

Commentary on the Combined Fifth to Ninth Periodic Reports Submitted by Ireland

For Review at the UN CERD Committee’s 100th Session

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# Background Introduction

The Irish Traveller Movement, “A Movement for Change” was founded in 1990 as a national membership organisation representing Travellers. Our membership consists of 40 local and national Traveller groups. One of our core principles is to challenge the racism that Travellers experience in Ireland. The Irish Traveller Movement welcomes the opportunity to submit replies to the Committee on the Elimination of Racial Discrimination (CERD) on Ireland’s Fifth to Ninth Periodic Report.

As all replies by the Irish State in its 2018 Report are noted as ongoing, this submission deals with specific, but not all, issues of concern related to Travellers. The Irish Traveller Movement has included, as appendices, background information on several specific areas of concern. This will provide CERD with further information with which to pursue a thorough examination of Ireland’s 2018 State Report.

# Context of Irish Travellers

Travellers are an indigenous ethnic minority who, historical sources confirm, have been part of Irish society for centuries. Travellers’ long shared history, cultural values, language, customs and traditions make them a self-defined group and one which is recognisable and distinct. Their culture and way of life, of which nomadism is an essential factor, distinguishes them from the settled population.

## The population of Travellers in Ireland

In the last Census (2016), 30,987 Travellers were enumerated, accounting for less than one per cent of the total population of Ireland. We believe this figure to be an underestimation. Data from the Department of the Environment and Planning counts 11,116 Traveller families. This would equate to approximately 44,000 individual Travellers. Travellers are one of the most marginalised communities in. Traveller exclusion has had a detrimental effect on Traveller ability to play a full and equal role in in all aspect of Irish Life.

# Policy and legislation

## Re: State Reply (iii) - State Bodies

### The Irish Human Rights and Equality Commission

The Irish Human Rights and Equality Commission Act of 2014 introduced a positive legal duty on all public bodies to have regard to the elimination of discrimination and the promotion and protection of human rights and equality in the course of their work.

The Irish Human Rights and Equality Commission (IHREC) invoked an audit (June – September 2019), directing every local authority in the State to undertake an equality review on their provision of Traveller accommodation. The audit will focus on failures to draw down ring-fenced capital budgets and whether such failings may be due to discriminatory practices or policies under the Housing Act (1998) and the Equal Status Act (2004). Findings of the audit are expected in the coming months.

Since the introduction of the Public Sector Duty in 2014, this is the first audit of public services as they relate to Travellers. The inclusion of an ethnic identifier is critical in order to measure the effectiveness of the Public Sector Duty and to determine the practice, policy and procedure of public services towards Travellers.

# Traveller Ethnicity

## Re: State Reply 28 & 29

As referenced in the 2018 State report concerning Paragraph No.12, there has been improved dialogue between the State and Traveller representative organisations since the declaration by the State of Travellers as a minority ethnic group on the 1st March 2017. In view of this, there is now a greater opportunity to combat racism and discrimination, enhance integration and inclusion and elevate the Travelling Community’s status both internally and within the State. In respect of Traveller’s unique position on the island, this can only assist in the promoting relations among the wider Irish society.

Consultation between the Irish State and the community has however not happened on specific measures.

At present, Travellers are not represented in State-sponsored national and mainstream intercultural initiatives and there is no visibility of Traveller history, culture and heritage in the prescribed education curriculum.

In seeking to address some of these matters, national Traveller organisations have independently advanced relationships and advocated for progress in political and cultural settings. As Travellers are Ireland’s only indigenous group, Traveller history and culture should be taught within the national educational curriculum.

As Travellers are Ireland’s only indigenous group, Traveller history and culture should be taught within the national educational curriculum, which will be subject to a political consensus.

Traveller’s unique culture and heritage has a valuable place in the national perspective and it is both invisible and underutilised. Making national cultural institutions, who are the keepers of Traveller assets, more inclusive will support cultural and philosophical ownership. Traveller organisations have developed positive relationships with national museums and cultural institutions but no funding has been made available nor has there been any indication by the State towards strategies in this regard.

In response to the State’s obligations under the 2003 UNESCO Convention to establish a National Inventory for Intangible Cultural Heritage, the inclusion of Gammon / Cant (Traveller languages) and the traditional Traveller craft of tinsmithing was an incredibly important first step. There are now opportunities for further dialogue with the State concerning the safeguarding of Traveller culture and heritage both in the national consciousness and for the Traveller community to enjoy and participate fully in cultural rights[[1]](#footnote-1). This will also create space to restore Travellers’ unique language in a Traveller-specific and culturally appropriate setting.

A multifaceted plan is needed, with targeted goals throughout strands of Irish life, at local community level, in education settings, in both private and public employment, in civil society, in public services, in the national narrative of culture, heritage and history and in the articulation of public interest matters.

 **Recommendations:**

1. State engagement with the Traveller community on a safeguarding strategy of Traveller culture and heritage, enhancing their participation in cultural, social and economic life with clear and ring-fenced resourcing and a time-lined action plan to include consideration of:
	* 1. Government support for the inclusion of Traveller history and culture within the pre-primary, primary and post-primary educational curriculum
		2. Establish a National Network of Traveller cultural centres
		3. A commitment to support a unified central repository of all National Traveller Collections and to ensure collections are accessible to and overseen by Travellers
		4. A commitment to meeting the cultural education and language needs of Traveller children
		5. Make mandatory the inclusion of Travellers within national and mainstream cultural and heritage initiatives and social and cultural infrastructure.
2. Resource a national public education campaign to support the promotion of Traveller visibility, pride and identity.

# National Traveller and Roma Inclusion Strategy

## Re: State Reply 31

The Irish Traveller Movement welcomed the National Traveller and Roma Inclusion Strategy 2017-2024 (NTRIS) and the establishment of the National Traveller and Roma steering committee with Ministerial oversight of 149 thematic actions on accommodation, public service, culture & identity, health, anti-racism, children & youth, employment, gender equality and other actions seeking to address some of the many issues impacting on Travellers and Roma within Ireland.

The Irish Traveller Movement is deeply concerned that there are no other Traveller state strategies outside of National Traveller Roma Inclusion Strategy. There are no national State-led strategies in the areas of Traveller education and attainment, Traveller health, mental health and anti-racism. There is an urgency that is required of the different government departments to address all underlying issues. The Traveller Community in Ireland is at a crisis point and is being disproportionally affected across all indicators. (See replies 49-53)

While we welcomed the Department of Justice and Equality Traveller policy unit coordinating NTRIS, we would like to note the loss of the Traveller Social Inclusion Unit. Recently the Department undertook a process of transformation, culminating in the disbanding (August 2019) of the Traveller Social Inclusion Unit. Full responsibility for coordinating & overseeing the implementation of National Traveller Roma Inclusion Strategy was divested to the following new structures:

1. A single Policy, Legislation and Governance function in each pillar
2. A single Operations and Service Delivery function in each of the Criminal Justice and Civil Justice pillars
3. An Immigration Service Delivery function in the Civil Justice pillar which will include border management and immigration services
4. One combined Transparency function for the Department

Without a Traveller Social Inclusion Unit, we are concerned how this will adversely affect the implementation of NTRIS, given that previously a fully dedicated team worked in collaboration with all key stakeholders to coordinate national Traveller policy within Ireland.

To date, the 149 NTRIS actions are progressing at a slower rate than originally anticipated and some actions have halted, for example the ethnic identifier. New emerging issues, such as the reduced timetables within Schools has disproportionately impacted on Travellers (see replies 49-53), fall outside of NTRIS attention.

Other significant gaps within NTRIS are where key implementing actions are embedded in the Strategy but without overarching strategic plans developed by other departments with responsibility for those actions, for example in education, health, mental health, racism, employment and young people. While we welcome the progress made to date within NTRIS, it is not sufficient enough to address the chronic issues impacting on all aspects of Travellers lives in Ireland.

**NTRIS Action 28-30 Traveller Accommodation (See further replies 41, 42 & 43)**

Traveller Accommodation Expert Review:This report sets out an integrated set of recommendations intended to improve the effectiveness of the arrangements for providing accommodation for Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. These recommendations address four key themes:

* Delivery reflecting need,
* Planning,
* Capacity and resources and,
* Governance.

In light of this recent report and the related role NTRIS has to the area, the strategic actions under Accommodation needs to be reviewed with immediate effect in context to how these recommendations are delivered.

**Recommendations:**

1. For the National Traveller Roma Inclusion Strategy to be fully costed by each of the related departments under each action and be included as an appendix to NTRIS Plan.
2. Establish a dedicated unit, fully resourced and supported to coordinate the National Traveller Roma Integration Strategy
3. Development of comprehensive, goal-driven Strategic Plans with time-lined objectives across all the systematic themes : Employment , Education, Health, Mental Health, Young people, Accommodation and Anti-Racism
4. Implement more robust reporting mechanisms on the each of the actions within NTRIS
5. NTRIS Action 28-30 Traveller Accommodation will now need to be reviewed in light of Expert Report to the Traveller Accommodation Act 1998

Re: State Reply 34.

To increase funding to be invested by the state to promote knowledge of and pride in Traveller culture and heritage. The Department of Justice and Equality Support Traveller Pride Week each year with aim of

* Celebrate and promote Traveller and/or Roma culture in Ireland
* Promoting a positive image of Traveller and/or Roma Culture to the wider settled community

**Recommendations:**

1. The Irish Traveller Movement welcomes this initiative, however giving the very high level of prejudice and racism experienced by Irish Travellers in all aspects of Irish life in Ireland, we recommend there is a need to resource a National Traveller campaign to promote Traveller culture and identity, building on the existing work of Traveller Pride.

Re: State replies: 36: Data Collection

*A third sub-committee has been set up to look at the implementation of an Ethnic Identifier for equality data across all state services.*

The Sub-Committee established under NTRIS on data collection was disbanded in March 2018 and redirected to the Migrant Integration Data Gaps Working Group on behalf of the Office for the Promotion of Migrant Integration (OPMI), to undertake mapping and analysis of relevant data held by public bodies. Progress not been reported.

1. Where a small number of Government Departments via specific strategies comply with replies to enquiries (March 2018) by the Department of Justice, the same enquiry found some Departments have no plans to introduce an ethnic identifier.
2. Travellers are currently under-represented on national mainstream strategies by specific identification and so priority in needs-driven services, for example, housing, health, mental health and suicide is absent, often resulting in an underestimation of need and leading to exacerbation of problems.[[2]](#footnote-2) [[3]](#footnote-3)
3. Currently, the introduction of GDPR has also stalled progress with ambiguity on the matter of releasing and publication of information.
4. Disjointed low-level data collection is ineffective, driven by individual agents and offers no comparable analytics and benchmarking and where funding for collection is subject to political whim.

**Recommendation:**

* 1. Establish a National Ethnic Equality Monitoring framework to lead and monitor the progress of a national strategy to include all relevant agencies in the area of data collection, Government Departments and Traveller stakeholders.

# Traveller and Roma initiatives at the local level

## Traveller Accommodation

## Re: State Reply 41, 42 and 43

Despite the Traveller Accommodation Act 1998, Traveller families in need of accommodation in the State (yr. 2000) has more than doubled, there are five times the number of families sharing, accounting for 4,460 people in overcrowded halting sites and substandard housing. 2,000 people are in unauthorised sites, and over 9,000 Travellers in local authority-supported, private, rented accommodation.

Travellers have experienced an elevation of homelessness (517 Travellers) separate to those living in substandard and overcrowded shared accommodation and equating to 11 times the general population.[[4]](#footnote-4)

A Government review of Traveller accommodation provision (2000-2016) found consistent local authority underachievement of targets (only 68% of units provided in that time) and €55 million of allocated budgets unspent, most of which occurred before the economic recession. In 2016 it was confirmed that “*the budget (for Traveller accommodation) was reduced because of a change in policy in order to accommodate the Traveller community through the standard social housing mode”*. This resulted in families pushed into the private rented sector (162 families in 2002 to 2,387 in 2017) and where they are 22 times more likely to be discriminated by landlords (IHREC report 2018). This rendered increased numbers of homeless Travellers and fuelled the accommodation crisis.

In July 2019, the Government-commissioned Review of the Traveller Accommodation Act was published. It found that, despite legislative provisions *“(they had) failed to meet the full scale of accommodation need among the community, evidenced by the extremely high rate of Traveller homelessness, the increase in numbers of Traveller households sharing accommodation and living in overcrowded conditions, and the uneven record of delivery of Traveller-specific accommodation among local authorities and ‘also by approved housing bodies”*.

Failures in the Housing Assessment process examined by the Expert Group to the Review confirmed that “Traveller households in receipt of Housing Assistance Payments and RAS allowances were not being captured in the Social Housing Assessments data”. This resulted in Travellers not being counted under the national assessment who, once in receipt of this scheme, were excluded for Traveller specific assessment. The system to accurately determine the need and plan accordingly was grossly flawed.

**Recommendations:**

1. There is now an urgent need for the Irish State to develop a clear, precise action plan in conjunction with the all National Traveller representatives on National Traveller Accommodation Consultative Committee to implement the recommendations from Independent Expert Group in addressing Traveller accommodation in Ireland.
2. We call for establishment of the Independent Governing Authority to oversee the changes and ring-fenced Traveller Accommodation budget.

**Findings of the Review included:**

The Irish Traveller Movement welcomes the findings of the Review and call for implementation of each recommendation.

1. A review of the Trespass legislation; the specific legislation for the removal of temporary dwellings as introduced in Section 10 of the Housing (Miscellaneous Provisions) Act, 1992 and Section 69 of the Roads Act, 1993;
2. More integration between and misalignment of timing and cycles, of the Traveller Accommodation Programmes and the Housing Strategy/Development Plans;
3. A more consistent approaches in different Development Plan policies and objectives for Traveller accommodation;
4. Traveller Accommodation be included in all relevant objectives for Traveller accommodation in Local Area Plans or Strategic Development Zones Planning Schemes;
5. More coordination of local policies and objectives between local authorities and delivery of Traveller-specific accommodation through the Part 8 process;
6. Local Elected Members to utilise of land for the purposes of developing Traveller accommodation;
7. Funding available for Traveller-specific social housing and mainstream social housing occupied by Travellers;
8. The drawdown and use of the funding available for Traveller-specific social housing by local authorities;
9. The role of voluntary sector approved housing bodies in Traveller accommodation provision;
10. The quality of the design, management and maintenance of Traveller-specific social housing; Reporting of spending on the provision, refurbishment, management and maintenance of Traveller-specific social housing.

**Recommendations:**

1. Implement the recommendations of the Expert Group taking account of the priority needs of Travellers in shared, overcrowded and emergency accommodation and implement immediate underpinning Governance with a focus on the establishment of the Independent Governing Authority and an adequate ring-fenced budget.

# Traveller Health

The Irish Traveller Movement notes the specific remit of Pavee Point Traveller Roma Centre, as the National lead in relation to Traveller health and refers to their report for further replies.  Notwithstanding, the following points are relevant in relation to Traveller Mental health.

**Re: State Reply 44, 47 & 48**

Travellers’ experience of poor mental health and suicide, in particular, is over-represented when compared with findings in the non-Traveller population in Ireland. 60% of Travellers reported their mental health in the preceding 30 days as not good, compared with 20% nationally. Suicide was found to be six times higher than the settled population, accounting for approximately 11% of all Traveller deaths.[[5]](#footnote-5)

Since the publication of the All Ireland Traveller Health Study 2010, there has been an ongoing rise of suicide in the community and broader poor health outcomes.  According to the National Traveller Survey 2017, a nationally representative sample of 90% of all Travellers said that mental health problems are common among the community and 7 out of 10 said their mental health had worsened over the last 5-10 years and with 4 out of 10 concerned for their mental health.[[6]](#footnote-6)

Suicide: There has been a steep increase in suicide in the last five years and among Traveller women. 82% of Travellers reported having been affected by suicide, 4 in 10 in their wider family, 49% among local Travellers or neighbours and 38% among friends or colleagues, creating a catastrophic effect with families impacted with multi-level effect.[[7]](#footnote-7)

The lack of data, either by way of a national study or of an assessment of need, worsens the problem. The Central Statistics Office and National Suicide Research Foundation have a role here when recording and monitoring, but Travellers are not included. Travellers are included in only 1 of the 69 actions of C*onnecting for Life,* 2015 to 2020 Ireland’s National Strategy to Reduce Suicide, and feature as one “high-risk group” but little progress has been made.  There is no specific inclusion of Travellers as a high-risk group in the HSE’s National Service Plan 2019.

NTRIS has 13 actions towards Traveller and Roma mental health. Concerning mental health, latest progress reports show one specific action, the recruitment of 9 mental health service coordinators to support access to and delivery of mental health services for Travellers in each Community Health area has been achieved. Two years on, progress on the other actions have not been initiated or are at early-stage development. Neither has a ring-fenced budget to deliver on the actions been supplied.

The policies and strategies to address Traveller mental health are disconnected. Given the context and scale of the problem, they lack a priority focus and are without ring-fenced resourcing. This is additionally complex as actions are dispersed across departments; there is no advisory group overseeing implementation and progress and supporting data collection is inadequate.

The Minister for Health has committed to renewing the Department of Health-led National Traveller Health Advisory Committee which has been dormant for some years.

**Recommendations:**

1. In consultation with Traveller stakeholders, implement a national Traveller Mental Health Strategy with ring-fenced resources, centrally located with a specific Traveller advisory group to support its development and monitor progress. Reinstate the Traveller Health Advisory Committee and appoint a Department lead on Traveller health and mental health to monitor and progress actions across departments and initiatives.
2. Implement the universal ethnic identifier across all health and mental health services and collection points and within strategy monitors and research strata.

# Traveller Education

## Re: State Reply 49 – 53

### Context

### National Traveller Education Statistics

The gap between Traveller participation and retention in education has worsened and although there are over 8,000 Travellers currently enrolled in education, the Census of 2016 showed:

* Only 1% of Travellers have ever progressed to third-level education (167 Travellers) across the State and 55% overall had school left by the age of 15.
* Six out of ten male Travellers (57.2%) had only primary-level education; four times higher than the general population (13.6%).
* Just 13% of Traveller girls completed second-level education compared to 69% of the settled community.
* Travellers were over 50 times more likely to leave school without a Leaving Certificate that is [[8]](#footnote-8) only 8% of working-age Travellers compared to 73% of non-Travellers had reached Leaving Certificate[[9]](#footnote-9).

In the Budget 2011, Traveller-specific education supports were cut by 86.6%, disproportionate compared to cutbacks across mainstream educational settings. The Visiting Teacher for Travellers Service (VTTS) was reduced by 100% (a loss of 42 posts), Resource Teachers for Travellers (RTT) cut by 100% resulting in the withdrawal for some Travellers of essential resources to improve educational attainment and transition levels. 33 Senior Traveller Training Centres were closed. In that year only half of all Traveller children lived in Delivering Equality of Opportunity in Schools (DEIS) catchment areas.[[10]](#footnote-10)

Anecdotally the rates of early school leaving among the Traveller population has increased, having a detrimental effect on the retention of Traveller children in education. To replace some of the cuts made in 2011, the State gave supports to schools in the form of capitation grants, where an individual Traveller pupil might be in need of additional or special supports, of €70 per pupil for Primary and €201 per pupil in Post-Primary. However, support for other “in need” learners ranges from approximately €450-850 per pupil. In 2018/2019 there were 2,916 Traveller pupils in receipt of support.

Racism and discrimination towards Travellers in broader society is reflected within the education system and continues to present a significant challenge for Travellers. In 2017, 4 out of 10 Travellers said they or their children had been bullied in school because of their identity as a Traveller[[11]](#footnote-11). The ESRI found that one of the many reasons for children leaving school early is likely to be the negative experiences of Traveller children in school[[12]](#footnote-12). Traveller children (along with immigrant children and those with a disability) are significantly more likely to report being bullied at school[[13]](#footnote-13).

The Intercultural Education Strategy 2010-2015[[14]](#footnote-14); and more recently the Department of Education and Skills Action Plan on Bullying 2013[[15]](#footnote-15) recognised that some children, particularly children of non-Irish nationals and Traveller children are more vulnerable to racist bullying because of their identity and recommended that preventative strategies needed to be put in place by schools to address this. Regrettably, the National Traveller Education Policy, the *’Traveller Education Strategy’* remains inactive 13 years later.

The National Action Plan for Education 2016-2019 included a goal to increase the number of Travellers in higher education, proposing a target of 80 full and part-time undergraduate new entrants, linked to the National Traveller & Roma Inclusion Strategy[[16]](#footnote-16). No updated data is available on the uptake of a bursary scheme extended to third-level institutions in 2016, however in year 1 (2017/18), 10 of the available 200 were taken up by Traveller students.

Despite this welcome intervention, anecdotal evidence points to some Travellers being unable to afford necessities such as travel and accommodation, even with access to the 1916 Bursary. A clearer and committed strategy is needed by Government to ensure Travellers are enabled to progress from primary to post primary as a priority.

### Inclusion of Traveller culture and history

Traveller Culture and History is not visible within the Pre, Primary and Post-Primary education curriculum and there are no mandatory guidelines for schools on the matter. Travellers, as Ireland’s only indigenous minority, their way of life and historical context to Ireland’s shared history, is not taught or referenced across the whole school setting. The opportunity to learn about Traveller culture in a positive learning environment and therefore combat racism, prejudice and discrimination is neglected. A parliamentary Bill is currently at final stage of the Seanad which seeks to amend the Education Act, to make provision for inclusion of Traveller history and culture within the mainstream curriculum. This Bill has full support from the Traveller Community.

Review of Traveller Education Strategy

In 2019, the Department of Education and Skills conducted a Review of the Report and Recommendations for a Traveller Education Strategy which included consultation with Traveller representative organisations. The State focus has relied on a model to progress via DEIS schools, however, only 50% of Travellers attend DEIS schools and so half of all Travellers pupils cannot access supports such as Home School Community Liaisons and the School Excellence Fund. The Home School Community Liaisons in particular supports parents to engage with schools.

There is no data available to record where Travellers are at risk of early school leaving, the locations and monitoring of schools where this is occurring. This measure would ensure more effective targeting strategies in those areas and redress outstanding or arising issues. Without a visiting teaching service, or similar alternative, the ground work required, is disjointed and not visible.

### Reduced timetables

The Irish Traveller Movement has seen a rising trend in the practice of reduced timetables, which is a timetable consisting of something less than that which is provided to the majority of the students in that setting. Concerns have been raised regarding schools imposing the practice in non-exceptional circumstances, without parental consent and where some Traveller parents with educational disadvantage, have been encouraged into accepting a reduced timetable where schools put low expectations on Traveller students based on their identity and not their ability. It has also been used inappropriately as a method of managing behaviour for pupils already vulnerable to exclusion and with an increase showing in primary schools.

Currently there is no required monitoring of the practice by the Department of Education and Skills or TUSLA and National Traveller organisations have raised the matter calling for an investigation of its use. This has led to a Parliamentary Committee on Education examination on the matter, which is ongoing.

**Recommendations**

1. The State should renew the Traveller Education Strategy and reinstate the Traveller Education Advisory Group, as a matter of urgency, with a robust overseeing structure, targeted goals and adequate resourcing.
2. That NTRIS implement education actions as a matter of priority.
3. The Minister for Education and Skills should accelerate an inspection of reduced timetables and issue guidelines to schools with a view to implementing governing legislation.
4. The State must monitor and collate data nationally as a matter of priority where Travellers are at risk of early school leaving, noting locations and specific schools
5. Restore funding to support Traveller retention within education to the level prior to 2011
6. Intercultural awareness training should form a mandatory component of teacher’s continual professional development, to break down negative stereotypes and anti-Traveller racism in the school environment.
7. That the State and the Department of Education and Skills support the call for the inclusion of Traveller History and Culture within the curriculum by way of legislative amendment to the Education Act 1998.
8. The Yellow Flag Programme is adopted as a mainstream programme in Primary and Second-level education.
9. The enhanced capitation for Travellers at Primary School level should be increased to allow for supported transition between Primary and Post-Primary.

# Political Participation of Travellers

## Re: State Reply 56

Travellers encounter a number of obstacles from participating fully in political democracy. In terms of voting, the Electoral Acts requires a permanent place of address to be registered to vote, which is an obstacle for nomadic Travellers. In response, Travellers and Travellers organisations have taken a pragmatic approach working with local authorities to ensure all Travellers have the opportunity to register in one permanent place, whether transient or not.

Working with the Community, The Irish Traveller Movement and other national Traveller organisations have encouraged greater political awareness and support on lobbying on matters of Traveller equality. There is now increased visibility of Travellers among Oireachtas members and interdepartmental relationships with responsibility in policy areas. However, Travellers do not have a representative voice in either houses of the Oireachtas (Irish Parliament).

Local and European Elections (May 2019) brought forward 5 Traveller candidates, the most significant number to date, contesting in local areas without success. There is much hope that future years will see more candidates, however competing in an environment of anti-Traveller sentiment is challenging and limits opportunity for achievement, where 90% of Travellers nationally said they had experienced discrimination in 2017.[[17]](#footnote-17)

There is a need for Travellers to be represented in national and local political structures and within the mainstream political system. Benefits are twofold; it would support opportunities for integration, inclusion and Traveller-led articulation and promote Traveller visibility to the non-Traveller population.

The system to date has not created the apparatus for a space for minority voices. In that context but not exclusive to it, there is an immediate opportunity within the Seanad, a proposal which has also been supported by some political groups to allow for Traveller representation. Representation in political decision-making has been recognised by CERD who recommended in 2005 and 2011 that Ireland adopts “affirmative action programmes that seek to improve the representation of Travellers in political institutions.”

Nationally, given the population size and Ireland’s system of proportional representation, it disproportionately affects the likelihood for Travellers to be elected. The system which determines election to the Seanad, the upper house of Oireachtas, also disadvantages Travellers and should be examined with a view to addressing this. In recent years, local representation has regressed following the abolishment of town councils, where some Travellers were elected.

**Recommendations:**

* + - 1. The State makes the necessary legislative provision to allow for the representation and the inclusion of Travellers in the Seanad by right through the creation of a Traveller electoral college.
			2. Per article 18.3 of Bunreacht na hÉireann Bunreacht na hEireann, that the State ensure representation of a Traveller to the Seanad in the interim by taking into account recommendations for nomination by the Community and Traveller organisations
			3. That a Rapporteur for Travellers would be appointed to the Houses of the Oireachtas.
			4. That a panel of Traveller experts is appointed on a rotating and time-lined basis to support State partners and regulating bodies, where matters of potential relevance arise.
			5. The State recognises and resources the role Traveller organisations play in raising political awareness, through voter education and participation initiatives.

There is an immediate opportunity within the Seanad, a proposal has been put forward which has also been supported by some political groups to allow for Traveller representation

# Traveller Employment

## Re: State Reply 54 & 55

State response

The Special Initiative for Travellers (SIT) an employment and recruitment service to assist Travellers secure and maintain a job in the open labour market.

Response

The Irish Traveller Movement welcomed the SIT. However, the ‘the implementation of the SIT underwent a significant change in 2011, resulting in a broad number of the actions being integrated into the core work of the contracting agents with a reduction in the level of expenditure’.[[18]](#footnote-18)

Unemployment in the Traveller community stands at 84.3%,[[19]](#footnote-19) an increase from 74.9% in 2006. Austerity has been shown to have had a disproportionate impact where positive discrimination and employment initiatives have been significantly curtailed.[[20]](#footnote-20)

Discrimination, both direct (i.e. refusal to hire or provide services) and indirect (i.e. poor education, health and accommodation status of Travellers), is a factor also. Nationally, only 17% of the general public said they would employ a Traveller[[21]](#footnote-21) and The Irish Human Rights and Equality Commission (IHREC) found “Irish Travellers report very high rates of discrimination in seeking work, where they are ten times more likely than White Irish to experience discrimination. (The number of Travellers among survey respondents was too low to examine workplace discrimination).”[[22]](#footnote-22)

IHREC also noted the severe educational disadvantage which Travellers experience. In 2017, 66% of Travellers surveyed had participated in at least one, but on average 2.4, training schemes. However, only 30% of Travellers had progressed to employment as a result.

Opportunities for self-employment are limited leaving many Travellers long-term unemployed and living on social welfare.

Travellers are invisible in national employment activation strategies, despite their unique employment status as a group within the State. No specific measures under the National Action Plan for Social Inclusion 2007-2016 were identified to tackle the Traveller high unemployment rates and there have been no Traveller-specific targets within the Youth Guarantee or the Pathways to Work strategies up to 2020.

In Government responses, SICAP programmes reported that 457 individuals had accessed Goal 3 employment support, however only 22 people progressed into full or part-time employment from these with 29 people progressing on to self-employment. Between 2015 and 2017 only 2% of the participants of the SICAP programme self-identified as Irish Travellers, this could be attributed to low compliance with data collection and poor collection methods, and or low targeting by service implementers of Travellers into the limited strategies which are available to them[[23]](#footnote-23). Only 11% of Travellers involved employment supports through SICAP have found employment since. Overall, the State has not established a national Traveller employment strategy to look at innovative and ring fenced programmes needed to reduce Traveller unemployment and future proof Traveller’s social and economic protection.

**Recommendations**

1. Implement a National Traveller Employment Strategy.
2. Create a national action plan to mainstream Traveller employment across all facets of the public service with targets.
3. Implement robust monitoring including within INTREO, SICAP, LES and LEO's to determine Traveller engagement and progression, and measure and address gaps where they occur.
4. Improve reporting within NTRIS of employment actions and under Social Protection objectives.
5. Full restoration of the budget to resource and support the SIT employment initiative and reconvene Department of Justice and Equality and Department of Social Protection-led subcommittee under NTRIS, with an attached strategy.

# Hate-Crime and Hate Speech

## Re: State Reply 65-70

Travellers are over 22 times as likely to say they experience discrimination in Ireland in private services (shops, pubs, restaurants, banks and housing) than White Irish in 2017[[24]](#footnote-24).’ Over the course of their lifetime, 90% of Travellers had experienced discrimination, with 77% experiencing discrimination in the past year[[25]](#footnote-25).

Online hate speech towards Travellers is pervasive and “people are targeted as undeserving, uncivilised, thugs and criminals”[[26]](#footnote-26). Travellers are 38 times more likely to report discrimination than White Irish, even after controlling for education, employment status and housing tenure. Hate Track also states, *‘News articles about Muslims, Roma, and Travellers appear to elicit dehumanising racism, irrespective of the article’s context. The way mainstream media frame and present news is likely to have an impact on the type of comments that are likely to appear, with sensationalist headlines attracting a large volume of hateful comments’*.[[27]](#footnote-27)

The level of widespread discrimination against Travellers in all parts of Irish society indicates a need for a multi-faceted response and the renewal of a National Strategy Against Racism.

Since the last State report, hate crime legislation in Ireland has not been advanced and reporting of hate crime is made problematic by a lack of direction to the policing service, An Garda Síochána and in the justice system, regarding recording and prosecution. While courts can treat racist, including anti-Traveller and Roma motivations, as an aggravating factor, there is no obligation on them to do so. Where the hate element has not been adequately recorded, investigated, or prosecuted, it will not be addressed by the court at sentencing.

Since 2002, police reporting has included ‘discriminatory motives’ but without an ethnic identifier. In 2015 this was changed where every electronically police report logged must address whether or not the crime involved a discriminatory motive, including anti-Traveller and Roma motivations. In 2016, 308 crimes were logged by the police as having a discriminatory motive: 25 were recorded as having an anti-Traveller motivation, and less than three as having an anti-Roma motivation[[28]](#footnote-28).

In 2017, 31 hate-motivated incidents against Irish Travellers were reported to iReport, ENAR Ireland’s Racist Incident Reporting System.[[29]](#footnote-29)  An Garda Síochána also publishes data on hate crime incidents recorded by police in its annual reports; these are not broken down into the specific hate motivation. According to its Annual Report 2017, the police recorded 323 incidents of hate crime in 2017 (up from 290 in 2016)[[30]](#footnote-30).

Under-reporting and under-recording is likely to be significantly under-represent the problem in Ireland. Hate crimes against Travellers is on increase with recent attacks using petrol to try a burn Travellers out of their home. Local elected representatives in Waterford objected to the Traveller Accommodation Programme 2019-2014. The public commentary on boards.ie this year highlights the level of anti-Travellers sentiment. *“They used to say Wexford was but I'd say Waterford has taken over that mantle.” “Why don't social services take their children?” “Cut their social welfare off.” “They’re planning to expand the hell hole, more filth and caravans.” “They should pay taxes on their caravans and horses.”* This is just some and not all the comments. Boards.ie had to temporarily close down the commentary box. We have screengrabs some of the hate speech directed towards the Traveller community.

[https://www.boards.ie/vbulletin//showthread.php?t=2057994611](https://www.boards.ie/vbulletin/showthread.php?t=2057994611)

**Recommendations**

1. Introduce Hate Crime legislation, where Travellers are named for specific protection
2. Review the Prohibition of Incitement to Hatred Act 1989
3. An urgent need to have a national Anti-Racism Action plan and monitoring committee.
4. Resource the work of the European Network Against Racism in the collection, monitoring and reporting of racism with a specific focus on Irish Travellers

# Policing

## Re: State Reply 75-92

### Context: relationships between Travellers and An Garda Síochána

70% of Travellers have felt discriminated against by the Gardaí, 48% in the past year[[31]](#footnote-31).

In 2013, The Irish Traveller Movement consulted its national membership on relationships between Travellers and An Garda Síochána. This amplified the need for ongoing Equality and Traveller Cultural Awareness Training within An Garda Síochána as a means of building trust and relationships locally.

Issues ongoing include:

* A lack of confidence in protection of Travellers as victims of crime (e.g. slow response time to Traveller calls of incidents on halting sites).
* Negative views of Travellers by the Gardaí who see Travellers as criminals and never victims and where Travellers cite practices of:
1. Frequent stop and search/question of Travellers (especially van drivers and young Traveller men generally)
2. Frequent Garda car patrols on halting sites/group housing schemes up to 3 times a day
3. Installation of CCTV cameras beside existing or planned Traveller accommodation, without notification or public consultation
4. The frequent use of armed response units

An independent human rights audit[[32]](#footnote-32) of An Garda Síochána found that Officers and Members expressed negative views about some communities, in particular Travellers and the Nigerian community. It found “*allegations about levels of criminality among the Traveller and the Nigerian communities were made at every level of those taking part in this survey, with very little hard evidence provided to substantiate them*”. It concluded: “*on the basis of this audit it seems clear that there is institutional racism within An Garda Síochána in its dealing with certain groups in the community and in the absence of organisational structures which would identify and deal with what is a very fundamental abuse of human rights*”.[[33]](#footnote-33) Academic research on the poor relationships between Travellers and An Garda Síochána also highlights the scale of the problem.[[34]](#footnote-34)

Work by Traveller Inter-agency Committees, Joint Policing Committees and links between Local Traveller Organisations and the Ethnic Minority Liaison Officers, is welcomed but not pervasive.

Given the concerns outlined by Travellers supported by the independent human rights audit which raised serious concerns about institutional racism, ongoing independent oversight of the An Garda Síochána is required.

**Recommendations**

1. Establish an Independent Policing Board
2. Legislation should be developed and enacted to create an Independent Policing Board with nominations from both political parties and civil society. Given the historical lack of relationship between the force and the community, at least one Traveller should be part of the policing board, from a representative organisation that would allow Travellers’ voices to be brought from a local level to a national oversight committee
3. Implement an annual independent human rights audit with recommendations made to the Policing Board in order to identify and combat all forms of institutional racism.
4. In terms of oversight, legislation introduced to ensure that An Garda Síochána were no longer exempt from the Equal Status Act and future equality legislation
5. Enact recommendation number 22 from the Future of Policing Report[[35]](#footnote-35) on the building of Community Partnerships.

# Broadcast Authority of Ireland

## Re: Updated Information on the Implementation of Articles 1-7 of the Convention Other Bodies –Article 6

### Other Bodies

*There are several other fora in which complaints involving racism may be pursued in appropriate cases. These include the Press Council of Ireland, the Press Ombudsman and the Broadcasting Authority of Ireland in the context of the media, and the Garda Síochána Ombudsman Commission concerning complaints concerning the conduct of members of An Garda Síochána.*

In the context of media:  There continues to be stereotyping in reporting of Travellers despite codes of the Press Council (which is not a statutory regulator) and of the Broadcasting Authority of Ireland, where the latter has gone some way to redressing unfair reporting.

Of the ten broadcasting codes and rules, Travellers are implicitly protected under equality grounds. However, the guarantee of their inclusion and explicit protection require them to be named explicitly within the Codes as a group for protection. Some stations operating under the BAI continue to host shows where Travellers regularly feature as a group to be singled out, stereotyped and inciting anti-Traveller sentiment. There is no monitoring by the BAI of broadcasting practice as a standard by which to measure compliance with the license agreement.

**Recommendations**

1. The establishment of an expert group to or place on the Press Council and the Compliance Committee to the BAI on matters of equality and minority interest should be considered and monitoring of Broadcast compliance, though the BAI’s structures, should be applied as a matter of course.

Irish Traveller Movement

[http://www.itmtrav.ie](http://www.itmtrav.ie/)

4/5 Eustace Street
Dublin 2
Ireland
Tel: +353 1 679 65 77
Fax: +353 1 679 65 78

# LIST OF APPENDICES

March 2019 Yellow Flag Submission to Join Oireachas Committee on Education & Skills

<https://itmtrav.ie/wp-content/uploads/2019/03/YF-Submission-to-the-Joint-Committee-on-Education-and-Skills-regarding-the-progression-by-Member-of-the-Traveller-Community-to-second.pdf>

March 2019 ITM Submission to Joint Oireachtas Committee on Education & Skills

<https://itmtrav.ie/wp-content/uploads/2019/03/ITM-Submission-to-Joint-Oireachtas-Committee-on-Education-Skills.pdf>

January 2019 ITM Submission to the expert group in relation to review of the Traveller Act 1998 - October 2018

<https://itmtrav.ie/wp-content/uploads/2019/02/ITM-Review-of-housing-act-1998.pdf>

ITM Submission to the development of Traveller Accommodation Programme 2019-2024

<https://itmtrav.ie/wp-content/uploads/2018/11/Irish-Traveller-Movement-Submission-to-the-Development-of-the-Traveller-Accommodation-Programme-2019-2024.pdf>

Sept 2018 TravellerHomesmatter Campaign

<https://itmtrav.ie/strategic-priorities/accommodation/traveller-homes-matter/traveller-homes-matter-files/>

2014 ITM Submission in relation to Garda Oversight April 2014

<https://itmtrav.ie/wp-content/uploads/2016/11/ITM-Submision-in-relation-to-Garda-Oversight-April-2014.pdf>

2019 –July Expert Review Group Report

<https://www.housing.gov.ie/sites/default/files/publications/files/2019_july_expert_review_group_traveller_accommodation-final_reportrt_00.pdf>

**Join Oireachtas Committee**

Engagement with representatives of the Traveller Mental Health Network, the Irish Traveller Movement, Kerry Travellers Group, Ms Minnie Connors, and Pavee Point on issues relating to Travellers' mental health

<https://www.oireachtas.ie/en/oireachtas-tv/video-archive/committees/2818/?fbclid=IwAR1IoFy8xwvEhOOOdrm2vv8U_C3ZBeLoxSlLWjUhIJzzKr4tyXSQDU3Rjug>

<https://www.oireachtas.ie/en/oireachtas-tv/video-archive/committees/?fbclid=IwAR2DYx9goL92Fjra7M4BXv8lpq0x2iqwWvEVHvdfokNu5TNP5M3JlqZPIn0>

Seanad Chamber, Public consultation on Travellers Towards a more equitable Ireland post-recognition

<https://www.oireachtas.ie/en/oireachtas-tv/video-archive/committees/2738/?fbclid=IwAR1cc2zgjSsbqDbcv0XtGdcO-BXHM2rZJA_Kje3ZVk62aF9S2NrdSgbcEs8>

Senator Kelleher's closing remarks in support of the Traveller Culture and History in Education Bill 2018. On the 16th October 2019, The Traveller Culture and History in Education Bill 2018 passed the Seanad with Government amendments Traveller Culture and History in Education Bill to the Dáil, Minister [@McHughJoeTD](https://twitter.com/McHughJoeTD) on the record to say he will steer it through. Opportunities to refortify in Dáil

<https://www.youtube.com/watch?v=wS-fshsMSaM&feature=youtu.be>

**Media Coverage**

19th October 2019 - It’s because I’m a Traveller

<https://www.independent.ie/regionals/sligochampion/it-is-because-we-are-travellers-38592993.html?fbclid=IwAR163vCt6GM79zvJnjP6v6MxvWaR8-w7lN_rOIfxFLP-FYlUHT1crdl3oa4>

23rd October 2019 - Travellers' culture is 'ignored, rejected and marginalised'

<https://www.rte.ie/brainstorm/2019/1023/1085102-is-part-of-irelands-cultural-heritage-in-danger-of-extinction/?fbclid=IwAR3q5aTurEco_TDAq7JSX3lw7XZY-GxSAq96ZAZPOqjUgLfwJImfEzcAQok>

21st October 2019 - Standoff Limerick halting site <https://www.limerickleader.ie/video/news/487804/watch-standoff-at-limerick-halting-site-as-council-moves-to-recover-illegally-occupied-bay.html>

17th October 2019 - Traveller advocate calls on public representatives to condemn attacks

<https://www.oceanfm.ie/2019/10/17/traveller-advocate-calls-on-public-representatives-to-condemn-attacks/?fbclid=IwAR17Bkb644ZgU7uF0J0BdQ-5rwiG1pydvcbjPWP897TYaBiWmJ3aZAcs1nc>

5th August 2019 – Letters to the Editor (Councils and Traveller accommodation)

<https://www.irishtimes.com/opinion/letters/councils-and-traveller-accommodation-1.3975715?fbclid=IwAR0Byzjt3z0J9Qum56-HfBbF_Is2pA3pahcrL97WTzmGiZJBrYEpdYh43xk>

13th June 2019 - Reduced school timetables 'impacting children's rights’ <https://www.rte.ie/amp/1055162/>

1. [International Covenant on Economic, Social and Cultural Rights](https://en.wikipedia.org/wiki/International_Covenant_on_Economic%2C_Social_and_Cultural_Rights) (ICESCR), recognizes and protects a number of core economic, social and cultural rights, and the right of ethnic, religious or linguistic [minorities](https://en.wikipedia.org/wiki/Minority_group) to engage in their culture, practice their religion and use their language in Article 27. [↑](#footnote-ref-1)
2. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017 [↑](#footnote-ref-2)
3. The All Ireland Traveller Health Study - <https://www.paveepoint.ie/wp-content/uploads/2013/10/AITHS-Summary-of-Findings.pdf> [↑](#footnote-ref-3)
4. Census 2011 [↑](#footnote-ref-4)
5. Census 2011 [↑](#footnote-ref-5)
6. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017 [↑](#footnote-ref-6)
7. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017 [↑](#footnote-ref-7)
8. A Social Report on Travellers in Ireland. (2017) ESRI. Dorothy Watson, Oona Kenny and Frances McGinnity [↑](#footnote-ref-8)
9. Ibid [↑](#footnote-ref-9)
10. Number of Pupils who are Members of the Traveller Community, February 2017, Department of Education and Skills. Available at: https://www.education.ie/en/Publications/Statistics/Statistical-Reports/Membership-of-the-Traveller-Community-2000-2001-2015-2016.pdf [↑](#footnote-ref-10)
11. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017 [↑](#footnote-ref-11)
12. A Social Report on Travellers in Ireland. (2017) ESRI. Dorothy Watson, Oona Kenny and Frances McGinnity [↑](#footnote-ref-12)
13. State of the Nation’s Children, Ireland 2016. The Department of Children and Youth Affairs [↑](#footnote-ref-13)
14. Intercultural Education Strategy, 2010- 2015 (2010) Department of Education and Skills and the Office of the Minister for Integration [↑](#footnote-ref-14)
15. Action Plan On Bullying Report of the Anti-Bullying Working Group to the Minister for Education and Skills January 2013 [↑](#footnote-ref-15)
16. CUMASÚ - Empowering through learning Action Plan for Education 2019. Prepared by the Department of Education and Skills [↑](#footnote-ref-16)
17. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017 [↑](#footnote-ref-17)
18. http://www.paveepoint.ie/wp-content/uploads/2013/10/Travelling-with-Austerity\_Pavee-Point-2013.pdf [↑](#footnote-ref-18)
19. Census 2011 [↑](#footnote-ref-19)
20. Pluralism and Diversity in Ireland (2011). Micheál Mac Gréil [↑](#footnote-ref-20)
21. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017  [↑](#footnote-ref-21)
22. Who experiences discrimination in Ireland? (2017) Frances McGinnity, Raffaele Grotti, Oona Kenny and Helen Russell on behalf of IHREC. Available at: <https://www.ihrec.ie/app/uploads/2017/11/Who-experiences-discrimination-in-Ireland-Report.pdf> [↑](#footnote-ref-22)
23. Social Inclusion and Community Activation Programme (SICAP) End of programme report 2015-2017 September 2018. Available at: <https://www.pobal.ie/app/uploads/2018/09/SICAP-End-of-programme-report-2015-2017.pdf> [↑](#footnote-ref-23)
24. Who experiences discrimination in Ireland? (2017) Frances McGinnity, Raffaele Grotti, Oona Kenny and Helen Russell on behalf of IHREC. Available at: <https://www.ihrec.ie/app/uploads/2017/11/Who-experiences-discrimination-in-Ireland-Report.pdf> [↑](#footnote-ref-24)
25. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017  [↑](#footnote-ref-25)
26. Hate Track: Tracking and Monitoring Racist Speech Online (2019) Eugenia Siapera, Elena Moreo, Jiang Zhou [↑](#footnote-ref-26)
27. Ibid [↑](#footnote-ref-27)
28. Data provided by the Central Statistics Office. [↑](#footnote-ref-28)
29. Michael, L, ENAR Ireland - iReport Quarterly Report January - June 2017, & Michael, L, ENAR Ireland - iReport Quarterly Report July - December 2017, Available at: <http://enarireland.org/ireport-quartertly/> [↑](#footnote-ref-29)
30. An Garda Síochána Annual Report 2017. Available at www.garda.ie. p96 [↑](#footnote-ref-30)
31. National Traveller Survey – Attitudes of and to the Traveller Community. Behaviour and Attitudes, Market Research. Oct 2017  [↑](#footnote-ref-31)
32. An Garda Síochána Human Rights Audit, Ionann Management Consultants, June 2004

<http://www.minelres.lv/reports/ireland/PDF_Ireland%29Comhlamh_GardaHRreport.pdf> [↑](#footnote-ref-32)
33. Ibid [↑](#footnote-ref-33)
34. Alright in their own place’: Policing and the spatial regulation of Irish Travellers” Aogán Mulcahy

Criminology and Criminal Justice July 2012 vol. 12 no. 3 307-327 [↑](#footnote-ref-34)
35. *The Future of Policing in Ireland*, Commission on the Future of Policing in Ireland, September 2018. [↑](#footnote-ref-35)