



National Traveller and Roma Inclusion Strategy Steering Group, Roma Representatives: Response to the Draft National Traveller and Roma Inclusion Strategy, 2024-2028

This response is submitted on behalf of Roma representatives on the National Traveller and Roma Inclusion Steering Group: Pavee Point Traveller and Roma Centre; Cairde and Musicantia. We acknowledge the significant work undertaken to develop the draft successor Strategy and associated Action Plan. We welcome engagement with the key Government Departments and State Agencies, in developing actions, and the commitment to departments working together and in partnership with Traveller organisations and groups working with Roma to achieve full effective implementation. This requires resourcing from all government departments, including a commitment to new core funding where required (e.g.) Action 29, Action 45, Action 55, etc. to ensure effective implementation and in line with the Commission's recommendations.

The Strategy is also marked with some improvements from NTRIS I, including a stronger proposed implementation framework, including a high level Steering Group chaired by the Minister for DCEDIY, with a Secretariat provided by the Department, is to be welcomed. A clear and transparent process, including a Terms of Reference as well as criteria for membership will be required as regards to the establishment of a new Steering Group. Overall, there are some positive developments contained in the Action Plan, including:

- A renewed and strengthened focus regarding Roma, with Roma specific actions across most thematic areas. However, in some areas, Travellers and Roma have been included in actions together- without clear indicators for either (e.g.) Actions 12, 30, 32, etc.
- Named department/agency across all actions, in some areas this could be strengthened and joint actions across departments. Further clarification on the responsibility either designated to Traveller and Roma NGOs or an existing function of a government body, Actions 3, 5, 9, 12, 25, 40, 53, 59, 62, 76 and Accountability and - Action 73. Some actions identify Traveller and Roma organisations without commitment to investment (e.g.) Actions 35, 49, 64, 75, 76
- Inclusion of KPIs and targets by some Departments (e.g.) employment. This requires further strengthening across all actions in addition to targets
- Commitment to monitoring and evaluation, including the publication of annual reports.

Areas requiring further consideration:

- The Strategy commits to policy alignment (p.23), in particular the NAPAR, NSWG, MIS, National Equality Data Strategy. However, there is no clear alignment of existing Strategies outside of DCEDIY (e.g.) Sláintecare, NTHAP, NDS, forthcoming TRES, etc. Rather, reference is made in the Strategy document.
- Actions as per Programme for Government commitments- the Traveller and Roma Training, Employment, and Enterprise Plan and the Traveller and Roma Mental Health Action Plan
- Ethnic data needed across all themes. Most actions require ethnic data. A proposed review of systems of data collection is to take place (p.70). This exercise has already been undertaken a number of times, including most recently by the [CSO](#) in 2020. It is also not clear

the added value of additional review. Instead, implementation of ethnic equality monitoring (inclusive of a universal ethnic identifier) is urgently required. This was a commitment in NTRIS I.

- Overall structure of the Strategy document is difficult to follow and requires amending. NTRIS members could send in track changes to DCEDIY.
- Some terminology used throughout both documents require amending (e.g) 'settled;' 'cultural norms, cultural preference'
- Significant issues are addressed by relevant Departments in the Action Plan before finalisations or an identified process for how they will be addressed is identified in advance of finalisation.
- Action 73 the proposed new NTRF requires further clarification as currently suggests that Traveller organisations and groups working with Roma will convene an annual Forum and will be held accountable on the progress/implementation of NTRIS. Suggest amending text to: A new National Traveller and Roma Forum (NTRF) to be established by the NTRIS Steering Committee. The NTRF will convene an annual forum which will comprise of Department Officials and national and local Traveller and Roma organisations. The NTRF will have a mandate to question NTRIS II Steering Committee representatives regarding the annual reports and progress in NTRIS
- Terminology and framing requires attention and revision (e.g.) settled, cultural norms, cultural preference, etc.
- Action 68: Commitment to develop/establish new Roma groups, however, commitment needed to sustain existing projects through core funding through all departments (not just DCEDIY). Suggest to also include activity to continue to encourage the national network which currently bring all involved initiatives and organisations together and identify need for new initiatives, including **dedicated Roma** organisations
- Commitment to training for all government departments welcomed, however, this needs to be broader than cultural awareness; need for anti-racism and discrimination (including Travellers and Roma) as part of ongoing commitments to NAPAR.
- Number of actions seek to increase participation and engagement of Roma (e.g.) Action 18, while welcome, it is unclear how this can be operationalised without commitment to interpreters
- Ensure that the literature on Roma draws from diverse sources by incorporating relevant and recent studies, such as Cairde's National Roma Infoline reports in Section 1, "Roma in Ireland," and Section 5, "Strategic Themes, Outcomes, and Objectives".
- **Action 79:** proposed programme of research not identified in the consultation, significant concerns re: language 'Traveller cultural norms and preferences' and research agenda (e.g.) early marriage, - how has this emerged as a priority through the Department.

Significant gaps:

- No actions on environmental justice and/or climate which disproportionately impact on Travellers and Roma.
- No action to address the supports that Roma need in accessing PPS numbers.
- Actions regarding accommodation are limited, the Strategic objective does not include Roma and overall, actions only commit to providing interpretation services. While welcoming interpretation services, there is a need to address fundamental issues as related to accommodation and homelessness for Roma and Traveller as per consultations. This includes:
 - Undertaking an equality and human rights review of the Habitual Residence Condition and its implementation, and, based on this, take action, and establish a standard, to address and eliminate the negative impacts its current implementation has on Roma accommodation.

- Establish and resource a dedicated Roma accommodation unit in the Department of Housing, Local Government, and Heritage.
- Resourcing for groups working with Roma to develop targeted initiatives in response to homelessness
- Actions on children/young people primarily responsibility of TUSLA and no reference to the Department of An Taoiseach (Child Poverty and Well-Being Programme Office)
- No clear action to address child poverty, including establishing a baseline or to tackle the issue systemically through universal application of Child Benefit
- Commitment to Traveller history and culture welcomed and suggest that an action is also developed for Roma to commit to Roma history and culture welcomed, to include the Roma Holocaust/ Porajmos.
- Education/Employment: Given the major language barriers faced by Roma, the training of Roma interpreters is a necessity.