

**ADVISORY COMMITTEE ON THE  
FRAMEWORK CONVENTION FOR THE  
PROTECTION OF NATIONAL MINORITIES**

COUNCIL OF EUROPE



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**Comments of the Government of Ireland on the Fifth Opinion of the Advisory Committee on the implementation of the Framework Convention for the Protection of National Minorities by Ireland**

received on 19 February 2025

*The comments have been submitted under the sole responsibility of Ireland and made public by the Council of Europe Secretariat in accordance with Rule 29 of Resolution CM/Res(2019)49 on the revised monitoring arrangements under Articles 24 to 26 of the Framework Convention for the Protection of National Minorities.*

**Comments of the Government of Ireland on the Fifth Opinion of the Advisory Committee  
on the implementation of the Framework Convention for the Protection of National  
Minorities by Ireland**

**19 February 2025**

## 1. GENERAL

The Government of Ireland notes and welcomes the Advisory Committee's view that Irish society continues to demonstrate overall respect for diversity and sensitivity to intersectionality, and its recognition of the Irish authorities' efforts to adopt national strategies and actions plans to support those that have been excluded over many years.

The Irish Government recognises that Travellers and Roma remain amongst the most marginalised and discriminated groups in Ireland. Both communities continue to face disadvantage, discrimination, and inequalities across a range of indicators, including employment, health, accommodation, and education. The Irish Government is conscious of the vulnerability of the Traveller and Roma communities in Ireland and the need for targeted responses to address the issues and barriers they face.

The National Traveller and Roma Inclusion Strategy 2024-2028 (NTRIS II), launched in July 2024 to replace the previous inclusion strategy, was developed to respond to the systemic challenges facing both communities. NTRIS II represents a whole of Government approach to ensuring and facilitating the full inclusion and active participation of the Traveller and Roma communities in Ireland's social, economic, cultural, and political life. Its purpose is to realise a safe, fair, and inclusive Ireland where Travellers and Roma are supported to lead inclusive, healthy, and fulfilling lives.

NTRIS II is informed by a stronger outcomes-focused approach than its predecessor. It was developed in close consultation with Traveller and Roma organisations, and it incorporates a robust implementation structure with achievable actions and clearly defined key performance indicators. NTRIS II will be implemented across two 2-year Actions Plans to maintain a focus on delivery and outcomes. A new Steering Committee has been established that includes Traveller and Roma representatives and will have a more strategic role than its predecessor in addressing issues that are critical to strategy delivery.

To ensure high level political oversight, and as part of NTRIS II's monitoring and reporting structure, the Steering Committee will report regularly to the Government Cabinet Committee on Social Affairs and Public Services, supported by the Senior Officials Group, as well as to the Oireachtas [Parliament] Committee on Children, Equality, Disability, Integration, and Youth. This will assist the process of ensuring the necessary resources are secured by Departments in the annual Estimates process to enable NTRIS II actions to be implemented.

There is provision also for the close involvement of the Traveller and Roma communities as the new Strategy is implemented. There will be transparent quarterly public reporting on progress in delivering actions across all relevant Departments, State Agencies, and Traveller and Roma organisations; this will be supported by the publication of an annual report on progress.

The Irish Government also welcomes the Advisory Committee's recognition of the significant efforts made in the field of education. The Traveller and Roma Education Strategy 2024-2030, published in July 2024, builds upon ongoing work across the continuum of education and aims to ensure equity of access and opportunity, and to improve educational outcomes, for all Travellers and Roma within the education system.

A range of further initiatives have been undertaken since the Advisory Committee finalised its Opinion. These are addressed in the comment under the relevant Articles and summarised below.

In terms of employment, the Civil Service Traveller and Roma Internship Programme seeks to extend the pilot scheme introduced in 2023 by increasing the number of both participants and employing Departments, and by creating a pathway to permanent employment. The next iteration of the Programme is being

progressed on a cross-Department basis and will be launched later in 2025 with the support of Traveller and Roma organisations.

As regards the recognition of Roma history, on 18 September 2024, the Government supported Pavee Point Traveller and Roma Centre in hosting a national event in the Mansion House, official residence of the Lord Mayor of Dublin, entitled, ‘*Never Again – Recognition, Remembrance and Reflection on the Roma Genocide*’. This event commemorated the 80th Anniversary of the Roma and Sinti Genocide during the Nazi era.

Finally, a number of recent reports have been published that draw from the disaggregated data made available after Census 2022 and other sources, and will further underpin the evidence base for future policy relating to the Traveller and Roma communities:

- *Understanding Attitudes to Travellers and Roma* (Economic and Social Research Institute, December 2024); and
- Statistical Spotlight on Roma in Ireland (Department of Children, Equality, Disability, Integration, and Youth, January 2025).

## 2. ARTICLE BY ARTICLE FINDINGS

### *Article 3 of the Framework Convention: Personal Scope of application of the Framework Convention*

**Paragraph 35. The Advisory Committee urges the authorities to formally clarify without further delay the extent to which persons belonging to the Traveller and Roma communities are protected under the Framework Convention with a view to providing them with effective access to the rights enshrined in the Framework Convention in accordance with their needs and interests.**

As set out in the Fifth State Report, Ireland has not made a declaration on the application of the Framework Convention to any particular national minority. It is important to note in this regard that Ireland does not recognise Irish Travellers as a national minority, understanding this to be a concept not applicable to their self-identification as an ethnic group of the Irish nation with a distinct heritage, culture and identity. However, Ireland has acknowledged the Traveller community as a distinct ethnicity, and this was formally recognised in the Dáil [the lower house of Ireland’s parliament] on 1 March 2017.

In this regard, the Irish authorities continue to maintain an inclusive and open approach towards the scope of application of the Framework Convention, consistent with the views and recommendations of the Advisory Committee as set out in its previous (Fourth) Opinion on Ireland, adopted on 10 October 2018:

*‘10. ... The Advisory Committee welcomes the overall pragmatic approach applied by the Irish authorities, which facilitates access to rights contained in the Framework Convention for persons belonging to the Irish Travellers and Roma communities. It welcomes in particular the State recognition of the Traveller minority ethnic group, as a first and important step ....*

*11. The Advisory Committee also welcomes the inclusive approach of the authorities with regard to persons belonging to the Roma communities. This approach seems prompted by the inclusive attitude of Traveller organisations towards recently arrived Roma, which was gradually extended to public policy, as illustrated by the adoption of the National Traveller and Roma Inclusion Strategy.*

*Recommendation*

*12. The Advisory Committee invites the authorities to pursue their efforts to acknowledge the place of Irish Travellers in Irish society and to review, in this context, and in consultation with Traveller representatives, any legislative or policy changes required to guarantee persons belonging to Traveller communities the effective enjoyment of the rights guaranteed by the Framework Convention.'*

The Irish authorities wish to emphasise that they are continuing to implement, and to report upon, measures to improve the effective enjoyment of the rights guaranteed by the Framework Convention for persons belonging to the Traveller and Roma communities by means of:

- (i) a process of legislative review, for example, the ongoing review of the Equality legislation, including as regards its effectiveness in addressing complaints of discrimination experienced by Travellers and Roma; and
- (ii) a process of ongoing policy development, in consultation with Traveller and Roma representatives, including, most recently: the Traveller and Roma Education Strategy 2024-2030, which aims to ensure equity of access and opportunity, and to improve educational outcomes, for all Travellers and Roma within the education system; and the National Traveller and Roma Inclusion Strategy II 2024 – 2028, which represents a new and more profound commitment by the Irish Government to improving the effective inclusion of Travellers and Roma in the economic, social, political and cultural life of Ireland.

*Article 3 of the Framework Convention: Data collection and population Census*

**Paragraph 40. The Advisory Committee invites the authorities to make a joint analysis with the representatives of Traveller and Roma communities, combined with other disaggregated data collection, of the results of the census, which should serve as the basis for policy making regarding access to minority rights and with a view to the conduct of the next census.**

The National Action Plan Against Racism (NAPAR) is a whole-of-Government approach to taking meaningful actions to address racism and its impacts in Ireland. Covering the period 2023-2027, one of the NAPAR's priority actions is to collect ethnically disaggregated data across all policy domains. It determines that both quantitative and qualitative data are essential to informing our understanding of, and responses to, racism in all its forms. Designing and implementing effective programmes to eliminate systemic racism relies on the availability of such data.

In addition, the National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS II) and related Action Plan provides for a specific action (Action 79) to establish a Traveller and Roma Research Advisory Committee. This Committee will include representatives from national Traveller and Roma organisations as well as from relevant Government Departments and State Agencies. It is intended that the Committee will consider the availability of existing research relevant to the issues addressed under NTRIS II, advise on new research initiatives on which it is consulted, and propose the commissioning of new research as it considers appropriate.

It is intended that the actions under strategies such as NAPAR and NTRIS II will be supported by recent publications, such as *Understanding Attitudes to Travellers and Roma* (ESRI, 2024) and the Statistical

Spotlight on Roma in Ireland (DCEDIY, 2025), which will provide further avenues towards the study of ethnically disaggregated data. The availability of the census data provided the basis for both and are indicative of an ongoing commitment on behalf of the Irish Government to evidence-based policy making.

Finally, in advance of the 2027 Census, the Central Statistics Office (CSO) has invited submissions on the content of the census form. Over 400 submissions were received, including on the topic of ethnicity. The CSO convened a Census Advisory Group (CAG), which met in June 2023 to discuss the submissions.

On 7 February 2024, the CAG recommended that a revised ethnicity question be tested in the Census Pilot Survey, which was held in September 2024. The Pilot provided an opportunity to test new and changed questions and to assess how successfully/accurately/comprehensively they were understood and answered. Analysis of the responses to the new and changed questions, including the ethnicity question, is currently underway. The results, including the results of the testing of the revised ethnicity question, will be presented to the CAG for final discussion and form content selection. This is expected to take place in Q1 and Q2 2025. Once agreed, the content of the form with new and changed questions will be submitted for Government approval in the second half of 2025.

The census question on ethnicity allows for a standardised approach to ethnic data collection. In line with best international practice, the categories in the ethnicity question are reviewed in advance of the census and can be updated if necessary to consider changes in the composition of the population.

Also relevant is the response to the recommendation at Paragraph 59 regarding the National Equality Data Strategy.

#### *Article 4 of the Framework Convention: Legal and institutional framework against discrimination*

**Paragraph 52. The Advisory Committee reiterates its call on the authorities to undertake all necessary measures, in close co-operation with relevant stakeholders, to improve access to justice by persons belonging to the Traveller community. This includes the repeal of Section 19 of the 2003 Intoxicating Liquor Act and granting the Workplace Relations Commission the competence in cases of discrimination in “places of entertainment”. The authorities should also amend legal aid legislation to provide the Legal Aid Board with the possibility to represent victims of discrimination in front of all relevant bodies.**

The Legal Aid Board Minceir/Traveller Legal Support Service established a dedicated legal support service, which provides specific legal services, including legal advice and representation to Travellers in certain areas of law that come within the scope of the Civil Legal Aid Act 1995. These include equality, equity, housing, nuisance, tort, contract, ejectment proceedings and enforcement of court orders. General family law matters are, however, dealt with within the nationwide Law Centre network.

The areas of practice within the service provided by the Legal Aid Board (“the Board”) include the provision of legal advice to Travellers in discrimination cases arising under the Equal Status Acts 2000-2018. Travellers may also seek legal advice and representation in cases related to discrimination in accessing licensed premises or clubs under Section 19 of the Intoxicating Liquor Act 2003, subject to the provisions of the Civil Legal Aid Act 1995 (as amended) and the Civil Legal Aid Regulations 1996 – 2021.

The Board has established a Consultative Panel to ensure, amongst other things, that the legal needs of the Traveller community are being met to the greatest extent possible within the terms of the Civil Legal Aid

Act 1995. Members of the Panel include representatives from a number of Traveller representative organisations.

The Board intends to become a more visible and vocal part of the communities it serves, to ensure that all of the people who are entitled to its support are aware that the Board is available and know how to access its services. This has resulted in local engagement as well as strategic engagement with key partners in the legal sector, the public service, and representative bodies. The Board is involved in a campaign of national public awareness to underline this work and is also carrying out a national mapping exercise to ensure that its service provision is correctly aligned with need.

As regards further work to raise awareness of remediation options, the National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS II) commits to strengthening the knowledge of, and effective access to, the equality remedies that are available to the Traveller and Roma communities. This includes the implementation of an information campaign in partnership with the Traveller and Roma national organisations to address rights in the areas of discrimination and inequality and the right to complain, as well as the avenues of complaint available.

The Department of Justice's Justice Plan 2022 committed to a comprehensive review of the Civil Legal Aid scheme. The review also comprises a deliverable under Action 8 of NTRIS II, which commits the Department of Justice to review the adequacy of existing supports for the provision of legal advice to Travellers and Roma. That commitment has led to the establishment of a Civil Legal Aid Review Group. The Board, as part of its submission to the Review Group, has recommended an amendment to the Civil Legal Aid Act 1995 (the "Act") to allow for representation in certain specified matters that presently lie outside the scope of the Act, to ensure all legal needs experienced by the Traveller community are met. This includes, most notably, an amendment to Section 28(9)(a)(ii) of the Act, which presently limits the extent of the service that the Board can provide in matters involving property and or land.

The Group is considering many aspects of the scheme, in line with its terms of reference. This includes the appropriateness of the current eligibility thresholds, the types of civil law cases which should be eligible for legal aid, whether the scheme should be extended to quasi-judicial fora currently not covered by it, and whether it should remain primarily a family law service. One such recommendation is the repeal of section 19 of the 2003 Intoxicating Liquor Act. The Department of Justice has agreed that the provision should be repealed and that cases of discrimination in "places of entertainment" should be dealt with by the Workplace Relations Commission. This was included in the draft General Scheme of the Equality (Miscellaneous Provisions) Bill 2024 prepared by the Department of Children, Equality, Disability, Integration and Youth.

Progress is ongoing and the Civil Legal Aid Review Group is expected to conclude its work in the near future, at which point its recommendations will be considered.

**Paragraph 53. The Advisory Committee strongly encourages the authorities to consider taking into account "accent" when providing protection under the Equality Acts against discrimination.**

In November 2024, the then Government approved, in principle, the introduction of a new equality ground of socio-economic disadvantage in the equality legislation following further tests to examine the potential impact, including on Small to Medium Enterprises (SME)s. It is intended that such a ground could be incorporated into the Equality (Miscellaneous Provisions) Bill 2025 during drafting. While the final wording may not refer specifically to 'accent', this ground, combined with the grounds of race and

membership of the Traveller community is expected to cover situations where a person's accent may be an important element in the discrimination faced.

*Article 4 of the Framework Convention: Equality data and “ethnic identifiers”*

**Paragraph 59. The Advisory Committee calls on the authorities to finalise and implement the upcoming National Equality Data Strategy. This strategy should ensure the development and implementation of ethnic equality monitoring across all relevant state departments, public bodies and complaint mechanisms, including through the use of a standardised “ethnic identifier”, in line with the international standards on data protection. The resulting data should be used for awareness raising and evidence-based policy making.**

The Central Statistics Office and the Department of Children, Equality, Disability, Integration and Youth have developed a National Equality Data Strategy that will put in place a strategic approach to improving the collection, disaggregation, and use of equality data. It is intended that the Strategy will provide a general approach for identifying and filling current gaps in equality data, as well as develop standard practices in classification. The Strategy is intended to improve the collection of equality data across all equality grounds and will improve the ability of public bodies to monitor the impact of relevant policies and initiatives. It is planned that the Strategy will be submitted to Government for approval in 2025.

*Article 4 of the Framework Convention: National Traveller and Roma inclusion strategy*

**Paragraph 64. The Advisory Committee strongly encourages the authorities to fully implement the National Traveller Roma Integration Strategy II 2024-2028 and its Action Plan for 2024-2026 with a stronger focus on results-based approach and adequate budget allocations, as well as cross governmental co-operation, participation of Traveller and Roma representatives and independent accountable monitoring structures.**

The National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS II) and related Action Plan 2024-2026 were launched in July 2024, by the then Minister for Children, Equality, Disability, Integration, and Youth, Roderic O’Gorman, T.D.

The development of NTRIS II was informed by a stronger outcomes focused approach than its predecessor Strategy. The Strategy incorporates a stronger implementation structure, with achievable actions and clear key performance indicators. NTRIS II will be implemented across two 2-year Action Plans to maintain a focus on delivery and outcomes.

To ensure high level political oversight, a new Steering Committee has been established with fewer members than its predecessor to retain a more strategic focus in discussing critical issues. As part of NTRIS II’s monitoring and reporting structure, the Steering Committee will report regularly to the Cabinet Committee on Social Affairs and Public Services, supported by the Senior Officials Group, as well as to the Oireachtas Committee on Children, Equality, Disability, Integration, and Youth. This will assist the process of ensuring the necessary resources are secured by Departments in the annual Estimates process to enable NTRIS II actions to be implemented.

There is provision for the close involvement of the Traveller and Roma communities as the new Strategy is implemented. There will be transparent quarterly public reporting on progress in delivering actions across all relevant Departments, State Agencies, and Traveller and Roma organisations; this will be supported by the publication of an annual report on progress.



Bilateral engagements with relevant Government Departments and relevant units of the Department of Children, Equality, Disability, Integration, and Youth are on-going to continue assisting and supporting the respective Departmental strategies relevant to NTRIS II.

*Article 4 of the Framework Convention: Intersectional discrimination*

**Paragraph 71. The Advisory Committee strongly encourages the authorities to ensure the inclusion of Traveller and Roma women’s needs and interests in wider gender policies and to take an integrated approach to actions targeting Traveller and Roma women and girls in the forthcoming National Strategy for Women and Girls that should be co-ordinated with the approach of the National Traveller and Roma Inclusion Strategy.**

The successor Strategy to the National Strategy for Women and Girls is currently under development within the Department of Children, Equality, Disability, Integration and Youth. The consultation phase for the next strategy has just concluded. The consultation included an online survey, stakeholder organisation workshops, and a National Youth Assembly on Gender Equality. Traveller and Roma organisations, including Traveller women organisations, were represented at both the stakeholder organisation workshops and a number of young Travellers participated in the National Youth Assembly as delegates. The next National Strategy for Women and Girls will co-ordinate with the National Traveller and Roma Inclusion Strategy II 2024-2028 with the aim of addressing intersectional discrimination for Traveller and Roma women.

**Paragraph 72. The Advisory Committee encourages the authorities to actively include and consult Traveller and Roma organisations in the work of the Third Domestic, Sexual and Gender-based Violence Strategy 2022-2026 and the work of its Agency (Cuan) and implement adequate resources related to Traveller and Roma women, both through targeted measures and through mainstreaming.**

In the Third National Strategy on Domestic, Sexual and Gender-Based Violence, the Traveller community is identified as a group requiring special measures. The Strategy recognises the need to reflect the lived experiences of particular cohorts of victims/survivors, including Travellers, and acknowledges the additional risk factors created by overlapping forms of discrimination. Actions in this Strategy include steps to increase access by Traveller women to domestic violence refuges and the establishment of a specialised group to advise on all interventions in terms of intersectionality and inclusivity for socially excluded groups, including Travellers and Roma.

Additionally, Cuan is in the process of setting up advisory structures to support the agency in its work progressing the Third National Strategy on Domestic, Sexual and Gender-Based Violence. A key priority for Cuan in 2025 is the establishment of an advisory group on the Strategy’s implementation, which will include representatives of the Traveller and Roma communities. Cuan also plans to work directly with Traveller and Roma representative groups on the development of tailored public awareness campaign materials and has already engaged directly with Pavee Point Traveller and Roma Centre in this regard. In relation to service development, Cuan expects to issue an Open Funding Call in early 2025 where Traveller and Roma services can apply to Cuan for the funding of specific initiatives to address domestic and sexual violence. Many of the mainstream domestic and sexual violence services that Cuan funds also work directly with members of the Traveller and Roma communities and women from migrant backgrounds. For example, Offaly Domestic Violence Support Services employs an Ethnic Minority Project Worker who has

overseen the establishment of the Ethnic Minority Domestic Abuse Observatory, which Cuan engaged with and funded in 2024.

*Article 5 of the Framework Convention: Support for the preservation and development of cultures and Traveller way of life*

**Paragraph 81. The Advisory Committee calls on the authorities to support persons belonging to the Traveller community in preserving and developing their identities and cultures by moving from project-based to more permanent and regular funding support, including for the creation of a permanent Traveller cultural centre.**

**Paragraph 82. The Advisory Committee encourages the authorities to develop and implement a plan to revitalise the Cant language, including through the production of media content in the Cant language, in order to allow its transmission to, and popularisation among younger generation, in co-operation with the Traveller community.**

The Irish Government notes the recommendations made by the Advisory Committee under this Article. It is to be noted that the Heritage Council, in its Strategic plan “Our Place in Time: Heritage Council Strategic Plan 2023– 2028”, has committed to working in partnership with the Traveller community to ensure that Traveller heritage is acknowledged and preserved. To this end, the Heritage Council committed to developing and delivering a national Traveller Heritage Plan, to establish a strong network of strategic, sustainable and community-led support for Traveller cultural heritage. To develop the national Traveller Heritage Strategy, the Heritage Council partnered with the Irish Traveller Movement to set up a working group, which comprises of the Heritage Council, Traveller representative organisations and Traveller representatives, and representatives of the Department of Children, Equality, Disability, Integration and Youth. The development of the Traveller Heritage Strategy is also a commitment under the National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS II), with the objective of ensuring ongoing, sustainable, and visible support for, and promotion of, Traveller and culture, heritage, and traditions, with a key focus on intergenerational initiatives, cultural continuity, and combatting stereotypes and misinformation about Travellers and in the wider community.

It is expected that the Traveller Heritage Strategy, which will also consider the use and promotion of the Cant language within the Traveller community, will be finalised in mid-2025.

Additionally, NTRIS II commits to continued support for the annual national and local Traveller Pride Week, International Roma Day, and European Roma Genocide Memorial Day. Most recently, in September 2024, the Roma Genocide remembrance event brought a range of people together, including individuals from the Traveller and Roma communities, policymakers, and civil society organisations, to commemorate the 80th Anniversary of the Roma Genocide. The speakers included Dr Ethel Brooks, Professor of Women’s, Gender and Sexual Studies at Rutgers University, USA, and Mr Christian Pfeil, Roma Genocide survivor, and family members of Roma Genocide victims.

NTRIS II also commits to improving access and funding opportunities for artists, designers and craftspeople from the Traveller and Roma communities and so promote positive self-identity, cultural continuity, contribution to contemporary arts and culture as well as the preservation of knowledge of traditional Traveller and Roma crafts and skills.

*Article 5 of the Framework Convention: Traveller culturally appropriate accommodation*

**Paragraph 93. The Advisory Committee urges the authorities at all levels to secure the availability of culturally appropriate accommodation for persons belonging to the Traveller community and to engage future Traveller residents in the design and the implementation of similar accommodation projects. The authorities should also repeal the trespass legislation and provide a network of transient accommodation sites.**

Progress has been made by Government in the delivery of Traveller accommodation, which is improving the accommodation outcomes for members of the Traveller community. Since the publication of the Expert Review in 2019, a total of over €100 million in capital funding has been spent on Traveller-specific accommodation. Under Budget 2025, a further €23 million has been made available for Traveller-specific accommodation. This represents a 59% increase in funding on the 2020 provision.

The local authority estimations for Traveller households in 2023 totalled almost 12,500 households. 79% of these Traveller households, which made up almost 10,000 Traveller families, were already accommodated through social housing supports ranging from standard local authority social housing to group housing schemes and halting sites. The remaining 21% of households included in the local authority estimations, making up just over 2,500 Traveller families, were accommodated through their own means. This demonstrates the very high level of accommodation support provided to members of the Traveller community.

In 2022, a new Regulation (S.I. 73) provided for the inclusion of a Traveller Identifier on the statutory Social Housing Support application form. This new measure is significantly improving data collection to assist local authorities in planning for the accommodation needs of Travellers, particularly Traveller-specific accommodation. The results of the 2023 Social Housing Needs Assessment reported for the second year with the Traveller Identifier and highlighted that 512 households identified as Irish Travellers. 6% of these households selected a preference for Traveller-specific accommodation, whereas 66% selected a preference for social housing. It is expected to take at least two years for all new and revised applications to respond to this new question.

The Department of Housing, Local Government, and Heritage is engaged in preparing up to date guidelines on the design of Traveller-specific accommodation (informed by independent research), which will include a focus on consulting with the tenants being accommodated.

As outlined in the comments on the recommendation under Article 15, Paragraph 180, a joint project with the Northern Ireland Housing Executive to explore collaboratively the feasibility of an all-island approach to the provision of a network of transient accommodation sites is presently in development.

*Article 6 of the Framework Convention: Intercultural dialogue and mutual respect*

**Paragraph 101. The Advisory Committee asks the authorities to substantially increase their efforts to promote mutual respect, intercultural dialogue and understanding in society in relation to persons belonging to the Traveller and Roma communities through, among others, awareness raising activities among the general population and targeted measures in the fields of education and media.**

The Irish Human Rights and Equality Commission has a statutory function to encourage the development of a culture of respect for human rights, equality, and intercultural understanding in the State, to promote understanding and awareness of the importance of human rights and equality, to encourage good practice

in intercultural relations, to promote tolerance and acceptance of diversity in the State and respect for the freedom and dignity of each person, and to work towards the elimination of human rights abuses, discrimination and prohibited conduct.

A national public education and anti-racism awareness campaign will be initiated in 2025, within the framework of the National Action Plan Against Racism (NAPAR), to support NAPAR's objectives and this campaign will include the Traveller and Roma communities.

In addition, the National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS II) and related Action Plan commit to planning and delivering public services in a context of cultural competence, with due regard to Traveller and Roma cultural identity and to the requirements of the Public Sector Equality and Human Rights Duty (the 'Public Sector Duty'). Specifically, all Departments, Agencies, and State-funded organisations that provide public services to Travellers and Roma must deliver and ensure take up of cultural awareness training for all staff who engage with families and individuals from the Traveller and Roma communities.

Where Traveller and Roma organisations are concerned that a public body, whether national or local, is failing to perform its functions in accordance with the requirements of the Public Sector Duty, they have the option to lodge a submission under the Irish Human Rights and Equality Commission Act, 2014. Under NTRIS II, there is a commitment to review the implementation of the Public Sector Duty with reference to its overall impact, including for the Traveller and Roma communities.

Additional actions under NTRIS II Theme 8 (Culture, Heritage, and Identity) aim to promote intercultural dialogue and understanding. These include addressing the negative stereotyping of Travellers and Roma in the reporting of issues across all media platforms and promoting and supporting media understanding of the nature and impact of media representation of minority ethnic groups. Furthermore, in each of the four years of NTRIS II, two international exchanges will be facilitated, in recognition of the wider cultural interlinkages that Travellers have with Traveller communities in Northern Ireland and Britain, and that Roma have with the wider European Roma community. These international exchanges will help to deepen cultural understanding and will build the capacity of Traveller and Roma organisations to represent, and to advocate on behalf of, their communities.

As outlined in the comments under Article 12, Paragraph 147, in addition to work undertaken under NAPAR and NTRIS II, a range of initiatives are being taken to improve intercultural understanding in the field of education. This includes the Traveller and Roma Education Strategy 2024-2030. This six-year strategy aims to build on ongoing work across the continuum of education, including early learning and childcare, school (primary and post-primary) and further and higher education, to improve outcomes and ensure equity of access, opportunity, and outcomes, as well as meaningful participation, for all Travellers and Roma.

#### *Article 6 of the Framework Convention: Protection from hostility, hate crime and hate speech*

**Paragraph 111. The Advisory Committee urges the authorities to take active measures to combat and condemn acts of hostility, hate crime and hate speech towards persons belonging to the Traveller and Roma communities. The authorities should ensure a robust implementation of hate crime legislation and in particular ensure that racially or ethnically motivated attacks, including when based on an "accent" attributed to the Travellers, are adequately identified, effectively investigated and prosecuted.**

The Criminal Justice (Hate Offences) Act 2024 was signed into law on 29 October 2024 and provides for hate crime offences. The Act creates specific, aggravated forms of certain existing criminal offences, where those offences are motivated by hatred of a protected characteristic, or when hatred was demonstrated at the time of committing the offence.

The protected characteristics that underpin the 2024 Act are race; colour; nationality; descent; religion; ethnic or national origin; sexual orientation; sex characteristics; gender (including gender expression or gender identity); and disability. The protected characteristic of “national or ethnic origin” specifically references membership of the Traveller community (within the meaning of section 2(1) of the Equal Status Act 2000) in the new legislation. Members of the Roma community are also protected by way of their national or ethnic origin.

The aggravated offences generally carry an enhanced penalty, compared to the ordinary offence, and the record of any conviction for such an offence would clearly state that the offence was motivated by hatred. There is a further provision for any other criminal offence, where a specific hate-aggravated form of the offence has not been created, but where the court finds the offence was motivated by hatred. In these cases, the court must consider the hate motive as an aggravating factor at sentencing, and this must be placed on the formal record.

The Prohibition of Incitement to Hatred Act 1989 provides protection from hate speech for members of the Traveller and Roma communities on the basis of ethnicity, national origin and membership of the travelling community through the meaning of hatred set out in the Act: “hatred” means hatred against a group of persons in the state or elsewhere on account of their race, colour, nationality, religion, ethnic or national origins, membership of the travelling community or sexual orientation”.

**Paragraph 112. The Advisory Committee asks the authorities to ensure that the National Action Plan Against Racism is afforded multi-annual adequate funding to support its effective implementation. The authorities should further ensure that this action plan has a specific focus on anti-Traveller and anti-Roma racism with a dedicated budget, a strong monitoring framework and is implemented in co-operation with Traveller and Roma organisations.**

The actions within the National Action Plan Against Racism (NAPAR) are intended to apply to all individuals and groups in Ireland who are experiencing racism. The NAPAR is explicit in stating that “each action should be understood to encompass all individuals and groups experiencing racism” (NAPAR, page 7). There was strong Traveller and Roma representation on the independent Anti-Racism Committee that developed the NAPAR, and there are also Traveller and Roma representatives on the new Advisory Committee on Racism and Racial Equality, which has the role of monitoring the NAPAR. This will help to ensure that these communities continue to have an active voice and role in the implementation of the NAPAR over the coming years.

The Ireland Against Racism Fund, launched in May 2023, is an important element in supporting the implementation of the NAPAR, which was published on 21 March 2023. The funding call arises from Action 2.14 of the NAPAR which states: “Provide funding for national and local initiatives that aim to combat racism and foster racial equality and community cohesion, in order to support the implementation of this plan and the achievement of its objectives”. In its first year, the fund made €1.3 million available to applicant groups operating at national, regional and local level. In October 2024, the Minister of State for Community Development, Integration and Charities announced that 28 projects were set to receive a further €1.1 million in funding under the Ireland Against Racism Fund 2024.

Additionally, the National Traveller and Roma Inclusion Strategy II 2024-2028 commits that the Special Rapporteur on Racial Equality and Racism under NAPAR will report on the progress being made towards achieving the objectives of NAPAR insofar as the Traveller and Roma communities are concerned.

*Article 6 of the Framework Convention: Law enforcement and racial profiling*

**Paragraph 120. The Advisory Committee calls on the authorities to identify and address the contributing factors for the over-representation of Travellers in prison for minor offences, including by making use of the alternatives to criminal convictions and imprisonment as provided for in the 2014 Fines (Payment and Recovery) Act.**

The Review of Policy Options for Prison & Penal Reform 2022-2024, as approved by Government in August 2022, recognises the growing body of evidence showing that short-term prison sentences are not an effective measure for reducing the risk of reoffending. Accordingly, Priority Action 2 of the accompanying Action Plan aims to develop and expand a range of community-based sanctions, including alternatives to imprisonment.

In implementing Priority Action 2, the Department of Justice has undertaken a policy review of the Criminal Justice (Community Sanctions) Bill 2014 and, in 2023, published a policy paper on Restorative Justice, *Promoting and supporting the provision of Restorative Justice at all stages of the criminal justice system*. Furthermore, in November 2024, the Department of Justice published *Community or Custody? A Review of Evidence and Sentencers' Perspectives on Community Service Orders and Short-term Prison Sentences* (Maguire & Carr, 2024). The report examines the impact of the Criminal Justice (Community Service) (Amendment) Act 2011, which aimed to encourage greater use of Community Service Orders for people convicted of minor crimes for which a sentence of imprisonment is deemed appropriate. The findings of this research will inform the Department's work in the area of penal policy.

**Paragraph 121. The Advisory Committee encourages the authorities to develop special measures for early intervention, and pre- and post-prison release support within the Traveller community, particularly for Traveller mothers.**

The Youth Justice Strategy 2021-2027 recognises that disadvantage and diversity issues underlie the involvement of children and young people with the criminal justice system. The strategy commits to ensuring that Youth Diversion Projects reach all relevant young people, including those from Traveller and Roma communities. These supports typically target youth diversion for 12- to 18-year-olds but also include youth diversion early intervention from ages 8 to 11. The Department of Justice currently funds a model of support for Traveller women in the criminal justice system and their families from the Traveller Justice Initiative (TJI), the National Traveller Women's Forum (NTWF) and Barnardos. This model is operating on a pilot basis for a period of three years and is being delivered by Barnardos, in partnership with NTWF and Traveller Justice Ireland.

This model of support arises from work that the TJI has undertaken on the needs of Traveller women in the criminal justice system and their families, the NTWF's work in delivering peer support for Traveller women in Dóchas prison since April 2017, and wider research undertaken by the Irish Penal Reform Trust.

This service is a trauma-informed flexible model of support designed to meet the wide range of needs of Traveller women as well as their families. Barnardos employs a worker to meet these needs, whose functions include, but are not limited to:

- Developing relationships with Traveller women in the criminal justice system to identify their needs as parents.
- Developing individual plans with Traveller women and their families.
- Providing practical supports, including the coordination and liaison with a range of criminal justice and community-based services.
- Providing support in building and strengthening individual family and community networks.
- Providing support at each stage of the criminal justice system (pre-sentence, probation, pre-release, and post-release).

In addition, Meath Travellers Workshop is currently funded by the Irish Prison Service to carry out a Traveller Peer Support initiative, which attends Wheatfield Prison one day per week and has evidenced positive uptake thus far. Each week, the group engages with 12 participants, and the demand for places is very high.

Currently there are Traveller organisations facilitating other peer support work in Wheatfield, Dóchas, Mountjoy, the Midlands and Limerick prisons.

**Paragraph 122. The Advisory Committee invites the authorities to extend good practices in preventing recidivism, improving inmate physical and mental health and strengthening cultural identity, such as the equine programme, targeting in particular Traveller inmates.**

The Department of Justice chairs the Steering Committee responsible for overseeing the implementation of recommendations made in the Health Needs Assessment for the Irish Prison Service (Crowe, 2022). The Committee published its first progress report in October 2024, providing an overview of progress made in the following areas:

- Women’s Health Services;
- Mental Health Services;
- Addiction and Substance Misuse;
- Prisoner Categories with Specific Health Needs;
- Strengthening and Providing Governance to IPS Healthcare Services.

In 2022, the Department of Justice and the Department of Health jointly published the report and recommendations of a High-Level Taskforce, the recommendations of which emphasised the shared responsibility of Government Departments and Agencies to deliver on meeting the needs of those with mental health and addiction challenges who come into contact with the criminal justice system. The first annual progress report was published in February 2024 and the second is due to be finalised shortly.

The Irish Prison Service (IPS) is currently developing a Healthy Prisons initiative. This initiative is progressing through the Healthy Prisons Working Group, on which the Department of Justice is represented alongside representatives from the IPS, the Department of Health, the Health Service Executive and the Institute for Public Health.

In November 2024, the Department of Justice, along with the IPS and the Probation Service, launched *Building Pathways Together: Criminal Justice Reintegration Through Employment Strategy 2025-2027*. The strategy, developed in consultation with key stakeholders, seeks to provide effective interventions to ensure that those who have ceased offending, and those who are looking for stability to move away from a life which involves offending, have the appropriate supports and opportunities open to them to make the success of their endeavours more likely.

The Equine Unit at Castlerea Prison is an innovative collaboration between the IPS and the equine industry. The programme, which is a first of its kind in Europe, targets all prisoners. However, there is a high level of interest in the programme from Traveller men in Castlerea and in other locations. Prisoners from Castlerea Prison attend the Equine Centre daily and are currently engaged in the Horse Care and Welfare programme. The course is specially designed for delivery to students with literacy issues and is delivered visually with voice over and assisted with the use of diagrams. This is an accredited programme, which has been endorsed by the Racing Academy and Centre of Education. Prisoners face many barriers to successful integration back into society. The equine programme can have a positive impact on physical and mental wellbeing, offer preparation for employment and ultimately make communities safer through a reduction in reoffending.

Finally, cultural competence and Traveller inclusion training is to be delivered by the Traveller Justice Initiative to prison staff working with women prisoners.

#### *Article 9 of the Framework Convention: Presence of Travellers in the media*

**Paragraph 127. The Advisory Committee asks the authorities to ensure that the RTÉ effectively represents Traveller identities and cultures as part of Ireland’s overall diversity and that persons belonging to the Traveller community are employed as presenters and developers of programmes.**

Coimisiún na Meán is continuing to support and facilitate the Equality and Diversity strategies and initiatives of the sector through media development initiatives. A Gender, Equality, Diversity and Inclusion (GEDI) Strategy for the Audio and Audiovisual Media Sector was published in July 2024. A key objective is to foster a media landscape that is representative of, and accessible to, the diversity of Irish society. Principles and actions relating to minority and under-represented groups/communities are included. Additionally, An Coimisiún is presently developing Equality, Diversity and Inclusion Standards for specific funding schemes, which will be piloted in 2025.

Section 98 of the Broadcasting Act 2009 affords RTÉ and TG4 independence in the pursuance of their public objects. In practice, this means that RTÉ are responsible for setting their own commitments and targets (pursuant to section 102 of the 2009 Act), which includes metrics relating to GEDI. RTÉ publishes its reports on the broadcaster’s performance against these metrics via its Annual Reports and Annual Statement of Performance Commitments. In determining public funding recommendations for RTÉ, Coimisiún na Meán reviews RTÉ’s performance against these metrics on an Annual and Five-Year basis, where GEDI (including Traveller and Roma Inclusion strategies) is a constituent part of this performance measurement process. Draft legislation is currently being prepared by Government which will give Coimisiún na Meán a more prominent role in identifying key performance areas of RTÉ and TG4. Coimisiún na Meán will, accordingly, consider the role of GEDI metrics, including Traveller and Roma inclusion, in designing this new regulatory framework.



In addition to the work of Coimisiún na Meán, the National Action Plan Against Racism asserts that enabling minority participation is a fundamental priority. It promotes enabling minority ethnic people to be fully visible and active participants in all aspects of Irish life, including the media.

RTÉ has broadcast three documentaries relevant to the experience of Travellers over the past 18 months: *Patrick: A Young Traveller Lost* (aired 27 November 2023); *Songlines* (aired 2 May 2024); and *Mincéir* (aired 27 August 2024).

### *Article 12 of the Framework Convention: Access to quality education*

**Paragraph 139. The Advisory Committee urges the authorities to address, within the framework of the Traveller and Roma Education Strategy 2024-2030, the very extensive educational disadvantages experienced by Travellers and Roma at all educational levels. It expects the authorities to ensure that the strategy has a robust implementation and monitoring plan coupled with adequate resources, as well as a consultative structure to secure its implementation. The authorities should also make statutory the guidelines for reduced timetables and monitor and prevent their disproportionate use for Traveller and Roma children and the subsequent negative impact on their education.**

The Traveller and Roma Education Strategy 2024-2030 (TRES), alongside the Plan for Implementation and Action for 2024-2026, was published on 16 July 2024 by the Department of Education and is co-sponsored by the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY). TRES reflects a collective commitment across Government to advance progress on education for Traveller and Roma individuals and aims to build on ongoing work across the continuum of education to improve outcomes and ensure equity of access, opportunity, and outcomes, as well as meaningful participation, for all Travellers and Roma. The Strategy recognises that educational outcomes for Travellers and Roma, whilst they have improved considerably in the last six years, are significantly lower than those of the general population.

TRES contains a number of key actions to address the disadvantage faced by Travellers and Roma and improve educational outcomes for both communities, grouped under four themes: Participation and Experience; Access and Outcomes; Partnership; and Delivering Change.

TRES provides for 15 Traveller and Roma Community Link Workers who will work in partnership with schools, families and communities to support and promote improved attendance, participation and retention. The role of the Community Link Workers will include working to increase children and young people's sense of belonging and pride in their identity; supporting the engagement of parents/families with education; increasing school engagement with and awareness of these cohorts; and signposting and linking families to community services.

Support will continue to be provided to schools to ensure that their admission policies are compliant with all aspects of the Education (Admission to Schools) Act 2018, including with regard to non-discrimination, and to ensure awareness of parents and guardians in the Traveller and Roma communities around school admissions, including rights and obligations. Targeted information on rights, obligations and appeals in relation to suspensions and expulsions by schools will be produced to ensure that Traveller and Roma parents, guardians and organisations have accessible information about the education system. The information series will include a range of topics including Admissions Policy, Reduced School Days, Inspections, and any other topics as they arise.

As part of the rollout of TRES, two National TRES co-ordinators are being recruited to support the implementation of actions as part of the strategy's Plan for Implementation and Action 2024-2026. Consultation with stakeholders lies at the heart of the Strategy and takes place with Traveller and Roma representative groups via the Traveller and Roma Education Forum, also led by the Department of Education, with active participation from DCEDIY and DFHERIS as relates to the recommendations in the Strategy for the further and higher education sectors and where collaboration across the three key Departments, DCEDIY, DFHERIS and the Department of Education, is required.

A TRES Oversight Group has been established to ensure good governance through regular monitoring and oversight of progress against actions contained in TRES. The TRES Oversight Group comprises membership from the Traveller and Roma organisations and an independent co-chair. The frequency of the meetings will be agreed by the group but will not be less than three times per year. A progress report will be completed for each meeting including an annual report to be published on the TRES website. The TRES implementation plans will be reviewed every two years in 2026 and 2028. To avoid duplication and ensure alignment of the aims and objectives, the education-based actions contained under the National Traveller and Roma Inclusion Strategy 2024 – 2028 (NTRIS II) will be monitored within the TRES Oversight Group and reported on at the NTRIS II Steering Committee.

The use of Reduced School Days continues to be monitored by the Department of Education. The Department has appointed a steering group who oversee the development and implementation of the Reduced School Day scheme. The group encompasses knowledge across the Department, including the Inspectorate and National Educational Psychological Service (NEPS).

The use of the Reduced School Day Guidelines is recorded and monitored by Tusla Education Support Service, which has regular meetings with the Department. The anonymised data includes the voluntarily declared ethnic identifier and is passed to the Department at intervals during the year so that trends can be established and circulated to the Steering Group for consideration.

The inspectors and NEPS psychologists raise the use of the Reduced School Day during their meetings or inspections in schools. The Inspectorate also conduct dedicated inspections in schools with high numbers of children from Traveller and Roma backgrounds. These inspections have a specific focus on attendance, use of the Reduced School Day, and literacy for Traveller and Roma children and young people. They also promote the video to inform parents of Traveller children of their rights in respect of Reduced School Days.

The Department continues to publish an annual report on the use of the Reduced School Day. This commenced in September 2023 with a report on the Reduced School Day notifications between January to June 2022, and the 2022/2023 school year. The report for 2023/2024 school year will be available shortly.

As regards early education, Equal Start was launched by DCEDIY in early 2024 as a new model of government-funded supports to ensure that children experiencing disadvantage can access and meaningfully participate in early learning and childcare. Traveller and Roma children are one of the target groups who benefit from the child-targeted supports and the evidence-based practices, programmes, and policies of Equal Start. The commitments in TRES are actions within the Equal Start model.

In 2023, DCEDIY introduced an ethnic identifier for children availing of the National Childcare Scheme and children in the Early Childhood Care and Education Programme. Parents/guardians can choose to complete this optional field for their children, and this information is used to allocate resources to services through Equal Start. This data will also be used to monitor the participation of Traveller and Roma children and track progress over time.

DCEDIY is currently developing a monitoring and evaluation framework to monitor the effectiveness of the Equal Start model as a policy response to countering the impact of socio-economic and other forms of disadvantage on access to early learning and childcare, and addressing educational disadvantage in an Early Learning and Care context.

As regards further and higher education, the National Access Plan 2022-2028 (NAP) has set the target for an increase in the number of Traveller new entrants to higher education from 33 to 150, which represents around 0.32% of the new entrant population. It is acknowledged that Traveller participation in Higher Education should be much higher. However, given the current baseline data, it is felt that this new target is reasonable. This target will be reviewed during a mid-term review stage of NAP in 2025.

As part of the NAP, Path 5 funding will support institutions in building long term relationships with Traveller and Roma communities. It will enable Higher Education Institutions to build infrastructure to increase participation while supporting the achievement of the targets identified in the NAP. It also provided €1.35m fund over three years between 2022 and 2024.

**Paragraph 140. The Advisory Committee calls on the authorities to systematically prevent and tackle school dropouts, including through effectively addressing all forms of bullying, as well as real or perceived discrimination faced by Traveller and Roma children in schools, by fully implementing the Cineáltas - Action Plan on Bullying, coupled with effective monitoring mechanisms and in cooperation and partnership with Traveller and Roma organisations.**

All early learning and childcare (ELC) services must adhere to the Diversity, Equality and Inclusion (DEI) Charter and Guidelines. As part of the implementation of Equal Start, the DEI Charter and Guidelines are being updated to ensure full inclusion of all children and their families in ELC services, with a focus on minority cultures, and in particular Traveller and Roma families, including and enhancing engagement with parents.

Under Equal Start, there is a commitment to review the role of the Inclusion Coordinator and LINC training. The role of the Inclusion Coordinator, which presently leads inclusive practice, inclusive pedagogy, and an inclusive culture within the early learning care setting by providing both support and information to staff and parents on inclusion of all children, will be expanded and given greater responsibility for access and inclusion for children from disadvantaged backgrounds, including Equal Start target groups. (i.e. children living in disadvantaged areas, Traveller children, Roma children, children availing of the National Childcare Scheme through a sponsor body, children experiencing homelessness and children in the International Protection system).

The Traveller and Roma Education Strategy 2024-2030 will support Traveller and Roma children and young people at the transition points in the school system by funding targeted transition supports through Tusla Education Support Services. There will be a focus within resources on transitions to post-primary school and progression and retention beyond year three of Junior Cycle into and through Senior Cycle and to the Leaving Certificate examination.

Finally, Cineáltas: Action Plan on Bullying was launched on 1 December 2022. Cineáltas is the Department of Education's whole-education approach to preventing and addressing bullying in schools. An Implementation Plan for Cineáltas was published on 10 April 2023 and commits to implementing each of its 61 actions within a 5-year period. An Implementation and Evaluation Group has been established to oversee implementation of the actions and the publication of annual implementation and evaluation reports,

informed by feedback from children and young people, parents, school staff, education partners, key stakeholders, and relevant agencies. This group is chaired by the Secretary General of the Department of Education. One of the more significant actions in Cineáltas was to update the anti-bullying procedures for schools.

The Bí Cineálta Procedures to Prevent and Address Bullying Behaviour for Primary, and Post-Primary Schools were published on 19 June 2024. These ‘Bí Cineálta’ (‘Be Kind’) procedures were developed in collaboration with the education partners and are heavily informed by the views of children and young people, parents, school staff, board of management members and the wider education community. The Bí Cineálta Procedures are centred on a child rights-based approach and support a partnership approach where all members of the school community work together to prevent and address bullying behaviour. The procedures have been updated to take account of gender identity bullying, cyberbullying, racist bullying, sexist bullying, and sexual harassment. They support schools to develop clear strategies to prevent and address these bullying behaviours.

Under Cineáltas, a Traveller culture and history research report was published by the National Council for Curriculum and Assessment (NCCA) in March 2023. Additionally, the Department’s teacher support service, Oide, has also developed a new seminar for teachers and school leaders entitled: *Fostering a Culture of Inclusion*.

As part of Cineáltas, the Department of Education is progressing the development of a national database to facilitate data on bullying behaviour being collated in an anonymised manner with a view to informing an annual national report on bullying behaviour in schools. This information will not identify individual schools or students.

**Paragraph 141. The Advisory Committee encourages the authorities to further extend maintenance support and the SUSI grant fees to all Traveller and Roma students who are accepted to third level courses part-time and full time, so as to increase the numbers of these persons in tertiary education.**

The Traveller and Roma Education Strategy 2024-2030 (TRES) has been developed to provide direction for the whole education system, including early learning and childcare, primary and post-primary school, further, higher, and lifelong education through cross-departmental collaboration between the Department of Education, the Department of Children, Equality, Disability, Integration and Youth and the Department of Further and Higher Education, Research, Innovation and Science. One of the key actions under TRES will include increasing the number of young people remaining in school to final year and achieving a Leaving Certificate. This will provide more opportunities for these students to progress into tertiary education. TRES also includes an action in relation to developing a national student accommodation strategy and scheme for the delivery of state-supported student accommodation with targeted accommodation supports for Traveller and Roma students to enable inclusive participation in higher education.

There are currently no plans to extend the Student Grant Scheme outside of the parameters that are currently in place. Student Grants are available to eligible applicants attending approved full time Post Leaving certificate courses, Undergraduate and Postgraduate courses who satisfy various criteria including a means test, residency, nationality, and progression. The grants include Maintenance Grants, Fee Grants and Student contribution grants. The Government has instigated improvements to the student grant scheme over the previous two budgets, increasing both the income thresholds and rate of grant available.

*Article 12 of the Framework Convention: Intercultural education, school curriculum and assessment*

**Paragraph 147. The Advisory Committee calls on the authorities to ensure that information about the cultures, traditions, histories and languages of Travellers and Roma and their integral and valued role in Ireland’s society is reinforced in school curricula, educational materials and in accompanying training of teachers and other education professionals.**

The National Council for Curriculum and Assessment (NCCA) published a draft audit report of Traveller Culture and History in the Curriculum in June 2019. This curriculum audit focused on identifying current opportunities across the early childhood, primary and post-primary curricula for children and young people to encounter and learn about aspects of Traveller culture and history.

In order to capture what the Traveller community identifies as being key aspects of their culture and history, a research report was developed by the NCCA in collaboration with an expert group comprising members of the Traveller community and Traveller representatives as part of the NCCA’s commitment to developing resources and materials for schools and early childhood settings. The report was published by the NCCA in February 2023.

The NCCA gathered examples of practice in teaching and learning about aspects of Traveller culture and history contained within the report. These were gathered from early childhood settings, primary schools, and post-primary schools, as a means of augmenting the research report and illustrating how it can support teaching and learning about Traveller culture and history within the curriculum. Based on this, the NCCA have developed and produced a 25-minute film guidance for teachers, which is due to be published shortly. This film is focused on providing guidance to educators and school leaders on the approach to teaching Traveller culture and history. Additionally, the NCCA are developing ancillary resources based on various themes identified by contributors to the film. These will be published on the NCCA website early in 2025.

Work is also ongoing by the NCCA on a review and redevelopment of the Intercultural Guidelines for primary and post-primary schools, in order to support the further integration of intercultural education in the curriculum. This will link in with relevant aspects of culture and history included in the research report.

Finally, the NCCA have identified three early childhood settings that they will be visiting early in 2025 to film and report on approaches to teaching Traveller culture and history. This work will link with the key principles of Aistear, the curriculum framework for all children from birth to six years used in early learning and care (ELC) and will entail collaboration with Aistear curriculum developers. As with the primary and post primary resources, NCCA will be developing support materials for early childhood as well.

In addition to the work being undertaken by the NCCA, it is worth noting that Aistear was updated in 2024 to recognise and reflect societal and policy changes that have taken place since the publication of the original Framework in 2009. One of the main updates includes a celebration of the diversity of contemporary Irish society and support for the meaningful inclusion and participation of all babies, toddlers, and young children.

Better Start National Early Years Quality Development is an initiative to promote and enhance inclusive high-quality, ELC for children from birth to six years of age in Ireland. As part of Phase 1 of Equal Start, two Early Years Specialists will be appointed to Better Start to provide guidance and support to services to ensure more equitable access and participation for Traveller and Roma children.

*Article 15 of the Framework Convention: Effective participation in public life*

**Paragraph 153. The Advisory Committee asks the authorities to undertake legislative and practical measures to ensure the effective participation of persons belonging to the Traveller community, including women, in different spheres of public life, at national and local levels, for example by considering designating a permanent seat for Travellers in the Seanad.**

**Paragraph 154. The Advisory Committee encourages the authorities to undertake special measures to promote the inclusion of Traveller and Roma interests, including women's, in policies, programmes and initiatives undertaken by local authorities.**

An Coimisiún Toghcháin (The Electoral Commission), established in February 2023, is legislatively tasked with promoting public awareness of, and participation in, the State's electoral and democratic processes and encouraging the public to vote at electoral events. In addition to delivering educational and information programmes, the Commission's work includes promoting participation in electoral processes by under-represented groups in society.

In addition, there are a number of strategic objectives in the National Traveller and Roma Inclusion Strategy II 2024-2028 that commit Government Departments, Agencies and NGOs to promoting and improving the inclusion of Travellers and Roma in the political and economic life of Ireland. The actions associated with these objectives, which fall under Theme 9 of the strategy, Participation, Empowerment, Cooperation, and Accountability, include promoting the adequate representation of Travellers at local level, supporting the development of a network of Roma-led organisations with competence to represent, and advocate on behalf of, local Roma communities, and increasing the engagement of both communities with the democratic process.

Amongst the actions developed to deliver on these strategic objectives, the National Traveller organisations, supported by the relevant Government Departments, are to carry out an audit of local representative structures with the aim of identifying gaps in local structures and making recommendations in relation to providing additional supports, as appropriate.

A further action involves assessing, through consultation with the National Roma Network and Roma organisations, the advocacy and local representation needs of Roma communities at local level and to make recommendations, as appropriate, towards the extension of the network of existing Roma organisations. Work has already begun on this latter action, with further work planned for 2025.

Senator Eileen Flynn, a member of the Traveller community, was elected to Seanad Éireann (the upper house of Ireland's parliament) in January 2025, having served as a Senator by means of nomination by the Taoiseach (Prime Minister) since 2020.

*Article 15 of the Framework Convention: Effective participation in socio-economic life: access to employment and social protection (Article 15)*

**Paragraph 161. The Advisory Committee calls on the authorities to support the Traveller economy and Traveller-led social enterprises for example via a dedicated business support scheme. The authorities should also support the development of a national Traveller and Roma employment strategy in a timely fashion to tackle their unemployment.**

The stated strategic outcomes of the National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS II) in the field of employment are that: Travellers and Roma have equal access to quality and sustainable employment; entrepreneurship and self-employment opportunities for Travellers and Roma are supported; and there is a positive and inclusive workplace culture where diversity is valued, and every individual is treated with respect and dignity. The NTRIS II Employment Sub-Committee, which includes representatives of Traveller and Roma representatives as well as all relevant Government Departments, advises on implementation of the strategy's employment actions.

NTRIS II commits to expanding and improving the national coordination of the Special Initiative for Travellers (SIT), a locally-based service which provides practical approaches to redressing the significant level of Traveller unemployment, to support Travellers already engaged in the Traveller economy and provide other supports, including training, to address the needs of Travellers.

The Civil Service Traveller and Roma Internship Programme, which is led by the Department of Justice, seeks to extend the pilot scheme introduced in 2023 by increasing the number of both participants and employing Departments, and by creating a pathway to permanent employment. The next iteration of the Programme is being progressed on a cross-Department basis and will be launched later in 2025 with the support of Traveller and Roma organisations. NTRIS II commits to developing a wider public service internship programme for Travellers and Roma also in 2025.

The Department of Social Protection (DSP), through NTRIS II and otherwise, is taking steps to address the high levels of unemployment among members of the Traveller community with the aim of increasing the Traveller employment rate by fifty percent to 27% and the employment rate for Traveller women, in particular, by fifty percent to 24% by Census 2027.

Under Pathways to Work 2021-2025, the national employment services strategy, the DSP promotes and supports pathways to employment and self-employment for jobseekers, including those of Traveller and Roma ethnicity, through a number of mainstream schemes. These include, but are not limited to, the Back to Work Enterprise Allowance; the Short-Term Enterprise Allowance; and the Jobseeker's Benefit Self-Employed.

The JobsPlus scheme encourages employers and businesses to focus their recruitment efforts on those who have been out of work for long periods and on young people seeking employment. It provides a direct monthly financial incentive to employers over 18 months, with two levels of grant payable - €7,500 or €10,000, provided that the employment is maintained. Since January 2023, the higher-level grant of €10,000 is payable to an employer who recruits a jobseeker who is a Traveller, or of Roma ethnicity.

The DSP continues to fund community development projects under the Community Employment (CE) scheme with the stated aim of providing specific employment opportunities for Travellers and Roma. Sponsoring organisations contract with the Department, on an annual basis, to provide jobseekers and other vulnerable groups with good quality work experience and training qualifications to support their progression into employment. The Traveller-specific CE schemes offer special incentives for Traveller and Roma participation in work programmes. While Travellers can also qualify under the general CE scheme criteria, clients are not obliged to self-identify as members of the Traveller community and must satisfy the standard more stringent entry criteria to qualify.

There is no obligation on clients to identify their ethnicity to access activation services. This data input is optional, depends on self-identification and therefore available records may be under-representative of participation and interests.

Department officials are currently in discussions regarding four new Roma-specific CE schemes around the country. Extra funding for supervision will be provided, if necessary, to support these groups.

A Traveller and Roma Employment Services Consultative Forum was formed in December 2022 with representatives from several Traveller and Roma groups. The purpose of the Forum includes, but is not limited to, providing a vehicle to offer feedback on current and proposed employment services and operations with a view to improving the customer experience and outcomes of Traveller and Roma customers. It also explores how to better address barriers to employment that have been identified. For example, the Forum identified a requirement for the delivery of appropriate Traveller and Roma led cultural awareness training for DSP Employment Services Staff; this training is now in process.

The DSP has begun hosting Work Placement Experience Programme (WPEP) placements in a range of business areas across the Department. By end 2024, 13 participants had started their placements, two of whom self-identify as a Traveller. An additional 7 participants are currently undergoing Garda vetting before commencing their placement, and one of these self-identifies as a Traveller. DSP Employer Relations will continue to engage with Traveller and Roma representative organisations to identify suitable WPEP candidates. During the placements and as part of their learning and development plan, participants are supported to make applications for Temporary and Permanent Clerical Officer Positions in the Civil Service and to explore job opportunities in the wider labour market.

Work has commenced to develop a successor Pathways to Work strategy for the period 2026-2030. The strategy will be informed by a public consultation process and engagement with the community and voluntary pillar, including organisations representing the Traveller and Roma communities.

In addition, the DSP is working with the Central Statistics Office to examine the available evidence for employment, engagement with DSP schemes, and other labour market outcomes for Travellers and Roma. Preliminary results are expected by end Q1 2025.

The Department of Rural and Community Development (DRCD) oversees the Social Inclusion and Community Activation Programme (SICAP), Ireland's primary social inclusion intervention programme. SICAP is co-funded by the Irish Government and the European Social Fund Plus, under the Employment, Inclusion, Skills and Training (EIST) Programme 2021-2027. The overall aims and objectives of the Programme are to reduce poverty and promote social inclusion and equality in Ireland through supporting communities and individuals using community development approaches, engagement, and collaboration. Travellers and Roma were each distinctly named SICAP target groups under SICAP 2018-2023. As part of a mid-programme review in 2021, Travellers and/or Roma were named as one of the national priority groups for SICAP as well as a priority area across 19 programme Contract Areas. Much of the initial work across SICAP 2018-2023 focused on developing trust and building relations with Traveller and Roma communities.

Over the lifetime of SICAP 2018-2023, 2,866 Travellers and 719 people from Roma communities were receiving supports. While the overall proportion of Travellers supported per year is between 2-3%, the numbers supported have increased since the identification of the national priority groups, rising from 713 people in 2021 to 869 in 2022. Similarly, the numbers of Roma engaged with SICAP have more than doubled since 2018, rising from 140 people in 2018 to 308 in 2023. Additionally, approximately 23 Social Enterprises referred to Traveller supports in their objectives, training, employment or volunteering opportunities, and 3 Social Enterprises referred to Roma under the same categories.



Under SICAP 2024-2028, Travellers and Roma are again two distinct named Target Groups. In addition to the standard target groups, Local Community Development Committees may also name SICAP target groups in their area to be provided with more intensive SICAP supports.

DRCD engaged closely in the development of NTRIS II, particularly in the context of increasing supports for Traveller and Roma Target groups under SICAP. Action 38 of the NTRIS II Action Plan sets a target to increase the proportion of Travellers and Roma on the SICAP caseload to 5% and 2%, respectively (from the 2021 baseline of 3% and 1%, respectively). SICAP work with these communities is challenging due to the complex needs faced by these communities and the intensity of supports required for their engagement. The above targets are ambitious in that context, and DRCD is committed to supporting the Programme Implementers working with the Traveller and Roma communities in their areas to achieve these over the timeframes outlined in the Strategy.

In regard to the Community Services Programme and Social Enterprise, funding of €150,000 was made available through the Dormant Accounts Fund in 2024 which was earmarked to provide support to eight organisations proposing to establish social enterprises primarily to employ people from the Traveller community within the circular economy, a sector often associated with the Irish Traveller community. The funding under this measure is being used to provide targeted support and to build capacity in Traveller-led social enterprises so that they are in a stronger position to apply for future funding calls under the mainstream Community Services Programme, as well as exploring other forms of income from trade, grants and other funding. A Traveller Liaison Officer was appointed to lead on this initiative in September 2024. This role will ensure targeted supports are sourced and implemented appropriately for the Traveller organisations involved.

Local Enterprise Offices (LEOs) provide a range of additional supports for those wishing to start or grow their own business, including advice, guidance, financial assistance, and other supports.

The LEO Policy Statement, published in May of 2024, sets out to promote inclusion and accessibility for all in entrepreneurship, particularly those in under-represented groups. Part of the work involved in this action includes adapting content and method of delivery to suit the needs of different social groups in consultation with representative bodies, and a specific focus on underrepresented groups in all national campaigns and award programmes.

LEOs are actively engaged in ensuring consistent and quality service delivery for any person who is availing of LEO services. LEO staff have received training sessions delivered by Employers for Change, which is a programme of the Open Doors Initiative. This included a session on challenging bias and understanding reasonable accommodations and on cultural awareness, which covered topics such as barriers faced by people from different cultures and ethnicities in Ireland, as well as how to ensure equal opportunities for this group and help integrate them in the workplace.

**Paragraph 162. The Advisory Committee strongly encourages the authorities to consider child benefit as a universal payment not subject to the Habitual Residence Condition to ensure that all Roma children residing in the state are eligible for child benefit allocations regardless of the legal or administrative status of their parents.**

The Habitual Residence Condition (HRC) is designed to safeguard the social welfare system by ensuring that access to means-tested social assistance and to Child Benefit is restricted to those people who have

established a connection to Ireland. HRC is provided for in Irish social welfare legislation and is in accordance with EU legislation and with European Courts of Justice jurisprudence.

The legislation providing for the HRC is contained in Section 246 of the Social Welfare Consolidation Act 2005 (as amended). Deciding Officers and Designated Persons must also have regard to Statutory Instrument 548/2015 European Communities (Free Movement of Persons) Regulations 2015, which deals with the right of residence for EU/EEA citizens and their families.

The Supreme Court of Ireland has determined that in applications for Child Benefit the claimant (i.e. the parent) must be habitually resident in the State for Child Benefit to be paid in respect of a child. In addition, the Supreme Court expressed satisfaction that the State is entitled to regulate the manner in which it provides for those in the State whose status has not yet been determined, and to have appropriate measures in place to decide the basis upon which social welfare benefits are payable to those within the State.

The HRC does not discriminate on grounds of ethnicity or nationality and is applied to all claimants irrespective of ethnicity or nationality, including Irish citizens. It also makes no reference to the ethnic status, nor the nationality of the claimant's family, and there is no minimum period of presence in the state required in order to satisfy this condition.

There are no plans to make amendments to HRC at this time. However, the HRC does not apply to Exceptional Needs Payments or Urgent Needs Payments (both administered under the Supplementary Welfare Allowance Scheme) as, by their nature, these payments may be required to meet an immediate and once-off need. Under this scheme, any person present in the State, including asylum seekers, refugees, migrants, Travellers or Roma, can apply to access a payment arising from an exceptional or urgent need. There is no automatic entitlement to a payment as each application is determined by the particular circumstances of the case.

*Article 15 of the Framework Convention: Effective participation in socio-economic life: access to healthcare*

**Paragraph 171. The Advisory Committee urges the authorities to fully implement the National Traveller Health Action Plan, with an allocation of a dedicated recurring budget. The authorities should also develop and implement the National Traveller Mental Health Action Plan, including for children and youth, with clear targets, timelines, and adequate resources. They should also take measures aimed at preventing suicides and mitigating the mental health crisis in general among persons belonging to the Traveller community.**

The National Traveller Health Implementation Group was established in 2023 to support the implementation of the National Traveller Health Action Plan, ensuring that the social determinants of health are addressed through a comprehensive public health response that provides tailored and affirmative measures to promote health and reduce inequalities. This group is chaired by senior leadership in the Health Service Executive (HSE) and comprises membership from across the HSE, the Traveller community, the Department of Health and other relevant bodies. The group has developed an implementation plan across all local areas and in partnership with Traveller Health Units and the Primary Health Care for Travellers Projects (PHCTPs). It also involves close working with other public bodies providing services that impact on Traveller health and wellbeing, including community and local development, anti-discrimination measures, accommodation and homelessness, employment and income support, and education.

In Budget 2022, €1.3 million in funding was provided on a recurrent basis specifically for the implementation of this plan. This funding was allocated to establish two new PHCTPs and to expand and improve other Primary Healthcare Projects across the country. The funding was also used for training and other activities to improve the delivery of healthcare services for Travellers. Further funding was allocated in 2025 to provide and improve healthcare services specifically for Traveller children.

In addition, €2 million was provided by the HSE in 2022, in partnership with the Genio Trust, to enable meaningful consultations with Travellers on the regional implementation of the National Plan, to expand Traveller health supports and to integrate further the Traveller health infrastructure with the wider Health systems. The focus of this funding was on instigating the rapid implementation of the National Traveller Health Action Plan in line with the priorities of Travellers locally.

A mid-term review of the National Traveller Health Action Plan and a review of the Primary Health Care for Travellers Projects is to take place in 2025 and will provide evidence to improve and expand effective health services for Travellers.

An implementation plan for the mental health actions in the National Traveller Health Action Plan has been developed, with a HSE/Traveller organisation/Department of Health group established to coordinate implementation. Significant core funding has been provided as part of Budget 2025 to support this activity, including funding to: expand the National Traveller Counselling Service; enhance the National Clinical Programme for Self-Harm and Suicide Related Ideation, with culturally sensitive supports for Travellers; and to enhance the Suicide Bereavement Liaison Service with culturally appropriate supports for Travellers. These activities are also supported through ongoing funding to Traveller NGOs and through the network of HSE Traveller Mental Health Coordinators.

**Paragraph 172. The Advisory Committee calls on the authorities to take concrete and gender sensitive measures to improve Roma access to basic healthcare, including measures regarding the issuance of medical cards and improved access to interpretation services. The authorities should ensure that the Roma community is mentioned in all health and mental health action plans.**

It is recognised that the Roma community have unique health needs that need to be addressed, including health literacy, translation, medical card supports, and pregnancy supports. Ireland has committed in the National Traveller and Roma Inclusion Strategy II 2024 – 2028 (NTRIS II) to develop a Roma Health Action Plan that incorporates mental health actions to address these Roma specific healthcare needs.

As part of this work, the Department of Health will map and assess the current provision of Roma health advocacy projects and areas with high concentration of Roma families and incorporate the findings with the evaluation reports of relevant Roma health pilot advocacy projects. This will provide an understanding of need within the community, and it will provide an understanding of current service provision. Consultations on the proposed Roma Health Action Plan will also be completed with members of the community, service providers and other relevant stakeholders.

Additionally, an implementation plan for the mental health actions in the NTRIS II has been developed. Once off funding has been provided as part of Budget 2025 to fund research into the mental health support needs of Roma in Ireland. A new implementation plan for Sharing the Vision, the national mental health policy, is currently being developed. The needs of the Roma community will also be addressed through the implementation of Recommendation 61 under that policy, which aims to ensure that mental health services

are inclusive and take account of the cultural and diverse needs of the whole population, including people from minority backgrounds.

*Article 15 of the Framework Convention: Effective participation in socio-economic life: access to accommodation and housing*

**Paragraph 179. The Advisory Committee calls on the authorities to improve the accommodation and housing situation of persons belonging to the Traveller and Roma communities, including through securing investment for enabling their access to all public services. The authorities should pay particular attention to ensuring safe living conditions also keeping in mind the legal conditions fixed for the security of tenure. The authorities should introduce clear actions and associated implementation plan and resources for both Travellers and Roma in the new National Traveller and Roma Inclusion Strategy.**

As detailed in the comment on the recommendation under Article 5, Paragraph 93, progress is being made by the Irish authorities in the delivery of Traveller accommodation and improving the accommodation outcomes for members of the Traveller community. There has been capital expenditure of over €100 million in the period 2020 - 2024 on Traveller-specific accommodation, which is additional to the range of standard social housing schemes that Travellers also benefit from. The Department of Housing, Local Government, and Heritage is committed to supporting the National Traveller and Roma Inclusion Strategy II 2024-2028, including the associated accommodation actions in the Action Plan.

**Paragraph 180. The Advisory Committee encourages the authorities to implement all recommendations issued by the Independent Expert Group on Traveller Accommodation with a time lined implementation plan, tangible targets, clear indicators, corresponding accountability measures and adequate budget.**

Following publication of the Expert Review, the Minister for Housing, Local Government and Heritage established a Programme Board in 2021 to oversee the implementation of the recommendations contained in the Traveller Accommodation Expert Review report. The Programme Board oversees the sequencing of projects to be advanced and, in collaboration with all stakeholders, is advancing work on 28 of the 32 recommendations of the Expert Group. The Programme Board produces a report periodically setting out the status of work on the recommendations. At present, this work includes, but is not limited to, consideration of current governance arrangements under the Housing (Traveller Accommodation) Act, 1998 and related recommendations such as a National Traveller Accommodation Authority. A research project is also underway to understand best practice as regards the design of Traveller-specific accommodation: this includes halting sites and group housing schemes. This will inform future guidance on the delivery of Traveller-specific accommodation.

Additionally, a joint project with the Northern Ireland Housing Executive to explore collaboratively the feasibility of an all-island approach to the provision of a network of transient sites is in development, and a subgroup has been established to develop a protocol on an eviction procedure to issue to local authorities with input from Traveller group representatives and local authorities.

Finally, a Traveller Representative from the National Traveller Accommodation Consultative Committee (NTACC) has been nominated to the National Homeless Action Committee to assist with addressing the issue of Traveller homelessness. Work continues across each of these recommendations at present.