 2000-2015 prohibit discrimination in the provision of goods and services, the provision of accommodation and access to education.

¹² Workplace Relations Commission [Annual Report 2020](#), p. 23.

¹³ Ibid, p. 23.

¹⁴ Mullen R., Kelly B., & Crowley N., Mincéir Misl'er a Tom Tober - [Travellers in Mainstream Labour Market](#), St. Stephens Green Trust, 2021.

¹⁵ EU Agency for Fundamental Rights (2020). Op cit.

Progress: In 2021 the General Scheme of the Criminal Justice (Hate Crime) Bill was introduced. Traveller and Roma representative organisations have called for the Bill to be strengthened in a number of areas¹⁶ and recommend that the forthcoming National Action Plan Against Racism contains specific measures to strengthen the effective use of new anti-hate crime legislation in relation to addressing individual and systemic racism.¹⁷

Action 125: Ireland (via the Department of Justice and Equality) will implement CERD Committee's General Recommendation XXXI on the prevention of racial discrimination in the criminal justice system with a focus on data collection by an independent body for the purposes of identifying trends in racial discrimination.

Progress: This action stalled during the COVID-19 pandemic and no update about this action has been provided to NTRIS since before March 2020.

It is important that the next iteration of NTRIS aligns with and builds in key activities linked with the forthcoming National Action Plan Against Racism and the EU Anti-Racism Action Plan 2020-2025.

2.2. Education

The entrenched education equality gap between Traveller children and non-Traveller peers persists. Data from the 2016 Census indicate the following: 13% of Traveller females are educated to upper secondary level or above compared with 69% of the general population; 57% of Traveller males are educated to at most primary level compared to 13.6% of the general population; and just 0.2% of all new entrants to tertiary-level programmes are young Travellers.¹⁸

Roma children in over 70% of Roma households attend primary and post-primary school.¹⁹ However, significant challenges to their participation in education were identified, with poverty and poor living conditions acting as significant barriers to children's educational attainment. In 25% of households, it was reported that children have gone to school hungry and 57.5% of families could not afford books and school uniforms.²⁰

These general Census data mask a situation that is somewhat improving regarding education outcomes for younger Travellers. A more detailed breakdown of the Census 2016 statistics reveals that a low education level is more indicative of the older population. In the younger age bands, there has been progress: for instance, of Travellers aged 20-24 years 22% had left school with at most primary level; almost 30% had completed lower secondary level; a further 16% had completed upper secondary; and over 1% had completed a further or higher education course. This is evidence that investment in supporting the education of Travellers has some impact; however there is clearly still a wide gap to overcome before parity with the average education level of the population is achieved, and there is an urgent need to close this gap.

During COVID-19-related school closures, information from Traveller and Roma civil society organisations indicated that Traveller and Roma children were experiencing

¹⁶ Submissions on the Bill by Traveller and Roma organisations is contained in the following parliamentary report: Joint Committee on Justice (April 2022). [Report on Pre-legislative Scrutiny](#) of the General Scheme of the Criminal Justice (Hate Crime) Bill 2021.

¹⁷ Ibid.

¹⁸ [Central Statistics Office, 'Profile 8 - Irish Travellers Ethnicity and Religion – Census 2016 Results' \(Press Statement\) \(2017\).](#)

¹⁹ Pavee Point Traveller and Roma Centre & Department of Justice and Equality (2018). Op cit. 110.

²⁰ Ibid, p. 115.

adverse impacts including: lack of wi-fi/devices/electricity supply to enable participation in online learning; lack of study space due to overcrowding; lack of access to school-based mentoring, support, and homework clubs; lack of access to local community facilities with internet connectivity and study space; and parents being unable to assist with homework due to literacy and/or language barriers. For many Roma children, no longer having access to the free food schemes operating in primary schools meant missing a daily meal.²¹

Regarding the field of education policy, the NTRIS contains 20 activities:

- 14 activities under the theme of education: nine mainstreaming activities and five targeted ones;
- one mainstreaming activity under the theme of culture and identity;
- four mainstreaming activities under the theme of children and youth;
- one targeted activity under the theme of anti-discrimination and equality.

The majority of these activities are ongoing in nature. The NTRIS March 2022 Progress Report indicates that of these 20 activities five have been completed, and the remaining 15 are noted as "on track", although the interpretation of what this means is not always sufficiently clear.

The significant education equality gap between Travellers and non-Travellers requires a targeted national Traveller and Roma education strategy. A significant gap in the current NTRIS is the absence of an activity that commits the Department of Education to develop such a targeted policy approach. While the current 'Programme for Government' contains a commitment to developing this strategy, the Department of Education and Skills is yet to start developing it.²² However, some government departments have implemented targeted initiatives to address Traveller and Roma educational gaps, specifically in terms of early education and higher education. For example, the Department of Further and Higher Education, Research, Innovation and Science has developed and is committed to meeting higher-education participation-related targets for Travellers and Roma,²³ and DCEDIY is developing initiatives for Traveller and Roma children in early childhood education.

A second issue that needs to be addressed in the next iteration of the NTRIS emerged after the development of the current NTRIS. In recent years, a form of education marginalisation has emerged, with an increase in schools' use of reduced timetables (school hours) for some pupils. It has been reported that this practice is being disproportionately applied to Traveller students.²⁴

²¹ COVID-19 NGO Group (undated). [Marginalized Groups: promoting equality, inclusion, and human rights in the context of the COVID-19 crisis: a joint submission](#). Community Work Ireland, p. 18.

²² 2020 Programme for Government: Our Shared Future, p. 100.

²³ The [National Plan for Equity of Access to Higher Education 2015-2019](#) is the first time a national target was set for increasing Traveller participation in higher education and the next iteration of this Strategy will also include targets for Travellers and Roma. Additionally, the government published an [Action Plan for Increasing Traveller Participation in Higher Education 2019-2021](#)

²⁴ Houses of the Oireachtas, Joint Committee on Education and Skills: Report on the Committee's Examination on Progression of Travellers from Primary, to Secondary, and Third-Level Education (May 2019). This Report recommended that the Department of Education and Skills or Tusla collect data on the practice and develop a Statement Strategy for School Attendance and mandatory controls for Schools.

2.3. Employment

There is a significant employment equality gap between Travellers and Roma and the general population. Data from the national Roma needs assessment indicate that approximately 17% of Roma respondents are in employment.²⁵ Regarding the Traveller community, Census 2016 data indicate the following: the unemployment rate for Travellers is 80% (six times that of the general population); the labour force participation rate among Travellers is 57% compared with 61% for non-Travellers; and almost 1 in 8 (11%) of Travellers indicated they were unable to work due to a disability, nearly three times the equivalent rate for the general population (4%).²⁶ While the educational disadvantage is a key factor in Traveller underemployment, there are other factors at play. A key barrier is the impact of racism and discrimination on Travellers' pathway towards employment,²⁷ with Irish Travellers being ten times more likely than White Irish to experience discrimination when seeking employment.²⁸ Data from the Roma needs assessment indicate that 79% of Roma had experienced discrimination when seeking employment.²⁹

A further significant barrier for many Roma is related to the implementation of European Directive 2004/38 on the freedom of movement and residence and the Habitual Residence Condition (HRC). People from the Roma community who are unable to satisfy the HRC provisions are ineligible for state-funded support and payments, including those linked to further education and training and job-seeking.

Concerning the field of employment policy, the NTRIS contains 19 activities:

- 13 activities under the theme of employment: seven mainstreaming activities and six targeted activities,
- three activities under the theme of gender equality: two targeted and one mainstreaming activity,
- two activities under the theme of education: one targeted and one mainstreaming,
- one targeted action under the theme of children and youth.

The majority of these activities are ongoing in nature. The NTRIS March 2022 progress report indicates that of these 19 activities one has been completed, 14 are "on track", with an absence of detail about what this means, and there is no information about four activities.

A number of employment-related activities, if implemented, have the potential to improve equality outcomes for Travellers and Roma in the areas of further education and training and employment. In particular: Action 24 provides tailored support for the long-term unemployed; Action 25 targets measures to increase Traveller and Roma engagement with employment and training services; and Action 28 targets Travellers and Roma to promote undertaking internships in the civil and public service.

²⁵ Pavee Point and Department of Justice and Equality (2018). Op Cit., p. 75.

²⁶ Census 2016, [Profile 8: Irish Travellers Ethnicity and Religion](#).

²⁷ Watson, D., et al (2017). [A Social Portrait of Travellers in Ireland](#), Research Series No. 56, ESRI, 2017.

²⁸ Mc Ginnity, F., et al. (2017). [Who experiences discrimination in Ireland?](#): evidence from the Equality module of the QNHS equality modules. The Economic and Social Research Institute and the Irish Human Rights and Equality Commission, Dublin.

²⁹ Pavee Point and Department of Justice and Equality (2018). Op Cit., p. 51

The NTRIS progress report for March 2022 informs that Actions 24, 25, and 28 are “on track”. The progress-related information for Action 24, however, suggests that there is limited understanding of the provision of “tailored support” and what such support might look like. In the context of addressing specific issues for Travellers and Roma who are unemployed, it would be expected that such support would include specific attention to the unique situation, experience, and cultural identity of Travellers and Roma. The NTRIS progress reports from this Department, however, suggest that this is not the case. In their updates on Action 24, the Department of Social Protection notes that “Jobseekers including Traveller and Roma clients have access to the full range of JobPath activation measures and employment support provided in their local areas” and “all public employment services are available on a non-discriminatory basis to any jobseeker”.

Similarly, regarding Action 25 (targeted measures for increasing Traveller and Roma engagement with employment and training services), the Department of Social Protection advises that the 55 Community Employment schemes nationwide include Traveller and Roma participants. This, it is suggested, is “One of the Department’s principal forms of targeted and tailored support for members of the Traveller/Roma community”. However, there is no indication about what, if any, targeted approaches are being taken by these employment scheme implementers to attract Travellers and Roma, and, more critically, support their entry into employment.

As part of the NTRIS review, the government has committed to developing a comprehensive Traveller and Roma training, employment and enterprise Plan.³⁰ This commitment needs to be realised within the lifetime of the current ‘Pathways to Work’ Strategy (2021-2025). In this regard, a clear timeline, designated resources and a monitoring framework for this plan need to be prioritised by the NTRIS Employment Subgroup and included as an action in the post-2022 NTRIS.

2.4. Healthcare

Travellers and Roma continue to experience unacceptably poor health outcomes in comparison to the majority population. The 2010 All Ireland Traveller Health Study (AITHS) found that life expectancy for Traveller men is 15.1 years, and for Traveller women 11.5 years less than that of their counterparts in the majority population; the infant mortality rate in the Traveller community is over three times that of non-Travellers (14 per 1,000 live births, compared to 3.9 for non-Travellers); and the suicide rate among male Travellers is six times as high as that of non-Travellers, accounting for a staggering 11% of all Traveller deaths.³¹ While the findings of the AITHS were published in 2010, their veracity was later endorsed by a number of subsequent state surveys and research reports, including most recently by the EU Fundamental Rights Agency in its 2019 ‘Travellers in Ireland’ Survey.³²

The National Roma Needs Assessment found the following: 51% of Roma reported that their mental health was not good on more than 14 days of the previous month, and 33% said that their daily activities had been interrupted by mental health difficulties on all of the preceding 30 days.³³

³⁰ 2020 [Programme for Government](#): Our Shared Future, page 77. This is also a commitment by the Department of Social Protection, [Pathways to Work Strategy 2021 – 2025](#) (2021), page 12.

³¹ Kelleher et al. (2010). [All Ireland Traveller Health Study Our Geels](#). School of Public Health, Physiotherapy and Population Science, University College Dublin.

³² EU Agency for Fundamental Rights (2020). [Roma and Travellers in Six Countries](#).

³³ Pavee Point Traveller and Roma Centre and the Department of Justice and Equality (2018). Op cit., p. 96.

High levels of discrimination continue to define the experiences of Travellers and Roma who attempt to access healthcare services. Current data indicate that 71% of Roma reported experiencing discrimination when accessing health services, with women more likely than men to report feeling discriminated against.³⁴ Over 40% of Travellers reported that they were not always treated with dignity and respect when accessing health services and only 41% of Travellers had complete trust in health professionals compared to 82% of the national population.³⁵

Roma without financial means continue to be denied access to medical and healthcare benefits such as a medical card due to restrictions imposed by statutory regulations.³⁶ The Habitual Residence Condition (HRC) continues to pose a barrier to many Roma seeking to access state welfare and health-related benefits, as well as certain statutory-funded services such as domestic violence refuges. The impact of these regulatory barriers was noted in the findings of the 'National Roma Needs Assessment', with 39% of respondents reporting that they did not have a medical card.³⁷

The Traveller and Roma communities were significantly and disproportionately more affected by the COVID-19 virus than non-Roma/Travellers in terms of morbidity, mortality, and risk of contracting the virus.³⁸ The adverse social conditions experienced by these communities (in particular, overcrowding, poverty, chronic health problems, racism and discrimination, and for Roma, language barriers) contributed to the adverse COVID-19 impacts on these communities.³⁹

The long-awaited National Traveller Health Action Plan is yet to be published. In 2018, following robust consultation with Traveller representative groups, the HSE, and other key stakeholders nationally, a draft framework for an NTHAP was developed and submitted to the Department of Health. In March 2019, the HSE released an updated edited version of the 2018 draft. Concerns were raised by Traveller organisations that this new draft contained none of the recommendations from the 2018 consultations (which were reflected in the 2018 draft). The HSE committed to the development of a further draft of the NTHAP and this was submitted to the Department of Health for approval, with an anticipated publication date of the second quarter of 2020. While the onset of COVID-19 stalled this process, in its progress report to the NTRIS Steering Group in March 2022 the HSE advised that some further amendments to the NTHAP were required in light of planned healthcare reforms under Sláinte Care. To date, the NTHAP has not been published and the HSE advised at the recent NTRIS Steering Group meeting that there no date for the publication had been identified and that resources for the Plan would be sought in the HSE estimates process for 2023.

³⁴ Ibid, 53.

³⁵ Kelleher et al. (2010) op cit.

³⁶ If a person has no income [that is, no official "means" proven by an employment or social welfare record] they cannot be means-tested for a medical card.

³⁷ Pavee Point Traveller and Roma Centre and the Department of Justice and Equality (2018) op cit, 97.

³⁸ According to the Health Information and Quality Authority (HIQA), "Travellers (all ages and those aged 18-64 years) were noted to be at an elevated risk of infection, and in those aged 18-64 years there was an increased risk of severe disease (in terms of hospitalisation when considered as a proportion of cases, and hospitalisation, ICU admission and death when considered as a proportion of the population). Notably, these results are considered to underestimate the true prevalence, given limitations with the use of ethnic identifiers and the hard-to-reach nature of this population [...] Members of the Roma community were noted to have comparable rates of infection relative to the general population, but an elevated risk of severe disease across the outcomes assessed in those aged 18- 64 years (that is, hospitalisation, ICU admission and death). The results presented are considered to underestimate the true prevalence given the reliance on outbreak data and the hard to reach nature of this population" ([Evidence synthesis for groups in vaccine allocation group nine - those aged 18-64 years living or working in crowded conditions](#), 2021, pages 12-13).

³⁹ COVID-19 NGO Group (undated). Op cit.

Regarding the field of health policy, the NTRIS contains 42 activities:

- 35 activities under the theme of health (17 mainstreaming activities and 18 targeted),
- four activities under the theme of children and youth (two mainstreaming activities and two targeted),
- three activities under the theme of gender equality (two mainstreaming activities and one targeted).

The majority of these activities are ongoing in nature. The NTRIS March 2022 progress report identifies that of these 42 activities two have been completed and the remainder are identified as 'on track'.

Two health activities which have significant potential to improve health outcomes for Travellers and Roma are Action 73, which commits the Health Service Executive (HSE) to develop a targeted Traveller health action plan using the social determinants of health approach; and Action 78, which commits the HSE to develop primary healthcare projects for Roma based on the Traveller Primary Healthcare Project model, informed by the findings of the 'National Roma Needs Assessment'.

Regarding Action 73, it is of particular concern that a long-awaited national Traveller Health Action Plan (NTHAP) has yet to be published by the HSE, as noted above.

Action 78 has significant potential to support Roma's access to mainstream health services through a peer-support health model delivered at the local level and based on the successful peer-support model for Traveller health. The COVID-19 pandemic, however, stalled the delivery of this initiative, and it was identified that pre-development support was needed to support Roma to become peer health workers. However, as a result of COVID-19 and the recognition of the urgent need to address Roma health inequalities, a positive development in this area is a commitment by the HSE to resource and fund health-worker Roma.⁴⁰ This model is at an early stage of development and will require a nationally coordinated approach based on the social determinants of health and strong links with mainstream services.

2.5. Accommodation, essential services, and environmental justice

The ongoing housing and homelessness crisis in Ireland creates the backdrop to the lack of progress addressing Traveller and Roma accommodation needs. A recent report on Traveller homelessness found that Travellers are almost eight times more likely (than non-Travellers) to live in overcrowded accommodation.⁴¹ A report issued by the ESRI in 2018 notes that while Travellers represent less than 1% of the Irish population, they constitute approximately 9% of the homeless population.⁴² However, applying the European Typology of Homelessness and Housing Exclusion (ETHOS) indicates that 39% of Travellers in Ireland effectively experience 'hidden homelessness' due to overcrowded living conditions.⁴³ The estimated number of Traveller families living on the side of the

⁴⁰ HSE (2022) [National Service Plan 2022](#), p. 52.

⁴¹ Pavee Point Traveller and Roma Centre (2021). *The Traveller Community and Homelessness: Advocacy Paper*. Pavee Point Traveller and Roma Centre.

⁴² [Grotti, R. Russell, H. Fahey, E. and Maitre, B \(June 2018\). Discrimination and Inequality in Housing in Ireland.](#) The Irish Human Rights and Equality Commission and the Economic and Social Research Institute, 62.

⁴³ Pavee Point Traveller and Roma Centre (2021). *The Traveller Community and Homelessness: Advocacy Paper*. Pavee Point Traveller and Roma Centre.

road in 2019 was 529. This figure remains largely unchanged from 2016 (when 536 families were thus identified).⁴⁴

The 'National Roma Needs Assessment' found that 20% of Roma were living in extreme poverty, in sub-standard accommodation, often without basic amenities (12.4% did not have a kitchen, 9.6% did not have a cooker, and 13.5% did not have a fridge).⁴⁵ Forty-four per cent of the Roma respondents of the needs assessment said they were living in overcrowded conditions.

Regarding the housing and accommodation policy field, the NTRIS contains six activities (one mainstreaming action and five targeted). Three of these activities are ongoing and two are one-off in nature. The NTRIS March 2022 progress report identifies that of these six activities one has been completed and the remainder are identified as "on track".

The NTRIS housing and accommodation activities are primarily focused on improving the implementation of Traveller-specific accommodation programmes through local authorities, and no activities address the accommodation needs of Roma. There are a number of policy gaps that the NTRIS activities do not currently address which need to be addressed in the next iteration of the NTRIS post-2022:

- activities to address Roma accommodation needs, including specific action to review the application of Circular 41/2012 which is preventing Roma access to social housing and homeless accommodation services and support,
- action to ensure mainstream housing policies, in particular, the Housing for All policy, include specific reference to preventing and addressing homelessness and overcrowding of Travellers and Roma,
- action to commit local authorities to ensuring Traveller inclusion in standard social housing.

In addition, at a minimum, the following accommodation targets should be defined in the new NTRIS, as set out in the 'EU Traveller and Roma strategic framework for Equality, Inclusion and Participation' for 2020-2030:

- cut the number of Travellers and Roma sleeping rough and using emergency accommodation in half by 2030,
- cut the overcrowding of Travellers in half by 2030,
- ensure 95% of Travellers have access to tap water in their dwellings by 2030, and
- reduce Traveller accommodation deprivation by one-third by 2030.

2.6. Social protection

A significant barrier for many Roma is related to the application of the Habitual Residence Condition (HRC). The European Free Movement Directive 2004/38/EC has been transposed into Irish law under the European Communities (Free Movement of Persons) Regulations 2015 SI 548/2015. Establishing a right to reside in the state is a precondition specified according to this legislation and involves applicants needing to meet the HRC. If the latter are not deemed to have satisfied the HRC, they are unable to access a range of non-contributory social protection benefits, including child benefit, a medical card, and job-seeker's allowance, nor access many forms of employment and training support. Applicants cannot be deemed to be habitually resident unless it can be established that they have a right to reside in the state.

⁴⁴ 2019 Annual Estimate of Accommodation of Travellers in all categories of Accommodation. Department of Housing, Planning and Local Government.

⁴⁵ Pavee Point Traveller and Roma Centre and the Department of Justice and Equality (2018). Op cit.

The NTRIS specifies five activities that are the responsibility of the Department of Social Protection, all of which are employment-related and thus addressed in Section 2.3.

The next iteration of the NTRIS post-2022 needs to include a commitment to reviewing the impact of the regulatory barriers that are preventing many Roma from accessing social protection and employment and training-related state support.

2.7. Public services

The NTRIS specifies 11 activities related to the operation of public services and government departments:

- nine activities under the theme of public services (six mainstreaming activities and three targeted activities),
- two mainstreaming activities under the theme of employment.

Four of these activities are the responsibility of a specific government department/agency and the remaining seven are to be addressed by "all departments".

The seven activities that target all government departments have the greatest potential to address issues at the systemic level. These activities are:

- Action 26. Anti-racism and cultural awareness training for staff will be developed under the new shared learning Civil Service curriculum and will be made available in 2017 (responsibility of the Department of Public Expenditure and Reform).
- Action 33: All departments will equality-proof measures to ensure they are accessible for Travellers and Roma.
- Action 143. All departments and relevant agencies will ensure relevant staff receive anti-racism and cultural awareness training.
- Action 145. All departments and agencies will ensure the ten common principles of Roma inclusion underpin their strategic and operational activities.
- Action 146: The Department of Justice and Equality will chair a cross-Departmental working group, with involvement from Traveller and Roma representatives, with a view to developing a methodology for the introduction of an ethnic identifier on all data sets to facilitate the monitoring of access, participation and outcomes to services for Travellers and Roma.
- Action 148. All departments and agencies will explore the development of a system for capturing data on the participation of Travellers and Roma across all government departments and state agencies in all thematic areas and activities within their remit.
- Action 149. All departments and agencies will explore the introduction of stratified sampling to gather statistically significant data on Travellers and Roma.

Regarding the above-defined activities that are cited as the responsibility of "all departments" (Actions 33, 143, 145, 148, and 149), the NTRIS progress reports indicate the following:

- Action 33: No department/agency provides for an update on this action in its NTRIS reporting framework.
- Action 143: Only two departments provide for an update on this action in their NTRIS reporting framework: the Department of Social Protection informs that this action is "on track" and provides details about the type of accredited and non-accredited training provided to staff; the Department of Education informs that

this action has been “completed” and notes that “public sector duty” training was provided to staff in February 2020. The latter training, however, is not sufficiently granular to address anti-racism and increase cultural awareness.

- Action 145: Only one department provides for an update on this action in its NTRIS reporting framework: the Department of Education informs that this action has been “completed” (despite it being an ongoing obligation), noting that its “policies and strategies, where applicable, are aligned with the common basic principles on Roma inclusion”. No detail is provided in this regard.
- Action 149: Only one department provides for an update on this action in its NTRIS reporting framework: the Department of Education informs (in each progress update) that the “Department of Education can provide data from annual school census on numbers of students who have voluntarily self-identified as Travellers”.

The NTRIS traffic-light progress reporting framework indicates that despite these four NTRIS activities being assigned to “all departments”, only two of fifteen NTRIS departments/agencies included any of these activities in their progress reports. Of the two that did provide updates, only one is satisfactorily detailed: the Department of Social Protection’s updates regarding Action 143.

This is an issue which needs to be addressed in the next iteration of the NTRIS post-2022, within which such general activities will need to be associated with reporting requirements for all departments. In addition, the progress reports to date also highlight the need to include some common targets regarding expected outputs and outcomes to ensure the consistency of initiatives across departments in this regard.

The Department of Children, Equality, Disability, Integration and Youth has commenced the development of a National Equality Data Strategy with the Central Statistics Office and it is important that the next iteration of NTRIS is aligned with this Strategy.

2.8. Children

The 2018 Roma Needs Assessment found significant issues in regard to child welfare and poverty: in 50% of households with children, respondents reported that they did not always have enough food. They reported children going to school hungry and a lack of basic supplies for new-born babies. In addition, service providers who were interviewed for the Assessment reported cases of malnutrition among young Roma children.⁴⁶

A further, significant barrier for many Roma is related to the implementation of European Directive 2004/38 on the freedom of movement and residence and the Habitual Residence Condition (HRC). People from the Roma community who are unable to satisfy the HRC provisions are ineligible for state-funded support and payments, including those linked to further education and training and job-seeking. Many Roma families in Ireland face extreme poverty due to the application of the HRC, and as a result, are unable in some instances to access even the most basic food and shelter for their families. According to the Roma Needs Assessment, almost half (49.2%) of Roma households with children were not successful in their application for social protection payments, which means they are not receiving child benefit and other essential forms of payment and support.⁴⁷

The possibility that some individuals, particularly children, may be denied services on the basis of not meeting the HRC conditions is of critical importance and must be addressed.

⁴⁶ Pavee Point Traveller and Roma Centre and the Department of Justice and Equality (2018). Op cit., p. 62.

⁴⁷ Ibid, p. 63.

It is imperative that the new iteration of NTRIS addresses this gap and ensures that the children of all Roma families have access to social protection payments to meet essential needs, such as child benefit, which is not contingent on the fulfilment of the Habitual Residence Condition.

Traveller organisations have voiced concern that this situation is likely resulting in social workers having to consider taking children into care in order to provide them with basic support, although in the absence of data it is not possible to ascertain whether Roma children are overrepresented in the care system.

The NTRIS contains nine activities with a focus on children under the theme of Children and Youth (eight mainstreaming activities and one targeted action). The NTRIS March 2022 progress identifies that of these nine activities two have been completed and the remainder are identified as “on track”.

None of the children-focused activities in the NTRIS addresses the barriers Roma face as a result of the Habitual Residence Condition (HRC) in terms of accessing basic social protection payments that would help address significant the poverty and material deprivation of their children.

2.9. Promoting (awareness of) Traveller and Roma arts, culture, and history

In 2019, a curriculum audit was undertaken by the National Council for Curriculum and Assessment (NCCA) to inform the proposed curriculum changes.⁴⁸ This audit identified a significant scarcity of examples of schools or early childhood education settings that were providing learning and teaching opportunities to develop children’s knowledge and understanding of Traveller culture and history.⁴⁹ The NCCA has established an advisory group to support the inclusion of Traveller culture and history in curricula.

The 2019 audit also observed that intercultural education guidelines that were introduced into primary and post-primary-level schools over a decade ago (in 2005/6)⁵⁰ “never became an intrinsic element of a broader strategy and no mentoring mechanisms were put in place for their full implementation”.⁵¹

Intercultural education must include a dual approach that promotes understanding of and respect for cultural difference and addresses racism and discrimination at the individual and systemic levels in the education system. While the current focus on promoting understanding of and respect for Traveller culture in schools is very welcome, there is also a need to attend to address racism and discrimination as an integral part of an intercultural educational approach. The Irish Traveller Movement, through their intercultural education ‘Yellow Flag Programme’,⁵² has voiced the concern that there is insufficient focus on addressing racism in the school setting.⁵³

⁴⁸ NCCA (2019). [Traveller Culture and History in the Curriculum: A Curriculum Audit](#).

⁴⁹ Ibid, p. 133.

⁵⁰ National Council for Curriculum and Assessment (2005). [Intercultural Education in the Primary School](#): Guidelines for Schools.

National Council for Curriculum and Assessment (2006). [Intercultural Education in the Post-Primary School](#): Guidelines for Schools.

⁵¹ NCCA (2019). [Traveller Culture and History in the Curriculum: A Curriculum Audit](#), p. 28.

⁵² The Yellow Flag is an eight-step intercultural education programme for primary and secondary schools.

⁵³ [Opening Statement to the Joint Oireachtas Committee on Education and Skills](#): Yellow Flag Programme Coordinator, Irish Traveller movement. 26 March 2019.

The NTRIS contains nine activities related to Traveller and Roma culture (one mainstreaming action and eight targeted activities). The NTRIS March 2022 progress report identifies that of these nine activities one has been completed and the remainder are identified as “on track”.

The NTRIS contains one key action (Action 4) with significant potential to generate broader societal understanding of and respect for Traveller culture through education provision. This action commits the Department of Education to utilise its 2005/6 intercultural education guidelines for schools to “support schools in collaboration with Traveller and Roma organisations to develop educational resources on Traveller and Roma culture and history for use in primary, post primary and adult education settings”. As part of this action, the Department of Education has committed to undertake a review of the 2005/6 intercultural guidelines. This review was due to commence in 2021 but will not commence until the fourth quarter of 2022.

The post-2022 NTRIS could usefully include specific activities to support the embedding of intercultural education within schools and early-years centres through:

- mentoring and guidance for teachers and early-years practitioners about anti-Traveller and Roma racism; and
- ensuring schools develop anti-racism policies that address individual and systemic racism in education as an integral component of intercultural education.

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

The NTRIS 2017-2021 identifies three policy areas where synergy between the NTRIS and these policies is to be ensured: the National Drugs Strategy; the National Strategy for Women and Girls (2017-2021); and the Second National Strategy on Domestic, Sexual and Gender-based Violence (2017-2021).

A composite evaluation of NTRIS 2017-2021, the 'Migrant Integration Strategy', and the 'National Strategy for Women and Girls' (2017-2021) is presently being undertaken by the Department of Children, Equality, Disability, Integration and Youth. A mid-way review of the NTRIS 2017-2021 presented to the NTRIS Steering Group involved an initial comparison of the NTRIS, the 'Migrant Integration Strategy', and the 'National Strategy for Women and Girls' (2017-2021) and concluded that synergy gaps existed regarding the following areas:

- The absence of key performance indicators (KPIs) in the NTRIS compared to the other two strategies which contain KPIs;
- The NTRIS encapsulates a broader range of areas than the other two strategies. This, it was noted, "could lead to a lack of clarity on who does what and also has the potential to burden the areas in question from a time and resource standpoint";
- The NTRIS, unlike to other two Strategies, does not always identify who is responsible for delivering on specific activities; and,
- The NTRIS, unlike the other two Strategies, does not include a strategy for data collection.⁵⁴

The NTRIS 2017-2021 does not identify synergies with other national policies in key domains such as employment, accommodation, education, and health. This is a gap, and concerns have been raised that policymakers within these key policy areas are consigning sole responsibility for Traveller and Roma policy issues to the NTRIS, without consideration of how a dual approach of targeting and mainstreaming is required that ensures that Travellers and Roma are named target groups within mainstream education, housing, employment, and health policies.

In addition to ensuring synergy with the aforementioned three national policies identified under the current NTRIS, the next iteration of the NTRIS post-2021 should seek to ensure alignment and mutually reinforcing outcomes with the following strategies and plans:

- the forthcoming 'National Action Plan Against Racism',
- the national employment strategy: 'Pathways to Work' (2021-2025),⁵⁵
- the forthcoming 'National Traveller Health Action Plan', and,

⁵⁴ March 2021. A Report by the Research and Data Analytics unit in the Department of Justice & Equality, to inform a mid-way review of the NTRIS 2017-2021. 2021, pp. 24-25.

⁵⁵ [Pathways to Work \(2021-2025\)](#). Government of Ireland. Prepared by the Department of Social Protection. For the first time, the national jobs strategy identifies Travellers and Roma as specific target groups. A number of targeted activities are contained in the strategy, including the development of a Traveller and Roma training, enterprise, and employment plan. It is important that the post-2022 NTRIS ensures alignment with this Strategy and includes targeted activities for Travellers and Roma.

- the outcome of the current reviews of the 'Migrant Integration Strategy' and the National Strategy for Women and Girls.

3.2. Responsibility for NTRIS coordination and monitoring

The NTRIS 2017-2021 is a cross-government strategy led by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY)⁵⁶ and chaired by the minister of that department, which is to be commended. The commitments, activities, and financial and staffing resources made available by the Department of Children, Equality, Disability, Integration and Youth, to the NTRIS need to be reinforced and reflected in other government departments.

The NTRIS Steering Group, which comprises officials from across the relevant government departments and agencies, "aims to foster inter-Departmental and cross-sectoral working".⁵⁷ Eleven Traveller organisations, including all of the national organisations, are represented in the NTRIS Steering Group. A mid-term review report that was presented to NTRIS Steering Group members identified a number of challenges, including the efficacy of the Steering Group as a driver of the implementation of the Strategy.

Issues noted include:

- members lacking an understanding of their role;
- the absence of an agreement about robust oversight;
- insufficient meeting time spent on strategic issues; and,
- meeting minutes not being circulated in a timely manner.⁵⁸

The DCEDIY is tasked with driving and overall monitoring of the NTRIS. Concerns have been raised, however, about the limited authority which a single government department has to drive policy outcomes that are the responsibility of another government department. This is further compounded by the lack of sustainable resourcing by all government departments for supporting implementation. Although there has been investment from the DCEDIY, there is an urgent need to replicate and mainstream this across other government departments and identify a budget for the next iteration of NTRIS. A mid-term review presented to the NTRIS Steering Group provides information from NTRIS stakeholders about factors that may have negatively affected statutory buy-in at the development stage of the 2017-2021 NTRIS.

The key issues noted in this regard were as follows:

- in some instances, activities were inserted into the NTRIS without prior consultation with the relevant department as to the feasibility of undertaking them;
- officials with responsibility for Traveller accommodation were not consulted as part of the NTRIS drafting; and,
- departments/agencies needed but were not given guidance on developing an implementation plan for their activities.⁵⁹

⁵⁶ Prior to 2020, the NTRIS was the responsibility of the Department of Justice and Equality. Following the general election of 2020, the equality brief was transferred into a newly reconfigured Department of Children, Equality, Disability, Integration, and Youth.

⁵⁷ Department of Justice and Equality, [National Traveller and Roma Inclusion Strategy, 2017 – 2021](#). Department of Justice and Equality, p. 19.

⁵⁸ March 2021. A Report by the Research and Data Analytics unit in the Department of Justice & Equality, to inform a mid-way review of the NTRIS 2017-2021. 2021. Page 27.

Table 1. provides information on the range of departments/agencies tasked with the delivery of the NTRIS across its ten thematic areas. As may be noted, there are twenty-two NTRIS activities where there is no named lead department/agency that is identified as having responsibility for monitoring and driving implementation. The majority of these twenty-two activities are cited as being of relevance to “all departments/agencies” or “relevant departments/agencies”. In the absence of a named driver, however, it is difficult to secure good outcomes or consistency of approach regarding these activities. The NTRIS progress reports indicate that for a number of these activities with no named lead there is no reporting in the monitoring framework.

Table 1.

<i>Thematic area</i>	<i>No. of actions</i>	<i>Depts./agencies responsible for actions</i>	<i>No. of activities where no dept/agency is named as lead</i>
Culture	9	Department of Justice and Equality; Department of Education; Department of Agriculture, food and the Marine.	2
Education	14	Department of Education; Department of Further and Higher Education; Department of Justice and Equality; SOLAS; “all relevant departments” (1 action).	1
Employment	13	Department of Social Protection; Department of Housing, Planning and Local Government; Department of Education; Local Enterprise Offices; SICAP Programme implementers.	4
Children & youth	25	Department of Children and Youth Affairs; Tusla Child and Family Agency; Department of Education; Department of Health; the Health Service Executive; SICAP Programme implementers; An Garda Siochana; Local Authorities; “all relevant departments” (1 action); “all public bodies” (1 action).	5
Health	35	Health Service Executive; Department of Health; National Office for Suicide Prevention; Department of Justice and Equality.	0
Gender equality	12	Department of Justice and Equality; Department of Children and Youth Affairs; Department of Education; Health Service Executive; Tusla Child and Family Agency; “all relevant departments” (2 activities).	4
Anti-discrimination & Equality	17	Department of Justice and Equality; An Garda Siochana; Department of Jobs, Enterprise, and Innovation; Department of Housing, Planning and Local Government.	2
Accommodation	6	Department of Housing, Planning and Local Government; the National Traveller Accommodation Consultative Committee.	0
Traveller and Roma communities	9	Department of Housing, Planning and Local Government; Department of Justice and Equality; An Garda Siochana.	0

⁵⁹ Ibid, pp. 33-34.

Public Services	9	Department of Housing, Planning and Local Government; the Irish Human Rights and Equality Commission; Department of Justice and Equality; "all/ relevant departments and agencies" (4 activities).	4
Total	149		22

A number of factors need to be addressed in the post-2022 strategy to secure more effective implementation and monitoring. These are outlined in the Conclusions and Recommendations Section.

3.3. Quality of the plan

The NTRIS 2017-2021 contains 149 activities covering ten thematic areas. The activities encompass areas of responsibility spanning fifteen government departments/ agencies, with a number of activities requiring collaboration between two or more departments/agencies.

The NTRIS is ambitious and has significant potential to improve the situation and experience of Travellers and Roma in Ireland. The Strategy, however, suffers from:

- a lack of specificity regarding some of the activities;
- underestimating the number of tasks associated with specific activities, thus delaying their implementation;⁶⁰
- a lack of named leads for some activities;
- an absence of targets, indicators,⁶¹ and timelines; and,
- the lack of activities under the accommodation theme that address Roma housing issues.

A number of factors need to be addressed to improve the quality of the post-2022 strategy and to advance the equality, inclusion, and participation of Traveller and Roma communities. These are outlined in the Conclusions and Recommendations Section.

3.4. Funding

In 2017, one million EUR was allocated for the implementation of the NTRIS (800,000 EUR for Traveller initiatives and 200,000 EUR for Roma initiatives). In 2017, the Steering Group was informed that no further funding would be available in 2018 and that the Strategy would be implemented from existing funding allocations from the relevant departments. While in 2018 Dormant Accounts funding⁶² became available to progress NTRIS activities, this funding was one-off. More recently, the DCEDIY indicated that under NTRIS a budget of 5.659 million EUR would be allocated for 2022 (an increase of 734,000 EUR over the 2021 allocation).⁶³ It is critical that other government departments follow suit by allocating adequate resources to support implementation.

Regarding the majority of NTRIS activities, government departments/agencies have to utilise existing departmental budgets. In this regard, the budgets of some departmental

⁶⁰ Ibid, p. 11.

⁶¹ Indicators have been identified in some instances; however, these were not developed in consultation with Traveller and Roma members of the Steering Group. Where indicators are identified, they are sporadic and not outcome-focused.

⁶² The Dormant Accounts Fund was established by legislation and enables unclaimed funds from accounts in credit institutions in Ireland to be used to support (1) the personal and social development of persons who are economically or socially disadvantaged; (2) the educational development of persons who are educationally disadvantaged.

⁶³ Parliamentary response from the [Minister of Children Equality Disability Integration and Youth](#) on Department supports made available to Travellers and Roma

units with specific lines for Traveller and Roma-focused initiatives were significantly reduced following the 2008 financial crisis. Between 2008-2013 the nature of these cuts were the following: 86% cut to Traveller-specific education support; 85% cut to the budget for Traveller accommodation; 40% (approximate) reduction in the Traveller health budget;⁶⁴ and 63% cut in funding for national Traveller organisations.⁶⁵ These budget cuts have not been reversed since the period of economic recovery so most departments/agencies are expected to implement NTRIS activities within this context of diminished budget lines.

The NTRIS post-2022 must set out the costs associated with activities and ensure the existence of a dedicated budget at the onset of the Strategy's commencement.

3.5. Monitoring and evaluation

The NTRIS 2017-2021 did not contain specific timescales for the delivery of activities: timescales are at the discretion of the relevant departments/agencies. The onset of the COVID-19 pandemic completely stalled or delayed the delivery of a number of activities, following which momentum in 2022 has been slow. The Strategy committed to producing an annual progress report, but none has been produced to date.

The NTRIS monitoring framework involves government departments and agencies reporting on progress regarding their departmental commitments in the form of short updates based on a 'traffic light' framework. The framework descriptors are: Black (action not yet scheduled to commence); Green (action broadly on track); Amber (action progressing but with minor delivery issues); Red (action delayed with significant delivery issues); and Blue (action fully completed). A recent consultation involving Traveller and Roma representatives on the NTRIS Steering Group identified that this framework has not proven to be effective for monitoring progress with NTRIS activities and that a different monitoring framework is required.⁶⁶ In addition, the mid-term review presented to NTRIS Steering Group members noted that clearer definitions of each status were required, rather than subjective measurements such as "broadly on track".⁶⁷

A key gap in the current NTRIS is the absence of targets with associated indicators against which progress can be measured. In the absence of such targets, reporting on the progress of activities is a more subjective exercise. It is also the case that the absence of national data disaggregated by ethnicity across key policy domains continues to represent a key barrier to setting NTRIS targets and measuring progress.

A number of factors need to be addressed in the post-2022 strategy to improve monitoring and evaluation. These are outlined in the Conclusions and Recommendations Section.

3.6. Assessment of the expected effectiveness and sustainability

The NTRIS 2017-2021 contains 149 specific activities ranging from very specific to very broad in scope. Section 2 of this report details the status of activities across each of the key policy areas and, as noted, the vast majority of activities have not been completed within the lifetime of the current strategy. A key reason for this is that the majority of activities involve ongoing initiatives. In such instances, it is unclear what specifically the

⁶⁴ The Traveller health budget was shrinking prior to the financial crisis in 2008. The area of Traveller health has not received any new development funding since 2008.

⁶⁵ Harvey, B. (2013). [Travelling with Austerity](#): Impact of cuts on Travellers, Traveller projects and services. Pavee Point Traveller and Roma Centre.

⁶⁶ Note of NTRIS Civil Society Representatives Meeting, 14 October 2021.

⁶⁷ Department of Justice and Equality (March 2021). Op cit., p. 10.

lead department/agency is expected to deliver within the lifetime of the current strategy. In the absence of such targets and associated timelines, those responsible for implementing activities can make subjective assessments regarding their progress.

A number of key targeted activities with the potential to address a range of health and education inequalities have not been delivered within the life of the NTRIS 2017-2021, specifically:

Health. Action 73: The Health Service Executive will develop and implement a detailed health action plan [...] to address the health needs of Travellers using a social determinants approach.⁶⁸

Education. No education activities which are covered under the development of a national Traveller education strategy that have been committed to have been delivered. Plan for a commitment reflects longstanding requests by Travellers and Traveller organisations for a national Traveller education strategy.

The mid-way review of the NTRIS, in consultation with NTRIS stakeholders, identified the need for consultation with the relevant departments at the design stage of the Strategy; and allocating time for the development of an implementation plan.⁶⁹

⁶⁸ In their Progress Update to the NTRIS Steering Group. 3 July 2019, the Health Service Executive committed to producing a draft of the plan by the fourth quarter of 2019. However, the final plan has not been published yet (it is currently with the Department of Health for their approval).

⁶⁹ Department of Justice and Equality (March 2021). Op cit.

4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

4.1. Reflecting diversity among Roma

The NTRIS (2017-2021) contains a number of activities that address diversity, as set out in Table 2.

Table 2.

<i>Group</i>	<i>No. of actions</i>	<i>Thematic areas</i>
Roma women	12	<ul style="list-style-type: none"> - addressing multiple disadvantages - support in key areas (education, employment, and economic development) - addressing violence against women
Roma children and youth	25	<ul style="list-style-type: none"> - consulting children and youth in the development of policy, research, and services. - preventative and early intervention support. - participation in culturally appropriate youth programmes. - special focus on Traveller and Roma children's rights.
Roma LGBTI	3	<ul style="list-style-type: none"> - culturally appropriate support for LGBTI Travellers and Roma.
Disabled Roma	10 (all related to mental health and wellbeing)	<ul style="list-style-type: none"> - reducing the rate of suicide and mental health problems within the Traveller and Roma communities and putting positive mental health initiatives in place.

4.2. Combining mainstream and targeted approaches

The ten thematic areas in the NTRIS (2017-2021) contain both mainstreaming and targeted activities as set out in Table 3.

Table 3.

<i>NTRIS thematic area</i>	<i>No. Actions</i>	<i>Mainstreaming actions</i>	<i>Targeted actions</i>
Cultural Identity	9	1	8
Education	14	9	5
Employment & the Traveller economy	13	7	6
Children and Youth	25	19	6
Health	35	17	18
Gender Equality	12	6	6
Anti-discrimination & Equality	17	6	11
Accommodation	6	2	4
Traveller and Roma communities	9	1	8
Public Services	9	6	3

As can be noted, the thematic areas of Health, and Children and Youth contain considerably more activities than the other thematic areas. As previously noted, there is a need to ensure that the post-2022 strategy contains fewer, but more strategic

activities with the potential to deliver outcomes for Travellers and Roma. In this regard, it is also important to ensure a balance of targeted and mainstreaming activities to address issues of inequality in key domains.

4.3. Usage of instruments introduced by the Council Recommendation

The 2018 evaluation of the previous EU 'Framework for National Roma Integration Strategies' identified that monitoring and reporting systems needed to be strengthened and that there was a lack of reliable data disaggregated by ethnicity in Member States. These findings resonate with the situation pertaining to the NTRIS 2017-2021 and must be remedied in the forthcoming strategy post-2022.

Regarding the new EU 'Roma Strategic Framework', the content and approach of the NTRIS substantively aligns with the horizontal measures and substantive policy areas. One gap, however, is the absence of targets and related indicators, which needs to be addressed in the NTRIS post-2022.

The 2020 Communication from the European Commission on the EU Strategy Framework for Roma Inclusion, Equality, and Participation identifies the need to ensure that improving outcomes for Roma is integral to the work of Member States in addressing the challenges that the EU faces today (including the coronavirus pandemic, climate change, and the green and digital transitions).⁷⁰ The post-2022 NTRIS in Ireland will need to include activities that reflect these challenges.

⁷⁰ [Annex to the Communication from the Commission to the European Parliament and Council: A Union of Equality](#): EU Roma strategic framework for equality, inclusion and participation. COM (2020) 620 Final. Annex 1. European Commission. Brussels 7.10.2020.

CONCLUSIONS AND RECOMMENDATIONS

Given the current context in Ireland whereby the current NTRIS 2017-2021 remains valid while a review is undertaken to inform the next iteration of the NTRIS, we recommend that Ireland moves as rapidly as possible to publish the review and commence the development of its new iteration of NTRIS while ensuring alignment that is as close as possible with the EU 'Roma Framework' and related 'Council Recommendations'.

Regarding the development, implementation, and monitoring of the post-2022 NTRIS, the following is recommended regarding the strategy's development, ambition, implementation, and monitoring:

Strategy development:

- Building on the existing Strategy, all key stakeholders should be consulted and involved in the development stage to ensure buy-in.
- Strategy activities should be clearly defined and each action should be associated with a named department/agency that is responsible for its delivery. Where activities are relevant to a number of departments/agencies, a lead driver department/agency should be identified.
- At the development stage, targets with associated measurable indicators and proposed timelines should be established across areas of action. Regarding activities that are ongoing in nature, annual targets should be identified to cover the lifetime of the strategy.
- Each department/agency should identify what baselines and data are available and will be required to monitor progress using strategy indicators and targets. Gaps in this regard need to be identified and addressed/mitigated at the design stage.

Strategy ambition:

- The post-2022 NTRIS should contain a smaller number of annualised activities that are strategic in nature but have the potential to achieve tangible outcomes for Roma and Travellers in key domains. This could serve to focus attention on the key barriers to equality where government action should more strategically be focused. Some key activities in this regard are:
 - o A commitment to review the impact of regulatory barriers related to the application of the Habitual Residence Condition that prevents many Roma from accessing social protection, social housing, and employment and training-related state support.
 - o Making a commitment to develop a national Traveller education strategy.
 - o Initiatives for addressing the Roma housing situation.
- Activities that are ongoing in nature should be associated with definitions of their level of ambition (by way of targets and indicators) to be achieved within the lifetime of the strategy, with progress measured at different milestones/key stages.
- The post-2022 NTRIS should seek alignment and mutually reinforcing outcomes with the following: the national employment strategy 'Pathways to Work' (2021-2025); the forthcoming 'National Action Plan Against Racism'; the forthcoming 'National Traveller Health Action Plan'; the forthcoming 'National Strategy for Women and Girls'; the forthcoming third 'National Strategy on Domestic, Sexual

and Gender-based Violence'; and the forthcoming 'National Equality Data Strategy'.

Strategy implementation:

The strategy should be costed and associated with a defined and ring-fenced budget to support implementation from all government departments/agencies, ensuring full and optimal use of EU funding for the areas of social cohesion (ESF+, ERDF).

- Departments/agencies should be provided with a common framework for developing an implementation plan for the activities they have responsibility for. This should include the identification of potential barriers along the implementation chain and of potential solutions at the earliest stage in the life of the strategy.
- Cross-departmental subgroups could be set up whereby experience and knowledge can be shared.

Strategy monitoring:

- Each lead department/agency should develop or improve its data systems to ensure the availability of data disaggregated by age, gender, ethnicity, and age to measure strategy progress. This should ensure alignment with the forthcoming National Equality Data Strategy.
- A new monitoring NTRIS framework should be developed which requires monitoring reports from action leads according to targets, milestones and indicators developed at the strategy design stage, to be reviewed and updated throughout the life of the strategy as relevant.
- An annual NTRIS progress report should be produced by the department responsible for driving the NTRIS and made publicly available.

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