



FIFTH OPINION ON IRELAND

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

Adopted on 16 October 2024

COUNCIL OF EUROPE



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SUMMARY OF THE FINDINGS

1. Irish society continues to demonstrate overall respect for diversity and sensitivity to intersectionality, although several instances of intolerance during the reporting period have captured the Advisory Committee's attention. This general positive atmosphere in Ireland clashed with attitudes of the majority population towards persons belonging to the Traveller and Roma communities who still suffer from various forms of discrimination, prejudice and institutional racism in public institutions and private companies. The adoption in 2024 of strategies and action plans for Travellers and Roma is nevertheless welcomed.

Personal scope of application

2. Ireland has not changed its personal scope of application and does not recognise the concept of a "national minority" within the meaning of the Framework Convention. As part of its regular reporting on the implementation of the Framework Convention, the Irish authorities nevertheless apply the Framework Convention to persons belonging to the Traveller community which is welcome. They also provide information on the situation of the Roma ethnic community who could for the first time self-identify as "Roma" during the 2022 census. Considering that the recognition by the *Dáil* of Travellers as an "ethnic group of the Irish nation with a distinct heritage, culture and identity" in 2017 does not entail any specific legal effect in practice, the Advisory Committee emphasises the importance of formally clarifying without further delays the extent to which the Framework Convention applies to persons belonging to the Traveller community.

Legal framework against discrimination

3. An ongoing review of the Equality Acts and the impending adoption of a National Equality Data Strategy by the government are commendable steps towards the promotion of equality but delays in their adoption are a matter of concern. The use of standardised "ethnic identifiers" for persons belonging to the Traveller and Roma communities needs to be extended to all state departments and public administration. Section 19 of the 2003 Intoxicating Liquor Act has not been repealed, and Traveller potential victims of discrimination in "places of entertainment" still do not have the adequate procedural guarantees in terms of access to justice. These cases are adjudicated by district courts rather than by the more accessible Workplace Relations Commission. With a view to addressing the existing barriers to legal aid, the number of dedicated Traveller legal service solicitors within the Legal Aid Board needs to be expanded.

National Traveller and Roma Inclusion Strategy and intersectional discrimination

4. The Irish authorities make important efforts to adopt national strategies and action plans, such as the new National Traveller and Roma Inclusion Strategy 2024-2028 (NTRIS II), as well as the first Action Plan for 2024-2026 and indicative actions for 2027-2028. The disappointment stemming from the lack of action on the previous NTRIS, despite consultation with Traveller and Roma civil society, underscores the importance of transparency and accountability in the development process. The Travellers and Roma rightly demanded the right to review the draft successor strategy before its adoption to ascertain the inclusion of a stronger outcomes-focused approach and a transparent reporting and implementation structure, with achievable actions, clear performance indicators and a robust monitoring mechanism. Strengthening these elements was deemed crucial to ensuring that the strategy translates into tangible improvements in the lives of persons belonging to Traveller and Roma communities. Traveller and Roma women and girls should also be given voice in the development of the National Strategy for Women and Girls. A robust implementation plan for 2024 is now envisaged for the Third National Strategy on Domestic, Sexual and Gender-based Violence, which was published on 1 April 2024.

Promotion of Roma and Traveller cultures and Traveller way of life

5. The authorities have supported project-based cultural activities, such as the Traveller Pride Week and the International Roma day. Culturally appropriate accommodation for persons belonging to the Traveller community remains a major issue, resulting in further poverty, marginalisation and social exclusion of this community and persons who affiliate with it. Its planning is relatively poor and is impacted by local opposition and consequent politicisation of the process. The authorities claim that funds available for culturally appropriate accommodation were spent by local authorities in the years 2020-2023; however, there has been a significant reduction in the Traveller accommodation budget over recent years, and no sanctions are in place or envisaged for failing to meet the obligation to provide for such accommodation. Over the years, Traveller organisations have advocated for a national Traveller accommodation authority to remove the issue of accommodation from the competences of local authorities and ensure a more coordinated and equitable approach nationwide. Regrettably, these issues remain unaddressed. Many Travellers who are still waiting for culturally appropriate accommodation live in social housing

type accommodation. A new Traveller identifier question was introduced in the Social Housing Support application form in March 2022. This is expected to allow for more effective monitoring of progress towards meeting Traveller housing needs. The trespass legislation has not been repealed: there are still insufficient transient sites, and the existing ones are used for temporary and emergency accommodation.

Protection from hostility, hate crime and hate speech

6. The National Action Plan Against Racism, adopted in 2023, aims to protect all individuals and communities from racism, but it has to be clearly tailored to combat *inter alia* the specific form of anti-Traveller and anti-Roma racism, as well as be coupled with dedicated funding. Racist incidents against Travellers and Roma are significantly under-reported. There is a pervasive lack of trust in the law enforcement authorities. Furthermore, the prison system in Ireland shows a disproportionate representation of persons belonging to the Traveller community, including women and youth, partly due to their conviction for minor crimes. The introduction of the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill marks a critical step forward in addressing racially motivated violence against individuals affiliating with Roma and Traveller communities. Criminalisation of intentional or reckless behaviour inciting violence or hatred based on protected characteristics is a long-awaited and crucial safeguard for marginalised communities.

Education

7. Significant efforts have been made to improve access to education of Traveller and Roma children, particularly in the primary and the post-primary levels. Bullying, illiteracy and poor living conditions remain, however, long-standing challenges which need to be addressed. Access to higher education for Traveller and Roma students is also an issue entailing negative consequences for their participation in the labour market and their political representation. Specific support, such as Ireland's national awarding authority for further and higher education grant (SUSI) scheme for all eligible Traveller and Roma students, is awarded subject to eligibility criteria for further and higher education. In addition, since 2022, a new fund known as the "Programme for Access to Higher Education Strand 5" has been put in place and is aimed at increasing the level of participation by Traveller and Roma students in Higher Education. The Department of Education already publishes annual education indicators reports that include ethnicity data and annual retention reports. Concerns exist around a disproportionate use and impact of reduced timetables for Traveller pupils and students. The adoption of a Traveller and Roma Education

Strategy (TRES) 2024-2030, alongside the initial plan for implementation and action for 2024-2026, took place, after some delays, on 16 July 2024. It is expected to receive adequate resources to address the educational disadvantage experienced by Travellers and Roma at all educational levels. The Strategy, developed in collaboration with the Traveller and Roma communities, aims to improve education outcomes and address barriers faced by persons affiliating with these communities. The 2023 Traveller culture and history research report has been welcome and information about the cultures, traditions, histories, and languages of the Traveller community, and their integral and positive role in Ireland's society, should be highlighted more fully in school curricula, educational materials, as well as in accompanying teacher and school professional training. More efforts are expected from the authorities regarding the provision of intercultural education. The inclusion of the Roma genocide remembrance in the school curricula is equally important.

Participation in public life

8. One of the commendable measures in the monitoring period was the appointment of a Traveller woman by the Prime Minister (the *Taoiseach*) to the Upper House (the *Seanad*) of the national Parliament (the *Oireachtas*) who has chaired important meetings. This appointment is a step in the right direction. However, it does not address the broader issue of the alarmingly low participation and exclusion of persons belonging to the Traveller community in Irish public life. The adoption of a general practice of appointing a Traveller representative to the *Seanad* would be a welcome step towards guaranteeing representation of the community in the long term. Generally, more efforts are needed, apart from training, to ensure Travellers' inclusion in different spheres of public life.

Participation in socio-economic life: access to employment, healthcare, accommodation and housing

9. A number of studies completed during the monitoring period provide for a comprehensive picture of the nature and extent of the social and economic difficulties encountered by persons belonging to the Traveller and Roma communities highlighting the necessity for the authorities to address poor accommodation conditions, a disproportionate unemployment rate and serious health issues, in particular the high number of suicides and mental health problems among Travellers. The National Traveller Health Action Plan is a positive, timely and welcomed policy, but Traveller civil society also expects the adoption of a National Traveller Mental Health Action Plan to address suicides and the mental health crisis the Traveller

community have been experiencing. Some persons belonging to the Roma community face barriers in obtaining medical cards which prevent them from effectively accessing free healthcare services. Child benefit should not be subject to the Habitual Residence Condition to ensure that all Roma children are eligible for this regardless of the legal or administrative status of their parents. It is worthwhile for the public sector to support the Traveller economy, including the entrepreneurship and Traveller-led social enterprises. Persons belonging to the Roma community often cannot provide a rental certificate or other proof of housing to access social benefits. The Traveller and Roma communities are significantly over-represented in the population experiencing homelessness and many halting sites for Travellers are situated in environmentally hazardous and unhealthy areas. More efforts are therefore expected from the authorities to improve the social and economic conditions of persons belonging to Traveller and Roma communities.

RECOMMENDATIONS

10. The Advisory Committee considers that the present concluding remarks and recommendations could serve as the basis for the resolution to be adopted by the Committee of Ministers with respect to the implementation of the Framework Convention by Ireland.

11. The authorities are invited to take account of the detailed observations and recommendations contained in the present Opinion of the Advisory Committee. In particular, they should take the following measures to improve further the implementation of the Framework Convention:

Recommendations for immediate action

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

Further recommendations¹

17. 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.

18. 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.

19. 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.

20. 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.

¹ The recommendations below are listed in the order of the corresponding articles of the Framework Convention.

21. 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 co-operation and partnership with Traveller and Roma organisations.

22. 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.

23. 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.

24. 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.

25. 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.

Follow-up to these recommendations

26. The Advisory Committee encourages the authorities to organise a follow-up event after the publication of this fifth-cycle Opinion. It considers that a follow-up dialogue to review the observations and recommendations made in this Opinion would be beneficial. Furthermore, the Advisory Committee stands ready to support the authorities in identifying the most efficient ways of implementing the recommendations contained in the present Opinion.

MONITORING PROCEDURE

Follow-up activities related to the recommendations of the Fourth Opinion of the Advisory Committee

27. A Joint Committee of the *Oireachtas* (Irish Parliament) on Key Issues Affecting the Traveller Community (“the Joint Committee”) was established in September 2020 to consider policy directions and recommendations in respect of health, education, employment and accommodation affecting persons belonging to the Traveller community. The Joint Committee published its final report² in November 2021. In December 2021, a follow-up meeting to the Fourth Opinion of the Advisory Committee on Ireland was held online.³ The Advisory Committee welcomes this opportunity to exchange on its recommendations and to identify ways forward. In addition, in the context of the Irish Presidency of the Committee of Ministers of the Council of Europe, Ireland organised a Conference in Galway entitled “Irish Travellers/Mincéirs and the state, 1922-2022: the Struggle for Equality” in September 2022. The Advisory Committee welcomes the attention given by the Irish authorities, including at international level, to issues concerning the Traveller community and invites the authorities to widely disseminate the findings and recommendations of the Advisory Committee, by using a partnership approach with Traveller and Roma organisations at national and local levels to increase their awareness of this monitoring mechanism.

Preparation of the state report for the fifth cycle

28. The state report, due on 1 September 2020, was received on 12 July 2023. Organisations representing and promoting the rights of persons affiliating with the Traveller and Roma communities were consulted and the government introduced their contribution in Annexes of the state report. Numerous gender-related aspects of minority rights are addressed in the state report.⁴

Country visit and adoption of the Fifth Opinion

29. This fifth-cycle Opinion on the implementation of the Framework Convention for the Protection of National Minorities (hereinafter “the Framework Convention”) by Ireland was adopted in accordance with Article 26(1) of the Framework Convention and Rule 25 of Resolution (2019)49 of the Committee of Ministers. The findings are based on information contained in the fifth state report, other written sources, as well as information obtained by the Advisory Committee from governmental and non-governmental sources during its visit to Dublin (including Finglas and Tallaght suburbs), Longford and Galway (including Carrowbrowne temporary and transient sites), from 18 to 22 September 2023. The Advisory Committee expresses its gratitude to the authorities for their excellent co-operation before, during and after the visit, and to the other interlocutors it met during the visit for their valuable contributions. The draft opinion, as approved by the Advisory Committee on 29 May 2024, was transmitted to the Irish authorities on 31 May 2024 for observations, according to Rule 37 of Resolution (2019)49. The Advisory Committee welcomes the observations received from the Irish authorities on 4 September 2024.

* * *

30. A number of articles of the Framework Convention are not covered in the present opinion. Based on the information currently at its disposal, the Advisory Committee considers that the implementation of these articles does not give rise to any specific observations. This statement is not to be understood as signalling that adequate measures have now been taken and that efforts in this respect may be diminished or even halted. Rather, the Advisory Committee considers that the obligations of the Framework Convention require a sustained effort by the authorities. Furthermore, a certain state of affairs which may be considered acceptable at this stage may not necessarily be so in further cycles of monitoring. Finally, it may be that issues which appear at this stage to be of relatively minor concern prove over time to have been underestimated.

² See [Final Report of the Joint Committee on Key Issues Affecting the Traveller Community](#), November 2021.

³ See [meeting report](#) of the Follow-up meeting on the Fourth Opinion on Ireland, 7 December 2021.

⁴ See gender related references in the [fifth state report](#) submitted by Ireland on paras. 35, 45, 77, 108, 112, 114-119, 121-122, 158, 163 and 165-173.

ARTICLE-BY-ARTICLE FINDINGS

Personal scope of application (Article 3)

31. Regrettably, there have still been no changes in the overall approach of the Irish authorities towards the personal scope of application of the Framework Convention. Ireland does not recognise the concept of a “national minority” within the meaning of the Framework Convention.⁵ The authorities officially state that the Framework Convention applies to Irish Travellers (“the Travellers”) and Irish governments have recognised the special position of Travellers in a range of legislative, administrative and institutional provisions designed to protect their rights and improve their situation.⁶ However, persons belonging to the Traveller community reported that since there is no concept of a “national minority”, it is not clear which provisions of the Framework Convention are applicable to them. While the recognition in 2017 by the *Dáil* (lower chamber of the *Oireachtas*, the Parliament) of Travellers as a “distinct ethnic group within the Irish nation with a distinct heritage, culture and identity”⁷ had a strong symbolic value, it does not entail any legal effect, as pointed out *inter alia* by representatives of the Traveller community. This recognition neither creates specific rights nor has any implications on public expenditure;⁸ therefore the rights that can be assessed and enjoyed by persons belonging to the Traveller community remain unclear.

32. The Advisory Committee is of the view that the status of a “distinct ethnic group within the Irish nation” according to the 2017 formal recognition by the *Dáil* is substantively aligned with the underlying meaning of the term “national minority” according to the Framework Convention. The Advisory Committee is also aware of the context in which Ireland has ratified the Framework Convention as part of the commitment given by the Irish Government under the 1998 Good Friday (Belfast) Agreement. It reiterates that the Contracting Parties have a margin of appreciation in determining the personal scope of the Framework Convention but that, in doing so, no arbitrary or unjustified distinctions shall be made. Given its task to monitor the effective implementation of rights contained in the Framework Convention, the Advisory Committee has primarily been concerned with access to rights and only

secondarily with questions surrounding status, except in cases where the status has prevented persons belonging to national minorities from enjoying access to rights. The application of the Framework Convention to a specific group therefore does not require the latter’s formal recognition as a “national minority”, nor a specific legal status for such a group of persons, but it should lead to concrete measures to ensure access to the rights enshrined in the Framework Convention.⁹

33. As part of its regular reporting on the implementation of the Framework Convention, Ireland provides information on the situation of persons belonging to the Traveller community, but Ireland has still not explicitly committed to protect them under the Framework Convention. Following the Traveller community’s concerns, the Advisory Committee considers that problems occur when it comes to the practical access to minority rights since persons belonging to the Traveller community are not aware whether the provisions of the Framework Convention are fully or partly applicable to them. The Advisory Committee therefore emphasises that access to rights and their effective implementation are of paramount importance and must be the primary consideration for the authorities. Notwithstanding the fact that they are not defined as a “national minority” in the Irish legislation, the Advisory Committee considers that the Irish Government should move beyond this symbolic recognition and clarify to what extent persons belonging to the Traveller community are covered by the scope of application of the Framework Convention, then providing clarity about it within the Irish population, and notably within the Traveller community.

34. The authorities have not explicitly stated whether and to what extent the Roma community in Ireland is protected under the Framework Convention, though the state report discusses the situation of both Travellers and Roma. However, considering the authorities’ statement that migrant groups do not come within the scope of the Framework Convention, and in light of the high share of recent migrants among the Roma community, the Advisory Committee considers it important to also clarify whether and how the Roma are protected under the Framework

⁵ The Equal Status Act 2020 (p. 7) defines the Traveller community as “the community of people who are commonly called Travellers and who are identified (both by themselves and others) as people with a shared history, culture, traditions including, historically, a nomadic way of life on the island of Ireland.”

⁶ See the [fifth state report](#), para. 9.

⁷ See [Statement by An Taoiseach Enda Kenny TD on the recognition of Travellers as an ethnic group](#), *Dáil Éireann*, 1 March 2017, last updated on 28 October 2018.

⁸ See the [written submission by the Irish Human Rights and Equality Commission](#) from 26 October 2023.

⁹ See [ACFC Thematic Commentary No. 4](#), The scope of application of the Framework Convention for the protection of national minorities, adopted on 27 May 2016, para. 37.

Convention, and how this may differ from Travellers.

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.

Data collection and population census (Article 3)

36. The recent census of the Central Statistics Office (CSO) took place in April 2022 and results were released in May 2023. It established that Ireland's population was 5 149 139. The number of usually resident Travellers increased by 6% compared to the previous 2016 census, amounting to 32 949 persons. For the first time, persons belonging to the Roma community living in Ireland could self-identify as such in the census questionnaire and 16 059 did so. There was also a possibility through a free text box to indicate other ethnic affiliations, including for persons with multiple affiliations. Social media campaigns, including leaflets and videos, made by, and for, Travellers and Roma, were also organised to ensure participation in census.

37. Whilst welcoming an increasing number of persons self-affiliating with the Traveller community in the recent population census, various interlocutors from Traveller organisations are of the view that there are still persons belonging to their community who do not self-identify as such for several reasons, including fear of repercussions and stigmatisation and difficulties encountered when filling in census forms due to poor literacy. Traveller organisations estimate the number of Travellers in Ireland to be closer to 50 000. Persons belonging to the Roma community, whilst welcoming the possibility to self-identify as "Roma", also consider that their numbers are higher than census results show. In exchanges with the Advisory Committee, the authorities acknowledged that there may be a reluctance amongst persons belonging to the Traveller and Roma communities to self-identify as such, which might be the reason explaining why the census numbers might be lower than their actual numbers.

38. The Advisory Committee reaffirms its view that reliable information about the ethnic composition of the population is an essential condition for implementing effective policies and measures to protect minority rights, for helping to preserve, assert and develop minority identities, as well as for addressing the needs and interests of persons belonging to national minorities,

including from a gender and age perspective. Population statistics should be collected regularly and should be complemented with information gathered through independent qualitative and quantitative research, particularly when results are contested. Results should be carefully analysed in consultation with minority representatives.

39. The Advisory Committee welcomes the efforts by the authorities, as well as by Traveller and Roma organisations, in facilitating the smooth running of the population census. The Advisory Committee considers that the comprehensive results of the census should be analysed with other sets of data and in close consultation with Traveller and Roma representatives who need to reflect diversity within these communities. The outcome of such a joint analysis, combined with other disaggregated data collection, should serve as the basis for policy making regarding access to minority rights.

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.

Legal and institutional framework against discrimination (Article 4)

41. Ireland's legal framework on anti-discrimination continues to be regulated by the Equality Acts – the Employment Equality Acts and the Equal Status Acts – which prohibit discrimination on the grounds of *inter alia* "race", gender, age, religion and "membership of the Traveller community". The anti-discrimination legislation prohibits both direct and indirect discrimination in the areas of employment and access to goods and services, including housing and housing assistance,¹⁰ health care and education. A review of the Equality Acts is currently being undertaken by the government. The Workplace Relations Commission (WRC) deals with complaints under the Equality Acts and includes as core services the inspection of employment rights compliance and the provision of mediation, conciliation, facilitation and advisory services. The District Court organised on a local basis in Ireland deals with civil actions where compensation claimed does not exceed €15 000 and also handles liquor licensing cases. The Irish Human Rights and Equality Commission (IHREC) is Ireland's national human rights institution, functioning at the same time as the body designated for the promotion of equal

¹⁰ The Equal Status Acts prohibit discrimination in the provision of accommodation services against people who are in receipt of rent supplement, housing assistance, or social welfare payments.

treatment irrespective of racial or ethnic origin (Equality Body). Its mandate covers also all the other discriminatory grounds set out under domestic anti-discrimination law. It provides general information on anti-discrimination law and, in a limited number of cases, legal assistance. The IHREC has the competence to conduct surveys, publish reports and make recommendations on discrimination issues. The remit of the Office of the Ombudsman (hereinafter “the Ombudsperson”) includes discrimination in access to many public services.¹¹

42. The Legal Aid Board is an independent, publicly funded body, which provides legal aid services to the population. The Free Legal Advice Centres (FLAC) are an independent voluntary organisation promoting equal access to rights. The Legal Aid Board works with the FLAC to support persons belonging to the Traveller community to access their rights. As part of this, a solicitor has been seconded to a dedicated centre which provides legal services to Travellers.

43. The 1995 Civil Legal Aid Act does not apply to eviction proceedings, which can occur as soon as 24 hours after relevant notice is served, meaning that persons belonging to the Traveller community often find themselves without legal representation in these hearings. The Social Welfare Appeals Office and the WRC are not prescribed under the 1995 Civil Legal Aid Act and thus the Legal Aid Board is unable to provide legal representation before those bodies. The Legal Aid Board is also not authorised to represent applicants in Social Welfare Appeals Office proceedings. Furthermore, the financial contribution which applicants must pay to access legal aid or advice is a barrier to access justice. The Civil Legal Aid Scheme is pending amendments by the government.

44. Various interlocutors of the Advisory Committee welcomed the government’s commitment to amend equality legislation, including its functioning and effectiveness in practice. However, whilst the public consultation on the Equality Acts review has been finalised,¹² there are delays in bringing forward legislative proposals and no concrete timelines are in place. They noted a general lack of legal aid for lodging complaints concerning social welfare, housing and eviction. Interlocutors, including persons

belonging to the Traveller community, also welcomed the setting up of a dedicated Traveller Legal Service solicitor in the Legal Aid Board and requested this measure to be strengthened and expanded.

45. Traveller community representatives stated that they encounter discriminatory attitudes when applying for different employment announcements. They mentioned that most of *curriculum vitae* sent by persons belonging to the Traveller community are not read; once requested for attending an interview, the accent is used as a marker of their ethnicity, alongside their family name, address, inter-actions, manners and appearance. Except maybe for accommodation purposes, persons belonging to the Traveller community often hide their identity in Ireland. The Ombudsman for Children’s Office (OCO) published in May 2021 a report that was highly critical of the standards of accommodation provided for persons belonging to the Traveller community, describing some conditions for children at a local authority-run halting site as “deplorable”.¹³ In December 2022, a ‘No End in Site’ update was published, in which the OCO recognised the efforts made by the local authority to improve conditions on halting sites after the local authority responsible prioritised implementation of OCO recommendations. However, there is still a long road ahead to rehousing families and making the site fit for purpose. There are still families who are not happy with what has been done so far, and who feel things are not happening fast enough. Continuous open communication is needed to drive further change.¹⁴

46. Interlocutors of the Advisory Committee further criticised the exclusion of administrative tribunals from the scope of competence of the Legal Aid Board given the disproportionate effect on marginalised groups, such as Travellers and Roma. Legal aid is for instance not available for claims made in the WRC despite the fact that this is a key avenue through which persons belonging to the Traveller and Roma communities protect their rights under equality legislation. While legal representation is not required at the WRC, trade unions and advocacy groups can, and do, assist persons in making claims. However, the majority of Travellers are not members of a trade union and the nature of the cases regarding discrimination mainly relate to accessing goods and services. In addition, due to the high levels of

¹¹ European network of legal experts in gender equality and non-discrimination, [Country report non-discrimination Ireland 2023](#), p. 90.

¹² Department of Children, Equality, Disability, Integration and Youth, [Minister O’Gorman publishes report on the submissions to the public consultation on the Review of the Equality Acts](#), 2023.

¹³ Ombudsman for Children’s Office, [No End in Site](#), 24 May 2021. The OCO launched an investigation following a 2018 complaint from a Traveller advocacy group about the conditions in the unnamed site, where 66 children and their families are living. The site was found to be rat-infested with inadequate sanitation and poor maintenance, to the point where children living there were suffering skin conditions and respiratory problems.

¹⁴ Ombudsman for Children’s Office, [No End in Site update](#), 7 December 2022.

educational disadvantage they face, Travellers are very often not in position to represent themselves or have a Traveller advocate represent them. This leaves them at a serious disadvantage when deciding to take a case against unfair treatment based on their identity.

47. The Advisory Committee emphasises that adequate legal mechanisms for the protection against discrimination are essential to provide persons belonging to national minorities with the right of effective equality before the law and of equal protection of the law as guaranteed by Article 4 of the Framework Convention. The Advisory Committee underlines the particular importance of awareness-raising among persons belonging to minorities in general, and those communities most exposed to discrimination, on the legal remedies available to them in case of alleged discrimination.

48. In this light, the Advisory Committee considers that the small number of discrimination complaints lodged with the Irish Human Rights and Equality Commission, the OCO and the Ombudsperson could reflect a lack of awareness and possibly trust of these institutions among persons belonging to the Travellers and Roma communities. The Advisory Committee considers that intensified engagement with those individuals is needed to intensify the outreach of these institutions. The Advisory Committee is of the view that an accessible, effective, sustainable and reliable public legal assistance body should be in place, which will enable persons belonging to the Traveller and Roma communities to effectively exercise their right of access to justice. In this respect, the Action Plan for 2024-2026 of the National Traveller and Roma Inclusion Strategy II 2024-2028 (hereinafter “the NTRIS II 2024-2028”, see Article 4 below) envisages that an information campaign and a review of the adequacy of existing support for the provision of legal advice to Travellers and Roma be implemented.¹⁵

49. Another issue which has again been brought to the attention of the Advisory Committee concerns Section 19 of the 2003 Intoxicating Liquor Act (ILA), which relates to discrimination in “places of entertainment”, referred to by the law as “licensed premises” (i.e. bars, public houses,

hotels or clubs, where alcohol is offered for sale).¹⁶ Persons belonging to the Traveller community are 22 times more likely to experience discrimination in shops, pubs and restaurants than the rest of the Irish population.¹⁷ One pressing issue is the difficulty in booking hotels for family occasions, which adds unnecessary stress particularly during significant life events such as weddings.¹⁸ Addressing this challenge would not only promote equality and fight discrimination but also improve the quality of life for persons belonging to the Traveller community. Interlocutors from the Traveller community have continuously advocated for those cases of discrimination in “places of entertainment” to fall under the competence of the WRC, arguing that district courts were not efficient enough.¹⁹

50. The Advisory Committee, reiterating its previous findings,²⁰ deeply regrets that the legislative framework related to “places of entertainment” remains unchanged. The Advisory Committee considers that public houses should not constitute a space where discrimination is tolerated. Awareness raising measures on the part of the authorities, in particular on anti-Traveller racism, are necessary and need to target both the general public and owners and staff of “places of entertainment”.

51. The Advisory Committee is equally concerned that the accent of persons belonging to the Traveller community could play an active role in the denial of their access to public houses. In this connection, it reminds the authorities that accents are an integral part of an individual's identity. The Advisory Committee is of the view that the authorities should consider the possibility for adding the general prohibition of discrimination based on accent as a possible ground for discrimination under the Equality Acts. Finally, the Advisory Committee is concerned about persisting level of discrimination experienced by persons belonging to the Traveller community, in numerous aspects of their daily life, including when applying for employment. Awareness raising is therefore required at both national and local levels.

52. The Advisory Committee reiterates its call on the authorities to undertake all necessary measures, in close co-operation with relevant

¹⁵ Actions 7 and 8 of “Theme 1: Combatting Racism and Discrimination” of the [Action Plan for 2024-2026](#) of the [National Traveller and Roma Inclusion Strategy 2024-2028 \(NTRIS II\)](#), p. 11, 31 July 2024.

¹⁶ IHREC, [Report of a review of section 19 of the Intoxicating Liquor Act 2003 carried out pursuant to section 30 Of the Irish Human Rights and Equality Commission Act 2014](#), 2022.

¹⁷ BBC article, [Irish Travellers 'mental health crisis' driven by discrimination and deprivation](#), 18 April 2022.

¹⁸ Irish Legal News, [A hotel has been ordered to pay €11 000 to a family who suffered unlawful anti-Traveller discrimination when they were refused access for confirmation celebrations](#), 9 November 2023.

¹⁹ IHREC, [Submission on the Review of the Equality Acts](#), July 2023. According to data provided by the Courts Service, in 2019, 43 of 45 applications were lodged by persons belonging to the Traveller community and 36 of the total applications were withdrawn, struck or adjourned. There were nine orders made for compensation, and no orders made for closure of the premises.

²⁰ See the [Fourth Opinion of the Advisory Committee](#), para. 22.

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.

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

Equality data and “ethnic identifiers” (Article 4)

54. A number of departments and state agencies are in charge of collecting data disaggregated by ethnicity and gender, in line with international data protection standards. Effective since March 2022, ethnic affiliation (hereinafter an “ethnic identifier”) is now included in the social housing support application form and allows for more evidence-based planning for Traveller-specific accommodation. Applicants who choose to identify as Travellers are thereby able to record their specific accommodation requirements whether these be Traveller-specific accommodation, mainstream social housing or any other social housing option. In 2022, the National Equality Data Strategy²¹ was being developed by the Central Statistics Office and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY), with the consultation of representatives of Traveller organisations, with a view to putting in place a strategic approach to improving the collection, use and dissemination of equality data. It will further promote and support the use of an “ethnic identifier” which would enable persons belonging to Traveller and Roma communities access to, and participate in, public services. This “ethnic identifier” would also allow the authorities to track this access and participation more accurately. This strategy would provide a general approach for identifying current gaps in equality data and

guidance on how to fill those gaps, as well as develop standard practices in classification. However, while it was supposed to be in place in 2023, this strategy has not yet been adopted.

55. The 2020 Equality Data Audit²² is an initiative of the Central Statistics Office to bring awareness of and highlight gaps in the available data related to equality. The Equality Data Audit improved the collection of data disaggregated by equality dimensions, including the potential for using unique identifiers to match data with the necessary safeguards and to carry out cross-analysis of data. In some audit cases, “Irish Traveller” was included in a question on ethnicity. In relation to data collection on school completion rates, the Department of Education publishes annual reports on education indicators that include ethnicity data.²³

56. Despite this progress, several public agencies still do not collect data disaggregated by ethnic affiliation, and those who do, could improve the usage of such data.²⁴ Although a Traveller question was introduced in 2022 for social housing assessments, there are shortcomings in data collection relating to Traveller accommodation. A significant number of persons belonging to the Traveller community are not considered to experience homelessness for the purposes of data collection but are nevertheless living in unsuitable overcrowded accommodation or on unauthorised halting sites without basic amenities.²⁵ Furthermore, the number of persons living in unsuitable overcrowded accommodation or on unauthorised halting sites is not included in the monthly reports released by the Department of Housing, Local Government and Heritage on the number of persons living in emergency accommodation at each point in time. However, these numbers are included in the summary of social housing needs assessments, and so their current accommodation would form part of that reporting.²⁶ The OCO and the Ombudsperson also have little information about cases

²¹ Department of Children, Equality, Disability, Integration and Youth, [Minister O’Gorman announces the development of a National Equality Data Strategy](#), 21 March 2022. See also the [fifth state report](#), p. 31.

²² See the [Equality Data Audit 2020](#).

²³ Department of Education, [annual education indicator reports](#) that include ethnicity data and [annual retention reports](#). Ethnicity data is provided only with explicit written parental or guardian consent.

²⁴ Ethnic categories are not always standardised; ethnic identity is often ascribed to Travellers and Roma by using proxies such as name or looks; and the data is not disaggregated, analysed or provided to stakeholders within an appropriate timeframe and/or used to inform policy/service planning.

²⁵ IHREC, [Comments on Ireland’s 20th National Report on the Evaluation of the European Social Charter](#), 2023, pp. 8-9.

²⁶ The Housing Agency, [Summary of Social Housing Assessments 2023 – Key Findings](#), p. 27. In 2023, there were 512 households who identified as Travellers. This document also includes information on the preferred housing option for households that identified as Traveller in 2023.

concerning Travellers,²⁷ as they usually do not collect data on ethnicity, unless specified by applicants.²⁸

57. The Advisory Committee emphasises the importance of basing “equality promotion policy instruments or special measures on comprehensive data [...], also taking into account the various manifestations of multiple discrimination that may be experienced, including those arising from factors that are unrelated to the national minority background such as age, gender, sexual orientation and lifestyle markers”.²⁹ Collecting reliable, disaggregated data on the situation of persons belonging to national minorities is important for achieving full and effective equality, not least as it allows the authorities to assess whether steps taken to achieve this have been given effect. It is also important to raise awareness among national minorities of the necessity to collect such data for the elaboration of adequate policies to address their concerns.

58. The Advisory Committee welcomes the initiative to develop a National Equality Data Strategy and notes with interest some progress in providing and using “ethnic identifiers”. It notes, however, that a number of public bodies do not collect data by ethnicity. There is a need to introduce “ethnic identifiers” – as requested by interlocutors belonging to both Traveller and Roma communities – and effective linkages in data across the health, criminal justice and employment systems to measure the particular experiences of Travellers and Roma. In order to monitor progress in terms of Traveller accommodation, implementation of ethnic equality monitoring across housing/homelessness datasets is needed. The complaint mechanism of the Ombudsperson and the OCO would equally benefit from the inclusion of “ethnic identifiers” for persons belonging to the Traveller and Roma communities. The Advisory Committee therefore considers that collecting such statistical data in compliance with international standards on data protection is indispensable to design well-targeted and sustainable measures, meeting the needs and

interests of persons belonging to the Traveller and Roma communities. In this respect, the Advisory Committee expects that Action 78 of “Theme 9: Participation, Empowerment, Cooperation and Accountability” of the Action Plan for 2024-2026 of the NTRIS II will be fully implemented.³⁰

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.

National Traveller and Roma inclusion strategy (Article 4)

60. In October 2020, responsibility for co-ordination and oversight of the National Traveller and Roma Inclusion Strategy 2017-2021 (NTRIS) was transferred to the DCEDIY. Overall, despite some concrete efforts, various interlocutors of the Advisory Committee affirmed that the NTRIS 2017-2021 has been poorly implemented. The IHREC – as part of the NTRIS Steering Committee – criticised the state’s failure to fully implement this policy framework on multiple occasions. The findings of a recent evaluation of national equality strategies³¹ include inadequate implementation structures, a lack of Department ownership³² over assigned actions and the need for greater financial resources and administrative support. Interlocutors from the Traveller community also criticised the NTRIS for lack of actual implementation of agreed policies and recommendations.

61. The NTRIS II 2024-2028 and its Action Plan for 2024-2026 were launched and published on 31 July 2024 with, however, significant delays. They are currently 80 actions foreseen in the

²⁷ The coroner’s office would also need an “ethnic identifier” for death certificates.

²⁸ In its [Annual Report 2022](#), the Ombudsman found a local authority’s decision to deduct a Traveller couple’s previous 13 years housing list credit time on the grounds of a two-month delay with paperwork to be unreasonable and disproportionate. Following the Ombudsman’s inquiry, the local authority introduced a formal process for credit time reviews to prevent a similar situation from occurring in future.

²⁹ See [ACFC Thematic Commentary No. 4](#), para. 66.

³⁰ See Action 78 of “Theme 9: Participation, Empowerment, Cooperation and Accountability” of the [Action Plan for 2024-2026](#) of the National Traveller and Roma Inclusion Strategy (NTRIS II), p. 107, 31 July 2024.

³¹ The Centre for Effective Services, [Realising the promise of national equality policy: An evaluation of the processes of implementation of three national equality strategies](#), 2023.

³² Until October 2020, the Department of Justice and Equality was responsible for the implementation of the NTRIS.

Action Plan under nine themes.³³ They are being monitored by a high level NTRIS II Steering Committee, operating under the Minister for Children, Equality, Disability, Integration and Youth (MCEDIY), which includes representatives of Traveller and Roma organisations, as well as statutory and non-statutory bodies. Traveller interlocutors are still awaiting the establishment of new structures to realise the outcomes of NTRIS II. The Steering Committee will have a more strategic role than previously. It will have the power to address any issues that arise in the delivery of actions encountered across any of the nine themes of the strategy, either on a thematic basis or in terms of the work of a particular department or state agency. It will be also able to address the issue of intersectionality.

62. New targeted actions to promote Traveller and Roma culture, heritage and identity in Ireland are included in the NTRIS II, such as the development of a Traveller Heritage Strategy, combatting the negative stereotyping and addressing acknowledgement across all media formats of the difficult history of Travellers within the Irish state and of Roma in Europe, as well as the recognition of the equal status the Traveller and Roma communities hold today within the diversity of Irish society.³⁴

63. The Advisory Committee considers that the NTRIS II represents a critical obligation by the Irish authorities before the European Union, aligning with the push from Traveller organisations for a whole governmental approach addressing Traveller and Roma concerns. This convergence emphasises the need for co-ordinated efforts at both European and local levels to effectively address the multifaceted challenges faced by persons affiliating with the Traveller and Roma communities. The disappointment stemming from the lack of action on the previous NTRIS underscores the importance of transparency, accountability and genuine participation in the development process of the new strategy. The Advisory Committee considers that the new NTRIS II 2024-2028 and its Action Plan for 2024-2026, apart from a stronger outcomes-focused approach, with

achievable actions and clear performance indicators,³⁵ must ensure adequate resources, as well as cross-governmental co-operation, independent accountable monitoring structures and participation of Traveller and Roma communities to the process. Strengthening these elements is crucial to ensuring that the strategy translates into tangible improvements in the lives of persons belonging to Traveller and Roma communities. Separate and transparent funding ensuring central support to the national and local Traveller and Roma representative bodies would be welcome.

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.

Intersectional discrimination (Article 4)

65. The National Strategy for Women and Girls 2017-2020: creating a better society for all³⁶ (NSWG) provided a policy framework to improve outcomes for women and girls. Traveller and Roma women and girls were explicitly referred to in five of the 139 actions of that strategy relating to access to education, training and employment opportunities, health outcomes, and participation in public life, communities and in leadership positions. A new National Strategy for Women and Girls – the adoption of which has been delayed due to the Covid-19 pandemic, will have a stronger focus on results-based approach.

66. Under the NTRIS “Gender Equality” objective, the DCEDIY provides targeted support to facilitate Traveller and Roma women’s engagement in education, employment and economic development. Targeted funding is provided to the National Traveller Women’s Forum, Cairde and Waterford Area Partnership to support and promote Traveller and Roma women’s inclusion and equality in Irish society.³⁷

³³ The [Action Plan for 2024-2026](#) of the [National Traveller and Roma Inclusion Strategy 2024-2028 \(NTRIS II\)](#) includes the nine following themes: “Combatting Racism and Discrimination”, “Children and Young People”, “Gender Equality”, “Health and Wellbeing”, “Employment and Enterprise”, “Accommodation”, “Education”, “Culture, Heritage and Identity”, and “Participation, Empowerment, Cooperation and Accountability”.

³⁴ See Actions 60, 61 and 62 of “Theme 8: Culture, Heritage and Identity” of the [Action Plan for 2024-2026](#) of the National Traveller and Roma Inclusion Strategy (NTRIS II), pp. 85-87, 31 July 2024.

³⁵ See the Foreword by Roderic O’Gorman, Minister for Children, Equality, Disability, Integration and Youth, to the [National Traveller and Roma Inclusion Strategy II 2024-2028](#), p. 8, 31 July 2024.

³⁶ Department of Justice and Equality, [National Strategy for Women and Girls 2017-2020: creating a better society for all](#), April 2017.

³⁷ See the [fifth state report](#), pp. 48-50.

67. The Second National Strategy on Domestic, Sexual and Gender-based Violence 2016–2021 resulted in slow implementation and little evidence of positive outcomes for Traveller and Roma women. Mainstream awareness raising initiatives failed to reach many persons belonging to Traveller and Roma communities; a study on sexual violence prevalence did not include Travellers, Roma or other minority ethnic groups in its scope; and the commitment to collect data by ethnicity by all relevant agencies did not materialise. The Third National Strategy on Domestic, Sexual and Gender-based Violence 2022–2026 has been published³⁸ but it does not include any specific reference to Traveller and Roma women. This would have been welcome as in practice, barriers continue to be encountered by Traveller and Roma women who are subject to intersectional discrimination as regards access to support services, information and protection.³⁹

68. According to Traveller organisations, to date, actions related to Traveller women have not been adequately resourced, inclusion of Traveller women in broader gender actions has been insufficient and the associated implementation plans have failed to define or reach clear gendered targets, indicators or outcomes. About 40% of Traveller women experience discrimination in accessing health services (see Article 15) and 53.9% of Roma women respondents said that they felt discriminated against by the police and the courts system and 75% of them reported being stopped by *An Garda Síochána* (the National Police Force of Ireland, also referred to as “the *Garda*”) for an identity document (see Article 6).⁴⁰ Roma and Traveller women also experienced discriminatory treatment by the police, the court services, the Child and Family Agency and general support services, including in access to long-term accommodation. As regards the latter, this is often connected to their inability to prove their habitual residence in Ireland, which can impact on their ability to access shelters and/or long-term accommodation and escape domestic violence. Traveller organisations welcomed the

funding for a dedicated Traveller specific domestic and sexual violence pilot project, a community led project now being mainstreamed.

69. The Advisory Committee reiterates that “Article 6(2) contains the obligation of states parties to protect all persons against violence and discrimination on ethnic grounds”.⁴¹ Whilst recognising that gender-based violence against women and children affect also the majority population, the Advisory Committee emphasises the importance of designing special measures to enable women and children belonging to national minorities to report violence, in view of the potential risks of multiple and intersectional discrimination and the barriers to justice they face. Measures should hence be taken to combat all forms of gender-based violence against women and children with a view to effectively implementing the protection enshrined in Article 6(2) of the Framework Convention. Furthermore, poverty, policies against nomadism and poor housing and accommodation disproportionately affect Traveller and Roma women and girls. They are also faced with gender-specific disadvantages regarding school attendance records, literacy and employment. In this vein, the Advisory Committee emphasises the Council of Europe Recommendation CM/Rec(2024)1 of the Committee of Ministers to member States on equality of Roma and Traveller women and girls that provides guidance for effective action in fields such as civil registration, protection from extreme poverty, avoiding the removal of children from their families and placement in alternative care, accommodation or housing, education, healthcare, employment and protection against violence and human trafficking.⁴²

70. The Advisory Committee, while noting some developments such as the dedicated Traveller and Roma women specific domestic and sexual violence pilot project 2019–2022,⁴³ considers it important that Traveller and Roma women are involved in strategies focusing on gender equality and that Traveller and Roma organisations are actively included and consulted in the work of the

³⁸ See Zero Tolerance [Third National Strategy on Domestic, Sexual and Gender-Based Violence 2022–2026](#), and its two implementation plans ([DSGBV implementation plan](#) and [Third National Strategy on Domestic, Sexual and Gender-Based Violence - 2024 implementation plan](#)).

³⁹ [Baseline evaluation report Ireland by GREVIO](#), published on 14 November 2023. The Third National Strategy on Domestic, Sexual and Gender-based Violence (DSGBV) and its implementation plan foresee that standardised multi-annual funding will be managed and disbursed by the DSGBV Agency (*Cuan*).

⁴⁰ Pavee Point Traveller and Roma Centre, [Irish Traveller and Roma women – Joint Alternative Report to GREVIO on the Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence](#), August 2022.

⁴¹ See [ACFC Thematic Commentary No. 4](#), para. 55.

⁴² [Recommendation](#) CM/Rec(2024)1 of the Committee of Ministers to member States on equality of Roma and Traveller women and girls, adopted on 5 April 2024.

⁴³ See the [fifth state report](#), Appendix II Submission by various Traveller and Roma organisations, p. 89.

new Third Domestic, Sexual and Gender-based Violence Agency 2022-2026 (*Cuan*), which was established on 1 January 2024.⁴⁴ The Agency's 2024 budget is approximately €59 million, with over €47 million being allocated for support and services and over €6 million allocated for prevention and awareness raising initiative.

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.

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.

Support for the preservation and development of cultures and Traveller way of life (Article 5)

73. Under the "Cultural identity" chapter of the NTRIS, the government took actions to support Traveller culture, heritage and identities. In addition, a number of initiatives supported both Traveller and Roma cultures,⁴⁵ including funding of the annual Traveller Pride Week and International Roma Day celebrations, progressing a project with the National Museum of Ireland, adding the Cant language⁴⁶ and Traveller tinsmithing to Ireland's National Inventory of Intangible Cultural Heritage under UNESCO's guidance, and commencing a process of addressing different aspects of Traveller culture and history into the school curriculum (see Article 12 below). The Advisory Committee notes recent work on the

development of a National Traveller Heritage Strategy, in collaboration and partnership with national and local Traveller organisations,⁴⁷ as well as the launch by the University of Galway on 28 August 2024 of the Irish Travellers/*Mincéirs* Archives.⁴⁸ Generally, support is provided for national and local Traveller organisations whose remit covers the promotion of Traveller culture, including the promotion of the Cant language. The Galway City Museum has an exhibition about Traveller culture in their premises, in which it is indicated on the description of the exhibition that "Irish Travellers, or Mincéirs, are a traditionally nomadic ethnic minority, indigenous to the Island of Ireland". A photo exhibition "The Children of Carrowbrowne", a halting site situated right next to the city dump at the outskirts of Galway, was presented in 2023. The Minsleór Festival of Nomadic Cultures,⁴⁹ organised every year in Galway, attracts visitors not only from the Traveller community but much beyond, including Roma, Sámi and Tatar persons with nomadic or semi-nomadic way of life, thus combating negative prejudice and stereotypes.

74. Each government line department allocates funding for Traveller and Roma projects, which fall under their respective remits. Primary funding streams for Traveller non-governmental organisations are allocated by the DCEDIY, the Department of Health and the Department of Justice. The new Creative Ireland Programme 2023 – 2027 provides for targeted cultural initiatives that enhance inclusion and visibility of marginalised groups, including persons affiliating with the Traveller and Roma communities, paying particular attention to women and youth.⁵⁰

75. The research report on Traveller culture and history published in February 2023 noted that Cant/Gammon is spoken in Ireland by the Traveller community, to varying degrees, but that "[s]adly, the use of Cant/Gammon has diminished greatly over the years and lot of Cant/Gammon vocabulary has been lost".⁵¹ The report concludes that persons belonging to the Traveller community must decide how they want the language developed or passed on so that it can

⁴⁴ Press release, [Minister McEntee opens Cuan, the new statutory domestic, sexual and gender-based violence agency](#), published on 23 February 2024, last updated on 4 June 2024. A chief executive officer was also appointed.

⁴⁵ See the [fifth state report](#), pp. 38-41.

⁴⁶ Shelta is the academic term given to the language spoken by Irish Travellers. Cant and Gammon are both dialects of Shelta. Persons belonging to the Traveller community refer to their language as Cant or Gammon and rarely as Shelta. As per the wish expressed by the Traveller community, and agreed by the authorities, this Opinion refers to Cant as their language.

⁴⁷ See Action 60 of "Theme 8: Culture, Heritage and Identity" of the [Action Plan for 2024-2026](#) of NTRIS II 2026-2028. According to the authorities, the National Traveller Heritage Strategy shall be finalised by the end of 2024.

⁴⁸ University of Galway, [Mincéirs Archive celebrates Irish Traveller history and culture](#), 2 September 2024.

⁴⁹ See [Minsleór Festival of Nomadic Cultures](#), 28 September-1 October 2023. *Minsleór* means "wanderer" in Cant.

⁵⁰ See [Creative Ireland Programme 2023 – 2027](#).

⁵¹ National Council for Curriculum and Assessment, [Traveller culture and history research report](#), 2023, p. 42.

continue to be a part of their identity.⁵² Different views reportedly exist in Ireland within the Traveller community regarding the importance of preserving the language with one group describing as insignificant and a thing of the past, while the others as symbolic and wanting to see it revived. Furthermore, some persons belonging to the Traveller community are afraid to speak their language and see it as an internalised prejudice. The Cant/Gammon language has not yet seen the same level of resurgence as Irish although more Travellers have a renewed sense of pride in the language and take ownership of it as part of their identity.⁵³

76. The Advisory Committee notes that there was a tradition of tinsmithing among many Traveller families in Ireland. The tinsmith was an important part of Irish life before the mass production of plastics took over. The Advisory Committee learned from interlocutors that there are only two Traveller tinsmiths left in Ireland today, one of whom was met during the visit. It was reported that in recent years, some persons belonging to the Traveller community are trying to revive the craft among the younger generation. However, many of them no longer see this as a profitable option.

77. Persons belonging to the Traveller community shared mixed perceptions with the Advisory Committee about non-Travellers representing their culture, stating that there can be a tendency for artists and others to exoticise them through their representations. Many focus on poverty as opposed to culture. Very few non-Traveller artists seem interested in capturing the diversity that exists within the community. Nevertheless, exhibitions such as the one at Galway City Museum are supported by the Traveller community as a way of attracting and preserving Traveller culture and identity.

78. The Advisory Committee reiterates the preamble of the Framework Convention which states that “a pluralistic and genuinely democratic society should not only respect the ethnic, cultural, linguistic and religious identity of each person belonging to a national minority, but also create appropriate conditions enabling them to express, preserve and develop this identity.” The Advisory Committee reiterates that “[t]his may often require targeted efforts by the authorities to revitalise essential elements of the minority culture, without which the expression of some aspects of that identity may not be possible.”⁵⁴

79. The Advisory Committee welcomes the authorities’ decision to include in the National Inventory of Ireland’s Intangible Cultural heritage both the Cant language spoken by Travellers and tinsmiths. Based, *inter alia*, on the results of the research on Traveller culture and history, the Advisory Committee considers it important to further engage with persons belonging to the Traveller community in a more comprehensive debate on the future preservation of their language. In the Advisory Committee’s view, a detailed plan to revitalise the Cant language, including through media, could be developed by the authorities, following clear input by persons affiliating with the Traveller community.

80. The Advisory Committee also welcomes financial support allocated for small projects which aim to celebrate Traveller and Roma cultures. However, the Advisory Committee has noted that the funding provided towards some cultural activities is *ad hoc* in nature and project based. Supporting Travellers in preserving and developing their identities and cultures on a more permanent and ongoing basis is needed, including by exploring the possibility of creating a permanent Traveller cultural centre. Such a centre, with sustainable public funding, could research and publish on the Traveller’s history, collect and preserve artefacts, as well as stories and songs of Travellers, thus contributing to the preservation of the Cant language. The Advisory Committee notes with interest that the Minsleór Festival of Nomadic Cultures receives financial support from *inter alia* “Creative Ireland”. It would be worthwhile that local, regional and national authorities continue investing in such events. In addition, the Advisory Committee considers, for those interested, that possibilities should be created for the revitalisation of the tinsmith traditional occupation by Travellers by means of, for example, master-apprentices programmes.

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.

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,

⁵² Ibid, p. 43.

⁵³ Ibid, p. 42.

⁵⁴ See [ACFC Thematic Commentary No. 4](#), para. 67.

and popularisation among younger generation, in co-operation with the Traveller community.

Traveller culturally appropriate accommodation (Article 5)

83. Current trespass legislation⁵⁵ has the impact of prohibiting persons affiliating with the Traveller community from practising nomadism and makes it a criminal offence to trespass on any land which is private or publicly owned. Travellers who breach the requirements of this law face imprisonment and their homes (caravans) can be impounded. In many places, boulders have been erected by the local authorities in what used to be traditional camping places for Travellers. Travellers who pursue their cultural right to be nomadic often find that they are forced to live in substandard conditions on official and unofficial halting sites.

84. A notable achievement includes the formal recognition by the *Dáil* of Travellers as a distinct ethnic group in March 2017 which *de facto* recognises a distinct heritage of the Traveller community and nomadism as a central aspect of their culture and identity. This is independently from whether persons belonging to the Traveller community are practising nomadism for short or extended periods, for both economic or personal (visiting family and friends) reasons. While a considerable number (18.2%) of Travellers are still living in mobile homes or caravans, most are not nomadic. While the 1998 Housing (Traveller Accommodation) Act obliged local authorities to provide Travellers with transient sites (legal stopping places for nomadic purposes), the lack of overall provision has resulted in Travellers having no real means of practising nomadism. Nowadays, transient units are used as temporary or emergency accommodation and so therefore there are no transient units available for nomadic Travellers.

85. Planning issues are of a particular concern for Traveller culturally appropriate accommodation.⁵⁶ The development of accommodation is significantly hindered by the current planning system, including due to local opposition and the consequent politicisation of the process. Concerns regarding the 2023 Planning and Development Bill were raised with regard to the dilution of current obligations to provide Traveller-specific accommodation and

concerning the possibility of mounting legal challenges for failure to deliver.⁵⁷

86. Many persons belonging to the Traveller community have been on the social housing list for many years. These years are often spent living in unsatisfactory conditions and, as the Advisory Committee was informed by its interlocutors, over time, they sometimes change their accommodation preference away from culturally appropriate accommodation such as halting site or group housing type accommodations. Many persons belonging to the Traveller community give as their reason for change of preference that culturally appropriate accommodation will never come on stream or will not be available to them within a reasonable timeframe. They often indicate that they are more likely to obtain suitable accommodation in a shorter timeframe if they move away from halting sites and/or group housing type accommodations and express a preference for standard social housing.

87. Between 2008 and 2019, more than €72 million of funding for Traveller appropriate accommodation was left unspent by the local authorities.⁵⁸ While funds available for culturally appropriate accommodation have been spent by local authorities in the four consecutive years 2020-2023, there has been a significant reduction in the Traveller accommodation budget over recent years and most of the budget is spent on refurbishment and not on new builds, which fails to address the accommodation situation of many Travellers. Furthermore, there are no sanctions for local authorities in case of failure to meet their obligations to provide Traveller accommodation. In 2019, the IHREC invited 31 local authorities to review *inter alia* practices and procedures in relation to the provision of Traveller-specific accommodation. In 2020, upon the receipt of responses, local authorities were invited to address a list of concerns identified from the recommendations made by the IHREC that could be properly addressed through an Equality Action Plan. All actions are under review. The IHREC published Equality Action Plans from seven local authorities on Traveller accommodation on 26 June 2024, which stated that, despite some efforts, considerable challenges remained for

⁵⁵ Section 19a to 19h of the Criminal Justice (Public Order) Act of 2002, which comes under the Housing (Miscellaneous Provisions) Act of 2002, relates to offences in relation to entering or occupying land, public or private, which is commonly known as the Anti-trespass legislation.

⁵⁶ See [2021 Annual Estimate of Traveller Families in Local Authority and Local Authority Assisted Accommodation and on Unauthorised Halting Sites](#).

⁵⁷ IHREC, [Commission warns New Bill may have Significant Consequences for the Traveller Community](#), 2023.

⁵⁸ [Final Report of the Joint Committee on Key Issues Affecting the Traveller Community](#), November 2021, p. 15.

Travellers seeking to access accommodation services from local authorities.⁵⁹

88. Persons belonging to the Traveller community now reside in several types of accommodation, including official halting sites,⁶⁰ unofficial halting sites,⁶¹ group housing schemes,⁶² local authority housing, private rented accommodation, and their own private property. The development of culturally appropriate accommodation requires planners to take into consideration aspects of Traveller culture such as nomadism, the keeping of horses and work practices (for example, scrap collection which requires areas for materials to be stored at the homeplace) and extended families residing together.

89. The Galway City Council had engaged in a prototype housing project in an open space in the city centre (not surrounded by walls or isolated areas) after consultation with representatives of the Traveller community and also future neighbours. The Galway City Council also informed the Advisory Committee that several projects had been rejected by the authorities for environmental reasons (see Article 15). Over the years, Traveller organisations have consistently advocated for a national Traveller accommodation authority to address challenges effectively. According to them, such an authority would remove the issue of accommodation from the competences of local authorities and ensure a more co-ordinated and equitable approach nationwide. Regrettably, these issues remain unaddressed.

90. The Advisory Committee reaffirms that nomadic or semi-nomadic way of life of Travellers constitutes one of the essential elements of their history, culture and identities. It reiterates that substandard housing conditions for Travellers coupled with their spatial separation considerably affect their ability to participate in socio-economic life and result in further poverty, marginalisation and social exclusion. The Advisory Committee is deeply concerned about the accommodation situation of Travellers in Ireland. It considers that the measures taken to tackle shortage of culturally appropriate accommodation are, in

practice, insufficient. The Advisory Committee is troubled by this situation, which restricts the opportunity of Travellers to maintain their traditional nomadic way of life and does not take into consideration their needs and interests to maintain this tradition. It also prevents them to participate effectively to the socio-economic life of the society.

91. The Advisory Committee further notes that the provisions of the 1994 Criminal Justice (Public Order) Act governing trespass indirectly discriminate against Travellers by criminalising a way of life that is intrinsic to this group. Whilst it might be unrealistic to reintroduce a fully nomadic way of life and reintroduce transient halting sites throughout the country, the Advisory Committee considers that reviving a semi-nomadic tradition could be feasible.

92. The Advisory Committee also underlines the apparent contradiction between the formal recognition in the *Dáil* in 2017 of Travellers as an ethnic group with a distinct culture - as being a traditional nomadic or semi-nomadic way of life - with the forced assimilation and sedentarisation policies in place. Persons belonging to the Traveller community felt that recognition of Travellers' ethnic status provided a better opportunity to combat racism and discrimination, enhance societal integration and their inclusion and elevate the community's status both internally and within Ireland. They also saw its potential for promoting a broader societal understanding and a renewed positive narrative of Irish Travellers. Although, the Traveller Accommodation Expert Review Report contains a specific recommendation to repeal trespass legislation, regrettably, there has been no progress on this recommendation, or on the development of a network of transient sites, which was committed to in the Housing (Traveller Accommodation) Act 1998.⁶³ Furthermore, the Advisory Committee has constantly reiterated its concerns regarding the provisions contained in section 24 of the Housing (Miscellaneous Provisions) Act of 2002 criminalising trespass, and the impact it has had on the nomadic way of life of persons belonging to the Traveller

⁵⁹ IHREC, [Equality Action Plans from seven local authorities on Traveller accommodation](#), 26 June 2024.

⁶⁰ This is a purpose-built facility with access to services such as electricity and water.

⁶¹ This is where persons belonging to the Traveller community live in caravans, often without access to basic services such as water and electricity.

⁶² This is a small group of houses that have been built to accommodate persons belonging to the Traveller community. They are considered culturally appropriate as they take into account that members of the same family prefer to live closely together.

⁶³ Section 10 (3) (c) of the 1998 Act provides that "in preparing an accommodation programme a local authority shall have regard to the provision of sites to address the accommodation needs of Travellers other than as their normal place of residence and having regard to the annual patterns of movement by Travellers". However, there are currently no transient sites and no plans for the same in any of the 31 local authorities.

community. Therefore, it deeply regrets that its previous findings were not addressed by the authorities.

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.

Intercultural dialogue and mutual respect (Article 6)

94. Ireland continues its transformation into an ethnically and religiously diverse society. As of 2022, the number of non-Irish citizens increased to 12% of the total population. Religious diversity is also growing, with 81 930 persons identifying as Muslims and 2 193 people identifying as Jews, whilst the number of Hindus has more than doubled from 13 729 to 33 043.⁶⁴ Persons identifying as Travellers are mainly Catholic, though some belong to other faiths, while others are atheist or agnostic. Persons belonging to the Roma community have different religious affiliations.

95. In December 2022, the IHREC Annual Poll⁶⁵ found that 74% of respondents believe that Ireland is an inclusive and diverse society, and 55% are of the view that Irish people welcome diversity and interculturalism in society. Support for migrants and those seeking asylum remains strong in Ireland, as nearly nine out of ten (89%) people agree that no matter who you are, or where you are from, you should be treated equally. Nearly two thirds of people (62%) agree that Ukrainian refugees⁶⁶ are treated fairly in Ireland while 64% think the government greatly

supports them.⁶⁷ Over the past twelve months 38% of people personally witnessed racism in Ireland with more than one in ten (11%) directly experiencing it. Over recent years, the far-right is mobilising and signs such as “House the Irish first” are now appearing in the streets.

96. According to the national Survey on the People of Ireland’s attitudes towards diversity published in 2023,⁶⁸ Travellers and Roma are still among those communities less accepted in the Irish society. The survey highlighted little change in attitudes towards Travellers between 2017⁶⁹ and 2023 notwithstanding the recognition of Travellers as an ethnic group by the *Dáil* in 2017.

97. Whilst overall the Irish population is respectful of diversity, the situation regarding the Traveller and Roma population remains dire. Both Traveller and Roma individuals feel excluded from society. Generally speaking, Traveller and Roma representatives regretted the institutional racism that they experience on an everyday basis,⁷⁰ a situation that the authorities admit. The Travellers remain one of the most marginalised groups in Irish society. Representatives of civil society and Traveller organisations reported about numerous cases of denial of access to public places or services on the basis of their appearance, family name, address, inter-actions, manners, or their accent, and therefore presumed Traveller identity. Traveller representatives informed the Advisory Committee that derogative terms used to describe them are still being used in Ireland.

98. Traveller organisations expressed solidarity with Ukrainian refugees and welcomed the support by the government provided to them. However, Traveller interlocutors regretted that, for many years, the authorities refused them all types of assistance, including accommodation,

⁶⁴ Central Statistics Office, [Census of Population 2022 - Summary Results](#), 2023. However, over 736 000 people or 14% of the population living in Ireland reported they had no religion, an increase of 63% from Census 2016.

⁶⁵ [IHREC Annual Poll](#), 2022.

⁶⁶ As of the end of August 2023, Ireland was hosting approximately 92 707 refugees from Ukraine (62% female, 38% male), CSO, [‘UA38: PPSN allocations of arrivals from Ukraine’](#).

⁶⁷ However, discontent with the Direct Provision System, covering accommodation, food, money and medical services for asylum seekers, remains high with 64% of people agreeing that those in the system experience racism and discrimination, while 68% believe that the government should set a clear date to end the Direct Provision.

⁶⁸ IPSOS, national [Survey on People in Ireland’s attitude towards diversity](#), June 2023. In relation to 46 social groups, the survey asked respondents to indicate how comfortable they would feel about people from the different groups living ‘next door’ to them. Travellers and Roma were among the six groups that scored below average, both receiving 7.1 (the average score across the 46 groups was 8.7). Furthermore, 67% of the 3 008 respondents found that a Traveller would be put at a disadvantage in hiring (63% responded so for a Roma person).

⁶⁹ The [Traveller Community National Survey 2017](#) showed that 55% of non-Travellers would not have a Traveller as a community member, 35% avoided Travellers, 75% would not have a Traveller as a co-worker, 78% would not have a Traveller as a neighbour, 91% would not have a Traveller as a family member and 85% would not have a Traveller as a friend.

⁷⁰ An example was given of two young Roma musicians in Longford who had been regularly stopped by the police for ethnic profiling until the *Garda* discovered they were playing music in a pub.

whereas Ukrainian refugees have received substantial support from the authorities.

99. The Advisory Committee emphasises that Article 6 of the Framework Convention calls for proactive efforts to foster a climate of mutual respect, understanding and co-operation among all persons in society, where persons belonging to national minorities are recognised as an integral and valued part of a diverse society, who effectively enjoy equal access to rights and resources, while being provided with opportunities for social interaction and inclusion across difference. It reiterates the preamble of the Framework Convention which states that “the creation of a climate of tolerance and dialogue is necessary to enable cultural diversity to be a source and a factor, not of division, but of enrichment for each society”. This should be reflected and fostered through legislation and policies.

100. The Advisory Committee is worried about the complaints it had received regarding the negative attitudes towards persons belonging to the Traveller and Roma communities. It regrets that the Travellers’ symbolic formal recognition as a distinct ethnic group in 2017⁷¹ did not result in any substantive change in practice. Travellers are still denied access to public places or services in a discriminatory and arbitrary fashion. It therefore considers that concrete legislative and policy measures are needed by the authorities to tackle this situation (see Article 4). In addition, the Advisory Committee, emphasising the importance of strengthening intercultural dialogue and a spirit of mutual respect, welcomes actions 61 and 64 of “Theme 8: Culture, Heritage and Identity” on proposals for specific initiatives, such as the celebration of the 10th anniversary of the official recognition of Traveller ethnicity on 1 March 2027, and continuous support for the annual national and local Traveller Pride Week, International Roma Day (8 April) and European

Roma Genocide Memorial Day (2 August) as envisaged under the NTRIS II Action Plan.⁷² Still, the Advisory Committee is of the view that in general more could be done and achieved to increase knowledge about minorities and persons belonging to them and to sensitise the broader population, including pupils and students about the Traveller and the Roma cultures and histories. A structured and integrated approach is needed to promote awareness about and respect of these communities and persons affiliating with them.

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.

Protection from hostility, hate crime and hate speech (Article 6)

102. Ireland’s five-year National Action Plan Against Racism (NAPAR) was published in May 2023,⁷³ after repeated delays and the expiry of the previous action plan in 2008. It provides for a more co-ordinated approach to eliminating racism in all its forms, including racism against Travellers and Roma.⁷⁴ Furthermore, the Special Rapporteur on Racial Equality and Racism under the NAPAR will report on progress towards achieving the objectives of the Action Plan insofar as the Traveller and Roma communities are concerned.⁷⁵ In 2023, the IHREC commissioned the report entitled “Experiences of Second-Generation Ethnic Minority Young People in Ireland”, which showed that racism in Ireland comes in many forms, not just at the extremes, and can have a very negative effect on a person’s self-esteem and self-worth.⁷⁶ On 21 September

⁷¹ Prior to this 2017 formal recognition by the *Taoiseach* of Travellers as an ethnic group, Ireland recognised the structural disadvantage and social stigma to which Travellers are subjected, naming them as a protected group in equality legislation, as well as laws addressing incitement to hatred. The Prime Minister, however, pointed out that this recognition does not create any new individual, constitutional or financial rights. It is therefore unlikely to afford the Traveller community any additional rights given the protection afforded to the group prior to its recognition as an ethnic group. It is however believed that this recognition may give the community a firmer basis for arguing for the activation of these preexisting rights. Amanda Haynes, Sindy Joyce and Jennifer Schweppe, [The Significance of the Declaration of Ethnic Minority Status for Irish Travellers](#), December 2020.

⁷² Actions 61 and 64 of “Theme 8: Culture, Heritage and Identity” of the [Action Plan for 2024-2026](#) of the [National Traveller and Roma Inclusion Strategy 2024-2028 \(NTRIS II\)](#), pp. 86 and 91, 31 July 2024.

⁷³ Department of Children, Equality, Disability, Integration and Youth, [Minister Joe O’Brien announces publication of Ireland’s National Action Plan Against Racism 2023-2027](#), 2023.

⁷⁴ The NAPAR monitoring and implementation process involves a Special Rapporteur on Racial Equality and Racism, an Advisory Committee on Racial Equality and Racism and a NAPAR Co-ordination Committee.

⁷⁵ See Action 1 of “Theme 1: Combatting Racism and Discrimination” of the [Action Plan for 2024-2026](#) of the [National Traveller and Roma Inclusion Strategy 2024-2028 \(NTRIS II\)](#), p. 7, 31 July 2024.

⁷⁶ IHREC, [Experiences of Second-Generation Ethnic Minority Young People in Ireland](#), 2023.

2023, the DCEDIY announced the funding of 24 projects under the Ireland Against Racism Fund 2023, two of which are implemented by Traveller organisations.⁷⁷ According to the Irish Network against Racism (INAR), there were 600 reports of racist acts received in 2022. Enterprises and service providers were the most common perpetrators of racist attitudes.

103. Regarding hate crime and hate speech, a number of concerns were raised concerning the 1989 Prohibition of Incitement to Hatred Act, including its inadequacy for dealing with online hate speech.⁷⁸ In 2022, a new Bill on Criminal Justice (Incitement to Violence or Hatred and Hate Offences)⁷⁹ was proposed following a review of the Prohibition of Incitement to Hatred Act from 1989. It cannot be overstated how urgently this legislation is needed due to the prevalence of racial violence targeting Travellers and the Traveller community, including assaults and arson attacks on homes and caravans, without prosecution of persons responsible. The new bill contains provisions criminalising any intentional or reckless communication or behaviour that is likely to incite violence or hatred against a person or persons on account of a protected characteristic.⁸⁰ The 2022 Online Safety and Media Regulation Act addresses harmful online content by regulating the implementation of measures to improve the safety of users when engaging with online content and by regulating against the dissemination of harmful online content.

104. Data on hate crimes and hate speech are collected by the *Garda* on the national computer system PULSE (Police Using Leading Systems Effectively). Non-crime hate incidents are

recorded on the Pulse System as hate related, having been assigned the appropriate bias motivations.⁸¹ Furthermore, there is no available data about the extent to which the incidents recorded by police are brought before the prosecutors and pursued through the courts. The *Garda* has adopted the working definitions for hate crime and hate incidents based on bias motivations.⁸² In addition, there are currently 481 *Garda* Diversity Officers (GDOs) who have been trained to actively engage with and address the concerns of individuals affiliating with minorities. According to figures based on new recording practices from the *Garda*,⁸³ there were 582 hate crimes and hate related (non-crime) incidents recorded in 2022 - 510 hate crimes and 72 hate related (non-crime) incidents. This represents a 29% increase on 2021 figures.

105. Interlocutors from the Traveller and Roma organisations welcomed the publication of the new NAPAR, which includes an explicit reference to Travellers as being directly covered by all provisions and recommendations in the Action Plan.⁸⁴ They also welcomed the fact that the NAPAR contains provisions setting out a more co-ordinated approach to eliminating racism against Travellers. Despite this, interlocutors mentioned that there are no specific actions relating to the Traveller and Roma communities, in particular targeting racist attitudes persons affiliating with these communities encounter in the employment, housing, health and education sectors. They noted that “the Actions in the plan are not specifically focused on any particular group affected by racism or discrimination in Ireland; rather, they relate to a wide variety of groups.”⁸⁵ While the authorities would fully accept that there are particular nuances to racism

⁷⁷ The Irish Traveller Movement concerning the Yellow Flag Programme to support inclusion and inter-culturalism within schools (€98 000) and the Galway Traveller Movement concerning Galway Communities Against Racism and Discrimination - Collective Action for Change (€10 000).

⁷⁸ IHREC, [Review of the Prohibition of Incitement to Hatred Act 1989](#), 2019.

⁷⁹ [Criminal Justice \(Incitement to Violence or Hatred and Hate Offences\) Bill 2022 – No. 105 of 2022 – Houses of the Oireachtas](#).

⁸⁰ The IHREC made several recommendations to the Bill, including the expansion of protection to align with the Equality Acts, the alignment of the definition of hatred with international standards, and proportionate penalties. Online hate speech and internet intermediaries also need to be addressed. IHREC, [Submission on the General Scheme of the Criminal Justice \(Hate Crime\) Bill](#), February 2022, pp. 24-25.

⁸¹ OSCE ODIHR Hate Crime Reporting, [National frameworks to address hate crime in Ireland](#).

⁸² Hate crime is “any criminal offence which is perceived by the victim or any other person to, in whole or in part, be motivated by hostility or prejudice, based on actual or perceived age, disability, race, colour, nationality, ethnicity, religion, sexual orientation or gender.” Hate Incidents – (Non-Crime) is “any non-crime incident which is perceived by any person to, in whole or in part, be motivated by hostility or prejudice, based on actual or perceived age, disability, race, colour, nationality, ethnicity, religion, sexual orientation or gender”, [An Garda Síochána, Hate crime](#).

⁸³ [Statistics - Garda, Hate crime and hate related incidents 2022](#).

⁸⁴ The DCEDIY published the [National Action Plan Against Racism - first implementation report for 2023-2024](#) capturing the implementation status of each action under the plan, in consultation with the Co-ordination Committee. Traveller and Roma representatives sit on the new Advisory Committee on Racism and Racial Equality, which assists in monitoring, and has oversight of, the NAPAR.

⁸⁵ DCEDIY, [NAPAR first implementation report for 2023-2024](#), p. 3.

directed against Traveller and Roma communities and individuals affiliating with them, it is not the intention of the NAPAR to address all those nuances at a granular level. According to Traveller and Roma interlocutors, there are clear examples of anti-Traveller and anti-Roma racism in Ireland, including institutional. Therefore, the NAPAR needs specific measures in this area, as well as an adequate budget and a clear implementation and monitoring framework. Furthermore, they considered that the NAPAR lacks specificity, and the accompanying one-year implementation plan is not publicly available.⁸⁶ Therefore, the timeline, specific targets, the responsible implementing body and the source of funding for each action are still unclear. There is also no accountability framework in place to enforce sanction, if necessary.⁸⁷ Interlocutors from the Traveller and Roma organisations welcomed the pending amendments in the 2022 Bill on Criminal Justice stating that the proposed definition of incitement to hatred is more extensive than the one contained in the current legislation, and, for the first time, it refers to Travellers as a minority ethnic group.

106. The Advisory Committee emphasises that it is an obligation of states parties to undertake appropriate measures to protect persons who may be subject to threats or acts of hostility or violence as a result of their ethnic, cultural, linguistic or religious identities and affiliations. The Advisory Committee further reaffirms that all expressions of racism or intolerance must firmly be condemned, and, in cases of criminal relevance, be effectively prosecuted and sanctioned. The authorities need to regularly monitor this process so as to be able to address any issues in a timely manner.

107. The Advisory Committee considers that the introduction of the NAPAR is a long-awaited and positive step. While it welcomes the fact that the NAPAR protects all individuals and communities from racism and that Traveller and Roma representatives participate in the Advisory Committee on Racism and Racial Equality, the Advisory Committee, however, regrets the absence of specific measures against racist attitudes towards persons belonging to the Traveller and Roma communities in the NAPAR. It also regrets to note the lack of clear implementation and monitoring mechanisms. The Advisory Committee considers that the existence of action plans and some core baseline indicators have the potential to improve the implementation of the NAPAR. The objectives set out therein

must be followed by concrete, well-targeted substantial measures. The process of the implementation of the strategy, as well as its action plans, requires an active involvement of diverse representatives of persons belonging to the Traveller and Roma communities, thus ensuring that different needs and interests are taken into account.

108. The Advisory Committee believes that actions are needed against over-policing and under-protection of persons belonging to the Traveller community. Furthermore, strategies should be designed for the recruitment, retention and advancement of a police service to fully reflect the diversity of Irish society, including specific targets for diversity in recruitment procedures, and regular evaluation of promotion policies to address underrepresentation of minorities.⁸⁸

109. The Advisory Committee is of the view that the amendments to the 2022 Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill need to be finalised in a speedy manner and afford adequate resources for the full implementation of this bill. It is a critical step forward in addressing racially motivated violence against Roma and Travellers. By criminalising intentional or reckless behaviour that incites violence or hatred based on protected characteristics, this legislation represents a long-awaited and crucial safeguard for these marginalised communities and persons affiliating with them.

110. The Advisory Committee is of the view that complementary special measures, including anti-racism training for criminal justice professionals and a public awareness campaign, are also needed. The authorities should also set up a data collection system offering an integrated and consistent view of cases of hate crime and hate speech, with fully disaggregated data by category of offence, type of hate motivation, target group, as well as judicial follow-up and outcome. Data disaggregated by *inter alia* ethnic affiliation on hate crime and hate speech should also be systematically collected, and targeted preventive measures in response should be designed. Furthermore, a definition of diversity should have been added into the Policing, Security and Community Safety Bill enacted on 7 February 2024⁸⁹ to ensure that diversity requirements for local community safety partnerships include “structurally vulnerable groups” such as Travellers.⁹⁰

⁸⁶ IHREC, [Developing a National Action Plan Against Racism: Submission to the Anti-Racism Committee](#), 2021.

⁸⁷ IHREC, [Accountability needed from State to Combat Racism](#), 2023.

⁸⁸ IHREC, [Submission on the Policing, Security and Community Safety Bill](#), 2023, p. 45.

⁸⁹ [Policing, Security and Community Safety Act 2024](#), 7 February 2024.

⁹⁰ IHREC, [Submission to the Minister for Justice on the General Scheme of the Garda Síochána \(Digital Recording\) Bill](#), 2022, pp. 38-40.

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.

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.

Law enforcement and racial profiling (Article 6)

113. Generally speaking, persons belonging to the Traveller community do not have enough trust in the law-enforcement authorities. The findings of a survey from 2021⁹¹ show that the high levels of trust and confidence enjoyed by the *Garda* among the general population are not shared by the Traveller population. Almost half of Travellers surveyed (45%) had been victims of criminal offences in the five years prior to the survey and only one-fifth of people who had committed offence against Travellers had been arrested in that time period. Of these, 72% made a police report but 83% felt that the *Garda* did not take their report seriously, 67% said they were not treated respectfully, and 85% were dissatisfied with the service provided. 64% of respondents in *Garda* custody stated that they did not feel safe in the detention facilities. About 43% stated that they were not offered access to a solicitor. According to the *Garda* Ombudsman Commission the use of complaint mechanisms by persons belonging to Traveller and Roma communities in relation to police abuse is extremely low due to a number of factors, including reporting mechanisms which can create a barrier. Blanket CCTV surveillance of Traveller halting sites and blanket searches of group housing schemes and halting sites raised concerns and an amendment of the 2022 *Garda* (Recording Devices) Bill was recommended by the IHREC to safeguard against this activity.

114. The *Garda* Code of Ethics does not specifically prohibit ethnic and racial profiling. Where a breach of the Code may occur, there are no mandatory standards against which members of the police will be monitored or sanctioned. The Policing Authority raised the matter of racial profiling, but the *Garda* Commissioner told the Policing Authority that he did not believe the *Garda* has such a practice.⁹² New regulations were introduced ahead of the 2022 recruitment campaign, amending the 2013 *Garda Síochána* (Admissions and Appointments) Regulations to allow for a broader appeal for service with the *Garda* to reflect the increasing diversity of Irish society. The *Garda* also operates an internship programme aimed at recruiting civilian staff from diverse communities, including persons belonging to the Traveller and Roma communities. No data is, however, available on this.

115. There is a disproportionate number of Traveller men and women in prisons. Although Travellers account only for 0.66% of population according to the 2022 census, 10% of the entire prison population are Travellers, 15% of the male prison population are Travellers and 22% are Traveller women.⁹³ A fifth of young people in custody in Oberstown Children Detention Campus are Travellers, and almost 10% of the people under probation supervision are Travellers. On 31 August 2023, there were 4 629 persons in custody. Out of those, 410 persons belonging to Travellers (377 male and 33 female) declared their ethnicity and 24 belonging to the Roma community (23 male and one female). On 31 August 2023, 9.4% of the prisoner population were persons identifying as Travellers and Roma.

116. Acknowledging that the legislation provides that any person who does not pay the fine issued for speeding or shoplifting may be taken into custody, the Advisory Committee considers that it disproportionately affects persons belonging to the Traveller community as they often do not have the means to pay the fine upfront. Disproportionate conviction of persons belonging to the Traveller community for petty crimes and minor offences, including women, lead to their over-representation in prisons. Short custodial sentences or detention on remand can have a detrimental impact on family life for Traveller women particularly where they are primary carers or in a single parent family.

⁹¹ Sindy Joyce, Olive O'Reilly, Margaret O'Brien, David Joyce, Jennifer Schweppe and Amanda Haynes, [Irish Travellers' Access to Justice](#), 2022.

⁹² The Journal, [Policing Authority 'not satisfied' with Garda Commissioner's comments on Traveller profiling](#), 2022.

⁹³ Based on a census of Travellers in prison, [Irish Prison Service](#), November and December 2018.

117. The Equine Centre at Castlerea Prison is a collaboration between the Irish Prison Service and the horse racing industry. The equine programme, a first of its kind in Europe, has a high level of interest from Travellers for whom horses, including horse trading and horse ownership, form a very important aspect of Traveller culture and identity.⁹⁴ Prisoners face many barriers to successful inclusion back into society and the equine programme can have a positive impact on physical and mental wellbeing, offer preparation for employment and ultimately make the community safer through a reduction in reoffending. There has been significant participation in the equine programme from prisoners belonging to the Traveller community. 28 prisoners have completed the course since its inception, with 30% of the participants affiliating with the Traveller community. Most of the prisoners that have completed the course have become mentors for the future group.

118. The Advisory Committee is concerned that persons belonging to minorities who lack confidence in the police due to racial profiling practices tend to be reluctant to report acts of racist violence, meaning that such crimes may go unpunished. The authorities should therefore develop measures that empower victims of such crimes and deter under-reporting, due to several factors such as educational disadvantage and the digital divide, where many persons belonging to the Traveller community lack access to broadband or computers and IT. For this purpose, the strengthening of the effectiveness of oversight mechanisms and eliminating racial bias among law enforcement officials should be addressed through systematic initial and in-service training. The prohibition of racial profiling needs to be included systematically in the training curriculum for police officers.⁹⁵

119. The perception by persons belonging to the Traveller community is that their community is over-policed and that the judiciary and *An Garda Síochána* are stricter with them in prosecutions and sentencing, and they are over-represented in prisons. In light of this, the Advisory Committee supports the IHREC's proposal for a broad prohibition on discrimination on the grounds of criminal conviction.⁹⁶ A call for recognition of intersectional discrimination, removal of exemptions in the Equal Status Act which prevent challenges to discriminatory laws, and removal of overbroad defences with potential for misuse are

needed. Furthermore, the Advisory Committee suggests reducing the rates of custodial sentencing for non-payment of fines to Traveller women through the use of the 2014 Fines (Payment and Recovery) Act which expands the options available for recovery of fines and to reduce the number of persons imprisoned resulting from the failure to pay a fine. The introduction of alternative community-based responses for Traveller and Roma individuals who have committed non-violent poverty related offences should be introduced.

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.

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.

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.

Presence of Travellers in the media (Article 9)

123. Following a public consultation, Raidió Teilifís Éireann (RTÉ) prepared a Public Service Statement setting out the principles to be observed and activities to be undertaken.⁹⁷ In 2022, it includes *inter alia* among principles "Diversity and culture" which is defined as providing programmes and content that cover a wide range of interests – both mainstream and niche. However, the text does not include "Travellers" as a specific target and does not promote the representation of the Traveller community in the work of RTÉ, either as presenters or as developers of programmes.

124. On 15 March 2023, the 2022 Online Safety and Media Regulation Act was commenced and a new multi-person media commission (known as *Coimisiún na Meán*) was formally established. This new regulator will, among others, apply binding online safety codes to designated online services with the aim of minimising the availability

⁹⁴ National Council for Curriculum and Assessment, [Traveller culture and history research report](#), 2023, pp. 22-23.

⁹⁵ See also the recommendations contained in [ECRI General Policy Recommendation No.11 on combating racism and racial discrimination in policing](#), adopted on 29 June 2007.

⁹⁶ IHREC, [Submission on the Review of the Equality Acts](#), 2023, pp. 65-67.

⁹⁷ See Public Service Statement of [Raidió Teilifís Éireann \(RTÉ\)](#).

of some of the most serious forms of harmful online content, including hate speech. The National Action Plan Against Racism addresses the dissemination of racist online hate content.

125. The Advisory Committee underlines that in order for public service broadcasting to reflect the cultural and linguistic diversity existing within society, it must guarantee an adequate presence of persons belonging to national minorities and their languages. It emphasises the significance of the role played by the media in contributing to societal cohesion and good inter-ethnic relations. It reminds the authorities that “it is important for the formation of an open and pluralist media environment that issues of concern to minority communities generally are given weight in the broader public media debate and that persons belonging to such minorities are portrayed as integral members of society”.⁹⁸

126. In this context, the Advisory Committee considers it vital that media professionals and journalists obtain adequate training to increase their awareness of and sensitivity towards the specific and contemporary needs and concerns of diverse communities and persons belonging to the society, including by actively involving persons belonging to national minorities in the preparation and presentation of both mainstream and minority language programmes. In this vein, the Advisory Committee welcomes the fact that RTÉ has in its Public Service Statement a reference to “Diversity and culture”. However, it regrets that “Travellers” is not specifically mentioned as a specific target and that the representation of Travellers is not promoted in the work of RTÉ.

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.

Access to quality education (Article 12)

128. A recent report by the Department of Education⁹⁹ shows positive trends in the field of education of Traveller pupils. In the 2020-2021

school year, there was the highest recorded number of Traveller pupils in post-primary schools (3 292), as well as the highest number of Traveller pupils sitting the Leaving Certificate programme (412). However, the poor rate of young Travellers completing education persists with only 31.4% of those who had entered the first year in 2016 sitting their leaving certificate in 2021/2022.¹⁰⁰ This means that every year a critical 68.6% of Traveller youth aged between 12 and 14 do not finish secondary school. They will be more likely to face unemployment as adults, thus requiring the need for social welfare just like generations before them. The National Access Plan sets a target aiming to increase the number of new entrant Travellers in higher education to 150 by 2028. However, the current overall number of Travellers in higher education remains too low and a more ambitious approach is required, according to Traveller interlocutors. The Department for Further and Higher Education, Research, Innovation and Science (DFHERIS) established a new funding line of €1.35 million over three years to assess the mid-term review of the results of this target, which is foreseen in 2025. In addition, the Dormant Accounts Funds of €450 000 were used by DFHERIS to double the budget to support Travellers’ access to further education in 2022.

129. Traveller children from early childhood education and throughout schooling face significant inequalities, including the perceived lack of their engagement in school and problematic relationships with peers and teachers. While there is almost full attendance by Traveller children in primary schools and a high transfer rate of Travellers to post-primary education, attendance and retention rates at this level remain poor and evidence shows that Travellers cease their education on average 4.7 years earlier compared with the majority population. The disproportionate use of reduced timetables, the lack of representation of Traveller culture and identity, bullying by classmates and teachers and the lack of progress in ensuring a more inclusive curriculum through the enactment of the Traveller Culture and History in Education Bill 2018 are matters of profound and deep

⁹⁸ See [ACFC Thematic Commentary No. 4](#), para. 63.

⁹⁹ Department of Education, reports ‘[Pupils from the Traveller Community 2016-20’](#) and ‘[Primary and Post Primary Traveller Statistics 2016-20’](#), 14 June 2023. See also “[Education Indicators for Ireland](#)”, March 2024, prepared by the Department of Education and the Department of Further and Higher Education, Research, Innovation and Science.

¹⁰⁰ There has been a modest rise in the number of Traveller new entrants over time (52 in 2021/2022). There was, however, a shortage in this trend during Covid-19 pandemic with only 33 new entrants in the 2020/2021 academic year. Traveller enrolment within higher education institutions has grown from 77 in 2011/2012 to 119 in 2020/2021. See additional replies from the Irish Government, 23 October 2023. See also the report “[Retention rates for pupils in second-level schools – Entry cohort 2016](#)”, October 2023.

concern.¹⁰¹ Recent state data shows that primary schools are four times more likely to reduce the length of the school day for a Traveller child and they are 12 times more likely to have their school hours cut at secondary level. Children attending “special schools” are more than 22 times more likely to be told to attend for fewer hours or days.¹⁰²

130. The situation is similar with the pupils and students belonging to the Roma community. In particular, 25% of Roma children report to have attended school hungry and 57.5% of Roma do not have sufficient financial resources to buy educational materials and uniforms.¹⁰³ In 2023, for the second consecutive year, the DCEDIY is providing Dormant Account funding to Cairde to continue their Roma Education Programme project established in 2022. This programme is the only one for Roma in Ireland that operates online, and the only dedicated education programme specifically designed for, and with, Roma in the country targeting adults belonging to the Roma community (mostly women). The classes include teaching of English language, as well as literacy and computer classes.

131. In October 2023, the SUSI grant for fees was expanded to part-time students.¹⁰⁴ However, in order to mitigate systemic barriers that Traveller and Roma students face in accessing tertiary education, the SUSI grant scheme needs to be made available automatically to all persons affiliating with the Traveller and Roma communities who are accepted to third level courses part-time and full time, so as to increase the numbers of these persons in tertiary education. Furthermore, admission processes to third-level courses should encompass broader considerations that go beyond mere points systems to prevent further disadvantage to

Traveller and Roma students. Similarly, the introduction of Traveller and Roma university study programme and courses, taught by Travellers and Roma educators, would enrich the educational experience of the majority population, and promote greater inclusivity within higher education and much needed employment for persons belonging to these communities.

132. Additional support is available to pupils with special educational needs in all mainstream schools under the Special Education Teaching (SET) allocation model. For 2023, the funding provided by the state will be substantially increased by over 10% on last year, amounting to over €2.6 million for 2023 aiming at supporting children and young people with special educational needs and the schools they attend. A range of other actions in the area of Traveller and Roma education are included both within and outside the NTRIS framework.¹⁰⁵

133. In 2022, the Department of Education commissioned research on the effectiveness of their anti-bullying procedures and guidelines for primary and post-primary schools, based on Traveller and Roma pupils’ experiences.¹⁰⁶ Subsequently, in March 2022, a report entitled “A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils’ experiences in the school system”¹⁰⁷ was published by DCU Anti-Bullying Centre at the Dublin City University. A series of recommendations to improve the school experience of Traveller and Roma pupils, including on bullying reporting procedures, anti-racism training, and promoting a positive school culture, respect and inclusion were made in the report. In December 2022, the Minister for Education launched “*Cineáltas* - Action Plan on Bullying”¹⁰⁸ which includes, among others, a

¹⁰¹ IHREC, [Ireland and the Rights of the Child](#), 2022, pp. 84-87.

¹⁰² Department of Education, [Ministers Foley and Madigan publish report on use of reduced school days](#), September 2023.

¹⁰³ Pavee Point Traveller and Roma Centre, [The National Roma Needs Assessment – Education Briefing](#), 2018, p. 3.

¹⁰⁴ SUSI is Ireland’s national awarding authority for further and higher education grants. See article “[SUSI Grant for Fees Expanded to Part-time Students](#)”, 12 October 2023.

¹⁰⁵ This includes ten new Home School Community Liaison (HSCL) co-ordinator posts serving 14 non-Delivering Equality of Opportunity in Schools (DEIS) post primary schools with high numbers of Traveller and Roma students and the independent evaluation of a pilot project ‘Supporting Traveller and Roma (STAR)’ conducted in Galway, Wexford, Dublin and Cork with the aim of addressing the barriers impacting on Traveller and Roma attendance and participation and retention in education. Whilst at the level of the Department of Education, a Traveller and Roma Education Strategy is developed in close consultation with relevant stakeholders and Traveller and Roma communities, this objective has not been met yet and the first phase of consultation opened in July 2023. See more details in additional replies from the Irish Government, 23 October 2023.

¹⁰⁶ The consultation was conducted with 170 children and young people with special educational needs, including Traveller and Roma children.

¹⁰⁷ Dr. Maeve Dupont, DCU Anti-Bullying Centre, [A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils’ experiences in the school system](#), March 2022.

¹⁰⁸ [Cineáltas: Action Plan on Bullying](#), December 2022.

focus on creating an inclusive school culture and environment and training for all school staff to this effect, as well as measures to tackle bullying, including identity-based bullying. The *Cineáltas* Implementation Plan 2023-2027¹⁰⁹ was launched in April 2023.

134. Traveller and Roma organisations welcomed the explicit mention of Traveller and Roma participation in the National Access Plan for Higher Education 2022-2028.¹¹⁰ However, none of the mainstream education strategies contain targets aimed at increasing Traveller or Roma participation in early, primary or post-primary levels of education. The inequalities and exclusion faced by Traveller and Roma children in education are now exacerbated by the differential effects of Covid-19 which has left Traveller and Roma learners at all levels attempting to undertake home study in the context of very difficult living conditions and often without access to WiFi or IT. Representatives of Traveller organisations considered it an ongoing ambiguity regarding the adoption of the Traveller and Roma Education Strategy (TRES) which remains an urgent and outstanding priority. However, an in-depth consultation process for its development was completed in April 2024 and the strategy was adopted on 16 July 2024.¹¹¹ Moreover, Traveller organisations are concerned by the experiences of exclusion, racism and identity-based bullying of Traveller and Roma children in schools. Bullying and racist name-calling is not taken seriously when Traveller children report it to school staff and bullying by teachers is also cited as one of the most frequent types of bullying that Traveller pupils and students experience: 12.2% of Travellers surveyed indicated that they had been bullied by teachers several times a week, including through verbal abuse and exclusion.¹¹² Results of the study also show that Roma respondents had to hide their identity to prevent or protect themselves against bullying and discrimination, both by peers and by school staff.¹¹³

135. Interlocutors from the Traveller and Roma communities welcomed the development of the *Cineáltas* - Action Plan on Bullying 2022 in

primary and post primary schools, which further needs to be implemented in collaboration with Traveller organisations and organisations working with the Roma community. The Action Plan does not, however, specifically address identity-based bullying for Travellers as an ongoing problem.¹¹⁴ In recent research reports, 19% of Traveller pupils reported having been bullied in the past year at school, with 50% believing it to be based on their identity. 62% of those students were bullied in the playground during break time and 46% in the classroom while the teacher was present. In higher education, a total of ring-fenced €450 000 per year for three years for 21 Higher Education Institutions has been allocated. There is improvement in retention, but still disappointingly low with just 33 students commencing undergraduate studies in 2020/2021, against an already low target of 150.

136. Traveller parents highlighted the importance of quality education for their children and an inclusive environment in school. They pointed out that the current obstacles for access to education include difficult transitions to, and lower levels of support at post-primary level; low expectations and negative treatment in school; more negative treatment as compared to their settled peers; discrimination and racism undermining their children's education with detailed incidents of racist name-calling; lack of understanding of Traveller culture in school and educated based on "settled school for settled children". Teachers are perceived as often having stereotypical beliefs about Traveller students, such as girls planning to 'run-away' to get married at 16.

137. The Advisory Committee reiterates that ensuring equal opportunities for access to quality education at all levels for persons belonging to national minorities as enshrined in Article 12(3) of the Framework Convention requires states to act resolutely in a number of areas. States should "monitor school attainments, including absenteeism and drop-out rates, literacy, completion of studies, grades, gender disparities, access to higher educational levels and

¹⁰⁹ [Cineáltas Implementation Plan 2023-2027](#) sets out the commitment to implementing each of the 61 actions contained in *Cineáltas* within a five-year period and sets out timeframes about how the actions will be implemented.

¹¹⁰ Higher Education Authority, [National Access Plan 2022-2028](#), 2022.

¹¹¹ Government of Ireland, [Programme for Government: Our Shared Future](#), 29 October 2020. See also the [Traveller and Roma Education Strategy \(TRES\) 2024-2030](#), alongside the [Plan for implementation and action for 2024-2026](#), 16 July 2024.

¹¹² Dr. Maeve Dupont, DCU Anti-Bullying Centre, [A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system](#), 2022, p. 16.

¹¹³ [Roma in Ireland – a National Needs Assessment](#), 2018, p. 53.

¹¹⁴ Dupont. M., [A study into the effectiveness of the Anti-Bullying Procedures on Traveller and Roma pupils' experiences in the school system](#), DCU ABC, 2022.

subsequently access to employment.”¹¹⁵ Adult education is a necessary complement to the basic education system. This, however, requires the collection of accurate and reliable disaggregated data, including by gender and ethnic affiliations, to assess the situation and find adequate solutions.

138. The Advisory Committee commends the authorities for the various policy and practical measures to foster effective access to education for Traveller and Roma pupils and students. It welcomes in particular that the segregation of Traveller pupils is being phased out,¹¹⁶ but concerns remain that, despite focused support within mainstream education, Traveller students continue to struggle. The measures in the National Access Plan for Higher Education 2022-2028 are also welcome and due attention should be given to their implementation in close co-operation with representatives of Traveller and Roma communities, including the youth. While students can self-identify as Travellers or Roma with the consent of their parents or guardians, not all Travellers and Roma may choose to self-identify as such. Therefore, their total number in schools might be underestimated.¹¹⁷ An analysis would be needed to determine whether the reduced timetables disproportionately affect pupils and students affiliating with the Traveller and Roma communities. The Advisory Committee is of the view that the guidelines for reduced timetables¹¹⁸ should be statutory, and more efforts are needed to monitor and prevent their disproportionate negative impact on Traveller children’s education. The Advisory Committee welcomes the authorities’ efforts in developing an inclusive school environment by combatting bullying. However, it considers that *Cineáltas* - Action Plan on Bullying needs to be coupled with clear and targeted implementation measures.

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.

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 co-operation and partnership with Traveller and Roma organisations.

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.

Intercultural education, school curriculum and assessment (Article 12)

142. In 2019, the National Council for Curriculum and Assessment (NCCA) published a curriculum audit on Traveller history and culture across early primary and post-primary levels of education. The audit identified areas across the curriculum where teachers could teach about aspects of Traveller history and culture. The updated research report of the NCCA¹¹⁹ was published in February 2023 to advance the understanding of Traveller culture and history and to support learning and teaching across the curriculum. An Expert Group of Travellers and Traveller representatives reviewed and gave feedback on the report which provides a basis for the development of resources and materials for teachers/practitioners. The NCCA will work in particular with Traveller organisations to create lesson plans for schools on incorporating Traveller culture and history across the

¹¹⁵ See [ACFC Thematic Commentary No. 1 on Education \(2024\)](#) under the Framework Convention for the Protection of National Minorities, adopted on 31 May 2024, revising and replacing the [ACFC Thematic Commentary No. 1 on Education](#) (2006), para. 50.

¹¹⁶ According to some interlocutors, one Traveller only school remain active in Ireland.

¹¹⁷ Department of Education, [Reduced School Days - 2022/23 School Year](#), September 2023, which publishes the data with (Traveller/Roma) ethnicity on reduced school days where consent is given to indicate ethnicity.

¹¹⁸ The Guidelines on reduced hours timetables, published by the Department of Education in September 2021, require written consent from parents/guardians and Tusla Education Support Service (TESS) must be notified before a reduced hours timetable can be applied.

¹¹⁹ National Council for Curriculum and Assessment, [Traveller culture and history research report](#), 2023.

curriculum.¹²⁰ This Strategic Action builds upon the NCCA's Audit of Traveller Culture and History in the Curriculum (2019) and the NCCA Traveller Culture and History report from 2023. The NCCA has also started updating the Intercultural Guidelines for schools identifying measures as to how intercultural education can be integrated into the curriculum through a shared sense of language, culture and ethnic diversity. Intercultural Guidelines are therefore issued to all primary and post primary schools which promote and support cultural and ethnic diversity, inclusive culture and environments in schools and raise awareness around language, culture and ethnic diversity for all children and young people, including Roma.

143. The Delivering Equality of Opportunity in Schools (DEIS) Programme is a policy initiative of the Department of Education to address concentrated educational disadvantage at school level in a targeted and equitable way in the primary and post-primary levels of education. While only 20% of pupils overall attend DEIS schools, approximately 67.5% of Traveller children attend DEIS primary and post primary schools.¹²¹ The Department of Education is funding a new DEIS and diversity post in the Professional Development Service for Teachers, who co-ordinates the development and delivery of Continuing Professional Development (CPD) programmes for teachers in all schools. The refined DEIS identification model, announced in March 2022, includes components to reflect the educational disadvantages experienced by students who have identified as Travellers or Roma. The DEIS Plan refers to Travellers as a group at risk of educational disadvantage and includes specific actions in relation to Traveller and Roma education to promote improvements in school attendance and completion.¹²²

144. Interlocutors welcomed the 2023 Traveller history and culture research report as it provides an overview of the different aspects of Traveller culture and history. However, the action "Publish a resource containing examples of, practice of teaching and learning about Traveller culture and history" did not specify how this resource will be

taught, and there is critical need for teacher training. Traveller culture, values, experiences and interests are not included in the education system. With regard to positive measures, the "Yellow Flag Programme" developed by the Irish Traveller Movement is welcomed by persons belonging to the Traveller community as a means to promote greater understanding and appreciation of cultural diversity in schools.¹²³ Interlocutors from the Roma community pointed out to scarce information in school curricula about their history and culture. There is for instance nothing included about the Roma genocide remembrance (*Porajmos*) and other events in the European history. Cairde also emphasised that greater consideration should be given to the Romani language.¹²⁴

145. The Advisory Committee reiterates that "adequate information on the composition of society, including national and other minorities, form part of the public curriculum and of textbooks and education materials used in all schools throughout the territories of states parties,"¹²⁵ not only to promote intercultural understanding and respect among all students, but also to raise the prestige and self-awareness of persons belonging to numerically smaller or socially or economically disadvantaged groups. It underlines that education about national minorities should also include the contributions of individuals belonging to national minorities to various fields, whether in art, music, literature or science, as part of an integrated and inclusive curriculum. It is also important to "present notable histories of minority individuals who have contributed prominently to the development of the contemporary state, including minority women."¹²⁶ The Advisory Committee also emphasises the linkage between intercultural education, the perceived value of minority cultures within schools, drop-out rates, and that measures to boost intercultural education – giving minority pupils and students a visibility in the curriculum and in the school – can also have a positive effect on reducing drop-outs and improving attendance rates of minority pupils and

¹²⁰ See also Strategic Action 1.5 included in the [Traveller and Roma Education Strategy \(TRES\) Plan for implementation and action 2024-2026](#). This Strategic Action builds upon the NCCA's Audit of Traveller Culture and History in the Curriculum from 2019 and the NCCA Traveller Culture and History report from 2023.

¹²¹ See the recent [report on the number of Traveller children attending DEIS \(Delivering Equality of Opportunity in Schools\) primary and post primary schools](#). In terms of published figures, the "[Pupils from the Traveller Community 2016-2020](#)" report (p. 4) by the Department of Education outlines the use of a refined DEIS identification model. This model includes data on students who self-identified as Travellers or Roma. According to the report, for the 2022/2023 academic year, 71.9% of Traveller pupils were enrolled in DEIS primary schools. The report further details that the refined model has also impacted the distribution of Traveller pupils in DEIS post-primary schools, increasing their representation to 55% for the 2022/2023 academic year.

¹²² See the [fifth state report](#), pp. 24-25.

¹²³ See the [Yellow Flag Programme](#).

¹²⁴ See Appendix I of the [fifth state report](#), p. 70.

¹²⁵ See [ACFC Thematic Commentary No. 1 on Education \(2024\)](#), para. 18.

¹²⁶ See [ACFC Thematic Commentary No. 1 on Education \(2024\)](#), para. 37.

students, including through tackling bullying on the basis of ethnicity.

146. The Advisory Committee is concerned about the scarce information regarding both Travellers and Roma communities and persons belonging to them in schools and curricula. It considers that the provision of adequate intercultural education is extremely important. The Advisory Committee welcomes the 2023 Traveller history and culture research report which identifies the state of play of different aspects of Traveller culture and history in the school curriculum. It considers that care should be taken to ensure that the problems identified in the NCCA assessment report are considered by the authorities with the involvement of persons belonging to the Traveller community. Teaching about the substance and purpose of minority rights in the general human rights education as an integrated part of human rights protection is also of utmost importance. Moreover, it is essential that all teachers be adequately trained to promote respect for different ethnic, cultural and linguistic identities and to promote inclusion and dialogue in the classroom and throughout regular school practices, including in extracurricular activities. The Advisory Committee also reminds the authorities of the Council of Europe Committee of Ministers Recommendation CM/Rec(2020)2 on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials¹²⁷ and emphasises the importance of its implementation.

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.

Effective participation in public life (Article 15)

148. The participation of persons belonging to the Traveller community in public life is extremely low in Ireland. The first ever special measure to ensure Traveller representation in the Irish

political system was taken in 2020 when the Prime Minister (the *Taoiseach*) appointed a Traveller woman to the Upper House (the *Seanad*) of the national Parliament (the *Oireachtas*).¹²⁸ This appointment was a step in the right direction as she chaired a number of important meetings.¹²⁹ For example, in April 2024 a session of the Committee on Key Issues Affecting the Traveller Community was held in the *Seanad*, which was attended by many representatives of the Traveller community and was hailed as “a historic occasion, an important occasion” by the *Cathaoirleach* (Speaker) of the *Seanad*.¹³⁰ In 2021, the National Traveller Women's Forum (NTWF) project entitled “Traveller Women for Election – Changing the Face of Irish Politics” was implemented with the aim of encouraging Traveller women to participate in political life and engaging political parties in delivering a Traveller cultural awareness and anti-racism programme. The report entitled “Different Paths, Shared Experiences: Ethnic Minority Women and Local Politics in Ireland” was published in March 2022.¹³¹ This has led to the recruitment of a Political Support Worker in June 2023 promoting political participation and advocacy.

149. The Advisory Committee has not received any information on local councillors belonging to the Traveller community. However, there are some rare examples of Traveller women representation in public life and several national policy committees include Traveller representatives. Actions 75 and 76 of the Action Plan for 2024-2026 of the NTRIS II envisage some measures to increase the number of people with a Traveller and Roma ethnic affiliation, including Traveller and Roma women, who put themselves forward for election as local councillors, senators or members of *Dáil Éireann* (TDs).¹³² The Council of State¹³³ also includes a Traveller woman. Beyond this, commitments by Ireland have not materialised into measures to improve the representation of Travellers, including women, in political institutions and decision making.¹³⁴ The 2012 Electoral (Amendment) (Political Funding) Act saw the introduction of gender quotas to national politics;

¹²⁷ Council of Europe [Recommendation CM/Rec\(2020\)2](#) to member States on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials, adopted by the Committee of Ministers on 1 July 2020.

¹²⁸ Initiatives are currently supported in voter education and registration in the Traveller community.

¹²⁹ See the [Final Report of the Joint Committee on Key Issues Affecting the Traveller Community](#), November 2023.

¹³⁰ See RTÉ article, [Travellers systematically denied adequate accommodation](#), 18 April 2024.

¹³¹ National Traveller Women's Forum, AkiDwA, Maynooth University, [Different Paths, Shared Experiences: Ethnic Minority Women and Local Politics in Ireland](#), 2022.

¹³² Actions 75 and 76 of “Theme 9: Participation, Empowerment, Cooperation and Accountability” of the [Action Plan for 2024-2026](#) of the National Traveller and Roma Inclusion Strategy (NTRIS II), pp. 103-104, 31 July 2024.

¹³³ This is a body which the President of Ireland consults in matters specified in the Constitution.

¹³⁴ Some initiatives are currently supported in voter education and registration in the Traveller community.

however, no such quota has been introduced for the Traveller community, ethnic minorities or women representing minority groups. However, in 2024, the *Taoiseach* participated, along with leaders of all the main political parties, in a video campaign to promote voter registration among persons belonging to the Traveller community¹³⁵ and highlighted the importance of having their voices heard during elections.

150. Traveller organisations considered it commendable to have a Traveller woman appointed in the *Seanad* and a positive signal provided by the *Taoiseach*. The Advisory Committee shares this point of view. However, the appointment highlights the broader issue of the alarmingly low participation and exclusion of Travellers in Irish public life. The Advisory Committee would encourage the *Taoiseach* to identify one of the eleven nominees as a Traveller seat on an ongoing basis. Possible candidates could be nominated by the Traveller community. However, in the longer term, the ideal would be to have a Traveller panel similar to the other five panels,¹³⁶ where the candidate would be elected by the Traveller community. One of the positive measures supporting the participation of Travellers, including women, in public life, and at the local level, is the annual funding to the NTWF to support Traveller women in taking leadership roles within their own and the wider community by providing training both for Traveller women and for elected officials. It was also reported that participation of persons belonging to the Roma community in Ireland's public life is unsatisfactory. For example, only one Roma organisation participates in the NTRIS sub-committee on education and employment.

151. The Advisory Committee reiterates that "[t]he degree of participation of persons belonging to national minorities in all spheres of life can be considered as one of the indicators of the level of pluralism and democracy of a society."¹³⁷ The involvement of representatives of national minorities in decision-making should encompass a wide range of areas, including those not exclusively or directly concerning minority issues. Furthermore, minority participation should reflect diversity within communities.

152. The Advisory Committee underlines that no special measures have been introduced to

ensure Traveller and Roma inclusion – regardless of their gender – in local politics, despite calls by numerous human rights monitoring bodies to address the significant exclusion of persons belonging to Traveller and Roma communities from decision making and wider political processes at local and national levels. The Advisory Committee is of the view that the appointment of a Traveller woman in the *Seanad* is a positive sign; however, this choice should be made permanent and reflection should be conducted to have a dedicated seat in the *Seanad* specifically designated for Travellers so as to guarantee that they would have a voice in the decision-making process and provide a platform for their perspectives to be heard and valued. The Advisory Committee is also concerned that only one Roma organisation participates in the NTRIS sub-committees on education and employment, which is not enough. Efforts are needed by the authorities to secure more active participation of persons belonging to Traveller and Roma communities in Ireland's public life.

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*.

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.

Effective participation in socio-economic life: access to employment and social protection (Article 15)

155. In 2022, based on the census data, the unemployment rate for persons belonging to the Traveller community (61%) fell by 19 percentage points, down from 80% in 2016. There were 15% of persons belonging to the Traveller community who reported experiencing at least one long-lasting condition or difficulty to a great extent or a lot compared with 8% of all people living in Ireland.¹³⁸ However, the above figures have been questioned by some Travellers since, from their

¹³⁵ See [video campaign to encourage Travellers to vote in elections](#), 2024.

¹³⁶ Culture and education panel, agriculture and fisheries panel, labour panel, industrial and commercial panel, and administrative panel.

¹³⁷ See [ACFC Thematic Commentary No. 2](#), The effective participation of persons belonging to national minorities in cultural, social and economic life and in public affairs, adopted on 27 February 2008, para. 8.

¹³⁸ CSO, [Census 2022 Profile 5 - Diversity, Migration, Ethnicity, Irish Travellers & Religion](#), October 2023.

perspective, the unemployment rate among the Travellers is still around 80%. Also, persons belonging to the Traveller community are ten times more likely to experience discrimination in seeking work.¹³⁹

156. Historically, the majority of persons belonging to the Traveller community were self-employed in the 'Traveller economy'¹⁴⁰ and therefore they required little assistance from the state for decades. The Traveller economy differed from the settled economy because it relied on nomadism and was based on self-sufficiency and flexibility. Traditional forms of employment included craftsmen, tinsmiths, horse traders, entertainers (musicians, singers and storytellers), seasonal labourers, seasonal potato pickers and door to door traders. Persons belonging to the Traveller community are also well known for their recycling endeavours through scrap collecting and selling second hand goods in the markets. Market trading, scrap collecting, and horse-fairs have collapsed due to restrictive legislation and local bylaws. There are a few viable enterprises being run by Travellers throughout the country, mainly in recycling and knitting. Travellers are involved in mattress recycling,¹⁴¹ retrofitting houses and scrapping cars. Currently, there is a crisis in Traveller horse ownership in Ireland. While legislation regulating the ownership of horses has been introduced, there is little acknowledgement of the cultural significance of horses to persons belonging to the Traveller community.¹⁴²

157. Due to problems with data collection and the reluctance of some to self-identify under the new 2022 census provisions, persons belonging to the Roma community tend to be invisible in the labour

market.¹⁴³ Those who came to Ireland to find work complained about low paid jobs and work conditions in factories. Those who reported being unsuccessful in their applications had on average lived in Ireland for years and cited obstacles to access employment such as poor level of language proficiency and literacy, lack of IT literacy, social determinants of health, as well as the lack of appropriate transport and childcare support for Roma women in particular.¹⁴⁴ They also reported about issues such as a lack of documentation on tenancy and employment history and inability to negotiate as being key obstacles in this regard. Therefore, activities of the South Dublin County Partnership for the inclusion of the Roma community in Tallaght Mountain Park are highly important and deserve to be further promoted, in particular the Roma women's sewing club and the work carried out by Roma health and housing workers in terms of support for housing, social welfare, employment and homelessness.¹⁴⁵ Roma representatives also suggested that each county in Ireland should have a department community officer on social protection to help advance their files.

158. Interlocutors also expressed concerns regarding delays in the development of a Traveller and Roma Training, Employment and Enterprise Plan.¹⁴⁶ Research from 2021 highlighted challenges in undertaking quantitative research on Traveller experiences of in-work discrimination, due to high levels of unemployment resulting in a small sample size. Ethnic minority women are more likely to be on

¹³⁹ BBC article, [Irish Travellers 'mental health crisis' driven by discrimination and deprivation](#), 18 April 2022.

¹⁴⁰ The 'Traveller economy' refers to the traditional economic activities that Travellers engage in, which "is 'outside' dominant or 'mainstream' economic activity that is based on sedentary modes of production", National Council for Curriculum and Assessment, [Traveller culture and history research report](#), 2023, p. 21.

¹⁴¹ A Traveller-led mattress enterprise in Galway is regarded by many interlocutors as a good practice.

¹⁴² According to a 2018 report by Pavee Point Traveller and Roma Centre, legal requirements relating to horse ownership are costly. There is no access to land and there is a lack of culturally appropriate and accessible information.

¹⁴³ According to Chapter 7 Employment and Social Protection in [Roma in Ireland – a National Needs Assessment](#) from 2018, 20% of Roma in Ireland are living in 'extreme' poverty and many are unable to access basic social protection. 78.9% of Roma feel discriminated against in getting a job; only 16.7% of Roma are employed and 84.4% reported feeling discriminated against in getting social welfare, regardless of the success of their application.

¹⁴⁴ Pavee Point Traveller and Roma centre, [Roma in Ireland: Access to Faire and Decent Work](#), 2023.

¹⁴⁵ The Roma Women's Sewing Club in Tallaght received €3 000 from the Department of Health for seven Roma women. See also the Report by South Dublin County Partnership Roma Housing and Health Worker, January-December 2022, by the Roma Housing and Health Worker covering the situation of 231 Romanian Roma in Tallaght and nearby municipalities. Problems raised for housing and social welfare support included language and literacy competences, unaffordable rents, overcrowding, lack of proof of 52 weeks employment summary, no PPS numbers, lack of accommodation for larger families, poor living conditions, lack of digital skills, etc.

¹⁴⁶ IHREC, [Submission to the public consultation on the mid-term review of the Pathways to Work Strategy 2021-2025](#), 2023, pp. 7-8. According to action 33 of the [Action Plan for 2024-2026](#) of the [NTRIS II](#), the Traveller and Roma Training, Employment and Enterprise Plan is expected to be completed by end 2026.

temporary contracts and to have unreliable shift work and insecure terms of employment.¹⁴⁷

159. Child benefit is allocated to persons who live in Ireland and satisfy the Habitual Residence Condition (HRC).¹⁴⁸ The IHREC has identified that the application of the HRC to child benefit affects particularly children with migrant, Roma and Traveller affiliations. Roma who do not have the right to reside or HRC are not considered job seekers and therefore are not eligible for many forms of training and employment support. Many Roma are unable to obtain social protection payments due to the way the European Directive 2004/38 on the freedom of movement and residence is implemented. In the Irish context, this requires applicants to meet the HRC. The Roma Needs Assessment found that 49.2% of households with children were unsuccessful in their application for social protection payments, and therefore were not receiving child benefit or other crucial types of support.

160. The unemployment rate for Travellers is still high. The authorities certainly should be much more ambitious on how to create jobs for the Traveller community. Therefore, the Advisory Committee is pleased that “Theme 5: Employment and Enterprise” is a key theme under the NTRIS II.¹⁴⁹ The Advisory Committee considers it worthwhile for the public sector to support the Traveller economy, including the entrepreneurship and Traveller-led social enterprises (recycling, restaurant, horse market, etc.). The model of social enterprises is positive to bring together Travellers’ experience, and by doing this, they do not feel discriminated when entering the labour market. There is a need for the development of a national Traveller and Roma employment strategy. Persons belonging to the Traveller community should be granted a job opportunity at their current level of education, and then be granted further training and access to promotion afterwards. The Advisory Committee is of the view that measures should

be instituted to promote inclusivity in the labour market. These can include employer incentives, public-private partnerships, fiscal policies such as increased government spending or corporate tax breaks, and the reasonable accommodation of persons with special needs in the workplace.”¹⁵⁰ The Advisory Committee further considers that child benefit is a universal payment that should not be contingent on the fulfilment of the HRC so as to ensure Roma children residing in the state are eligible for child benefit payments regardless of the legal or administrative status of their parents.

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.

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.

Effective participation in socio-economic life: access to healthcare (Article 15)

163. Travellers and Roma face stark health inequalities compared with the majority population, worsened further by the Covid-19 pandemic. According to the 2022 Census, 4% of persons belonging to the Traveller community reported their health as bad or very bad, which is twice as high as the proportion of the total population (2%), whereas 17% of them did not respond to the question.¹⁵¹ According to the Final Report of the Joint Committee on Key Issues Affecting the Traveller Community,¹⁵² the mortality rate among the Traveller men is four

¹⁴⁷ Frances McGinnity, Helen Russell, Ivan Privalko and Shannen Enright, [Monitoring Decent Work in Ireland](#), 2021, pp. 22 and 99.

¹⁴⁸ See the [Habitual Residence Condition \(HRC\)](#). Child Benefit is a monthly payment of €140 for each child to the parents or guardians of children under 16 years of age, or for children aged 16 and 17, if they are in full-time education or full-time training, or have a disability and cannot support themselves. From 1 May 2024, child benefit will be extended to children aged 18 who are in full-time education or who have a disability.

¹⁴⁹ The [Action Plan for 2024-2026](#) of the [NTRIS II](#) incorporates a series of concrete measures aimed at improving Traveller employment outcomes. One of the measures listed is Action 33 is: “Develop and implement a Traveller and Roma Training, Employment and Enterprise Plan to support, and build upon, the delivery of the strategic outcome and objectives of NTRIS II in the area of employment and enterprise.”

¹⁵⁰ See [OSCE HCNM Recommendations on effective Participation of National Minorities in Social and Economic Life & Explanatory Note](#), October 2023, Recommendation 20, p. 47.

¹⁵¹ CSO, [Census of Population 2022 - Summary Results](#), 2023, and [Final Report of the Joint Committee on Key Issues Affecting the Traveller Community](#), November 2021.

¹⁵² See [Final Report of the Joint Committee on Key Issues Affecting the Traveller Community](#), November 2021, pp. 11 and 24.

times higher than that for the population as a whole, while for Traveller women it is three times higher. Traveller men tend to die on average at least 15 years younger than their settled Irish male peers while Traveller women die approximately 11.5 years younger than their peers. Severe problems on mental health and the very high suicidal rate of 11% amongst Travellers (which is almost seven times higher than amongst the general population) are key issues impacting the Traveller community. Traveller children are also impacted by suicide¹⁵³ and the infant mortality rate for Traveller children is 3.6 times the rate for the general population. Poor education outcomes, discrimination and poverty contribute to poor mental health amongst Travellers.

164. Persons belonging to the Roma community face barriers, such as an absence of sustainable funding for a Roma health infrastructure, as well as a lack of access to medical cards, interpretation and translation facilities. Those Roma without financial means continue to be denied access to medical and healthcare benefits due to restrictions imposed by statutory regulations.¹⁵⁴ As a result of Covid-19 pandemic and the recognition of the urgent need to address Roma health inequalities, a positive development was the allocation of funding for health-workers working with Roma. Cairde's National Roma Infoline was established in March 2020 to respond to Roma health needs in Ireland¹⁵⁵ and to address the disproportionate impact of the Covid-19 pandemic on Roma. As of December 2023, the Infoline has responded to close to

10 000 calls from Roma and service providers around the country.¹⁵⁶

165. Women from "structurally vulnerable groups"¹⁵⁷ face particular challenges. There is concern about the poor mental health outcomes of Travellers, including Traveller women and children.¹⁵⁸ Furthermore, the discriminatory effect of the health system on women from "structurally vulnerable groups" is particularly acute in relation to maternal health services. Data evidence signify disparities in perinatal mortality rates for ethnic minority women and migrant women.¹⁵⁹ Expectant mothers from Roma communities face barriers at all stages, including lack of access to free maternal healthcare and primary healthcare and medical cards. Although maternal healthcare is free to pregnant women who are resident in Ireland, Roma women report being asked to pay for services if they cannot provide a proof of employment or address. About 40% of Roma women do not have a general practitioner and 50% do not have a medical card. Inconsistent post-natal care, limited culturally appropriate information,¹⁶⁰ as well as racism and discrimination¹⁶¹ are mentioned as root causes for this situation.

166. The National Traveller Health Action Plan (NTHAP)¹⁶² launched in November 2022, is the first policy document that has a specific focus on Traveller health since the National Traveller Health Strategy 2002-2005. The NTHAP is regarded as a positive and ambitious step given the significant health issues amongst persons belonging to the Traveller community. However, the Action Plan requires ongoing funding. It was reported that the 2023 budgetary commitment of

¹⁵³ Exchange House Ireland found, from January to March 2023, six suicides in Traveller community, including two children, both aged 14 years.

¹⁵⁴ The impacts were noted in the findings of [Roma in Ireland – a National Needs Assessment](#), with 50% of respondents reporting that they did not have a medical card.

¹⁵⁵ Cairde is a community development organisation working to tackle health inequalities among ethnic minority communities by improving access to health services and minority participation in health planning and delivery.

¹⁵⁶ Cairde's [2023 Annual Report on the Infoline](#). Two thirds of the calls (66%) to the Infoline were made from or on behalf of Roma with no medical card and no general practitioner. The Infoline received 521 calls involving health queries, including providing information on Covid-19, children's health, maternal health, mental health, organising prescriptions, and supporting clients to apply for a medical card.

¹⁵⁷ IHREC defines a "structurally vulnerable person" as someone who is particularly vulnerable to violations of their rights due to political, economic, social and cultural structures. Instead of focusing on the personal characteristics of individuals and groups and viewing them as lacking agency, 'structural vulnerability' refers to the structures in place which render certain sectors of the population particularly vulnerable to human rights abuses, IHREC, [The Incorporation of Economic, Social and Cultural Rights into the Irish Constitution](#), February 2023, p. 2, footnote 7.

¹⁵⁸ IHREC, [Ireland and the Convention on the Elimination of All Forms of Discrimination against Women: Submission to the Committee on the Elimination of Discrimination against Women for the List of Issues Prior to Reporting on Ireland's 8th periodic cycle](#), 2023. See also IHREC, [Ireland and the Rights of the Child](#), 2022, p. 77.

¹⁵⁹ ESRI, [The Integration of Non-EU Migrant Women in Ireland](#), 2022, pp. 20-21.

¹⁶⁰ Roma women noted the lack of clear information on making appointments, staying healthy in pregnancy and breastfeeding, as well as limited access to interpretation services.

¹⁶¹ Pavee Point Traveller and Roma Centre, [Le Romneango Sfato. Roma women's voice: experiences of maternal health services in Ireland](#), 2023, pp. 7, 10, 11, 12, 18 and 19.

¹⁶² [National Traveller Health Action Plan 2022-2027](#), November 2022.

€1.3 million is planned as a recurring investment towards implementation of the NTHAP. Peer-led services have an important role in addressing Traveller health inequalities. The 27 Primary Health Care for Travellers Projects (PHCTP) across Ireland, focusing on providing primary healthcare to persons affiliating with the Traveller community, under the remit of seven Traveller Health Units, have had a positive impact on the physical and mental health of the Travellers.¹⁶³

167. A Traveller Mental Health Working Group¹⁶⁴ ensures that the high-level mental health actions from the NTHAP are aligned with and inform other mental health policies and operational plans. This group also plans and develops services towards the ringfenced €365 000 in 2022 allocated to Traveller mental health from the Department of Health. Further funding of €55 000 was awarded in 2022 for a peer-led research project to develop a Traveller mental wellness continuum framework. In addition, the National Office for Suicide Prevention provides annual funding for a Traveller mental health service. The mental health of Traveller children is also a priority. The HSE programmes to address mental health issues for young Travellers in the NTHAP are actioned, but the crisis is outpacing the critical demand and incidence of mental health issues. According to the Traveller Mental Health Working Group, a national dedicated cost centre to monitor and track allocation and expenditure needs to be developed.

168. In November 2022, the HSE Community Healthcare Organisations CHO2 (Galway, Mayo, Roscommon) and CHO4 (Cork, Kerry) were continuing to promote and recruit members of the Traveller community to deliver Youth Mental Health First Aid. The website Young Pavees 'Mind Your Nuck',¹⁶⁵ launched in 2022, is an innovative platform that offers culturally appropriate information on many areas impacting on young Travellers' mental health. In March 2023, a new Roma Mental Health and Wellbeing working group was established for Roma and Roma health workers.¹⁶⁶

169. Commending the authorities for all their efforts, the Advisory Committee remains concerned about the overall healthcare situation

of the Travellers and Roma. It recognises the connection of this issue with others – notably housing and employment. The Advisory Committee welcomes Traveller PHCTPs, but all Traveller Community Health Workers (TCHW) in those PHCTPs, mainly women, should be automatically and with no exceptions issued medical cards. Health services need to be provided in an inclusive and culturally appropriate and sensitive way. It further considers that non-discriminatory access to health care, including sexual and reproductive health services for Travellers and Roma women and girls, is needed. Moreover, mental healthcare situation of Travellers is also concerning. The Advisory Committee hopes that some of these measures will address racist attitudes against Travellers in the Irish society, which is one of the root causes of Travellers' mental health problems, including drug addiction.¹⁶⁷ In light of the lack of data, the Advisory Committee refers here to its findings and conclusions under Article 4. The Advisory Committee also considers that there is an urgent need for an "ethnic identifier" – now included in the NTHAP – and health indicators to be developed to monitor and identify Travellers' access, participation and outcomes in health and healthcare. The Advisory Committee further considers that the implementation of ethnic equality monitoring, including the use of a standardised "ethnic identifier" – consistent with national census and inclusive of Roma – is also needed.

170. Commending the authorities for the provision of funding for health-workers working with persons belonging to the Roma community, the Advisory Committee considers that this model needs to be put in place across the country. There is a need for Traveller and Roma cultural awareness training amongst local health and mental health service providers addressing literacy, access to information, cultural gender expectations, such as women wanting to be treated by a female doctor, and related cultural awareness. Lastly, the Advisory Committee welcomes the inclusion of mental health support in the NTHAP. It regrets, however, that the National Traveller and Roma Mental Health Action Plan, as promised by the authorities, was

¹⁶³ The Traveller Primary Health care Projects fall within the Health Service Executive Community Health Organisation boundaries and are funded via the Community Health Organisation structures.

¹⁶⁴ Composed of representatives from HSE Mental Health, National Office for Suicide Prevention, Engagement & Recovery and Social Inclusion, along with members from Traveller organisations' providing mental health supports.

¹⁶⁵ [Young Pavees 'Mind Your Nuck'](#). The website was developed in partnership with Travellers and the HSE. [Videos](#) highlight how the Young Pavees 'Mind Your Nuck' website can be used by both young Travellers and their families.

¹⁶⁶ See [webpage on Travellers and Roma](#) from the National Social Inclusion Office.

¹⁶⁷ The Department of Health and the HSE recognise the acute health issues faced within the Traveller community with regards to drug use, and the associated harms. While their National Drug Survey or National Drug Related Death Index does not collect data on Traveller or Roma use currently, the National Drug Treatment Reporting System does collect information on the socio-demographic characteristics of cases treated for drugs as a main problem, which includes those from the Traveller community. While there has been a significant increase across all ethnicities of people receiving treatment for cocaine, this is particularly so for the Traveller community. See additional replies from the Irish Government, 23 October 2023.

not yet implemented to address suicides and the mental health crisis the Traveller community is experiencing.

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.

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.

Effective participation in socio-economic life: access to accommodation and housing (Article 15)

173. The Traveller community is significantly over-represented in the population experiencing homelessness with 22% of them more likely to be affected by the homelessness crisis. In 2022, 77% of calls to the National Roma Infoline were from or on behalf of Roma who were experiencing homelessness.¹⁶⁸ All homelessness has severe negative consequences for physical and mental health and for the education of children. A 2021 report on Travellers and homelessness found that many persons belonging to the Traveller community are in “hidden homeless” situations. The report found that 39% of Travellers lived with extended family in overcrowded accommodation.¹⁶⁹ According to a national survey by 27 local authorities, persons belonging to the Traveller community make up at least 8% of adults experiencing homelessness staying in emergency accommodation and 12% of homeless children. In exchanges with the Advisory Committee, local authorities suggested that these figures were likely to be an underestimate as some individuals will not

identify themselves as Travellers. Furthermore, according to Traveller interlocutors, the current definition of homelessness provided by the state excludes many of those persons belonging to the Traveller community, who live in overcrowded and temporary accommodation.¹⁷⁰

174. Another problem concerns the living conditions. Most halting sites are situated near environmental hazards such as electricity pylons and dumps. Some halting sites lack running water and adequate electricity support and have inadequate sanitation facilities or lack such facilities altogether. Where Travellers are provided with sanitation facilities, some of these facilities are designed as a short-term measure and are of a poor quality. Conditions are frequently linked by the residents to ongoing medical issues and other impacts on family life and the education of children. Many reside in these conditions for a long period of time, in some cases for decades.¹⁷¹ The slow progress in providing Traveller culturally appropriate accommodation has also been attributed to opposition by the locally settled population. Traveller organisations considered that institutional racism in the local authorities has played an important part as well, combined with reluctance to fully use their planning powers. In certain areas in Finglas, on the outskirts of Dublin, ambulance drivers refuse to enter into the halting site and/or barriers are erected by local authorities at entry points of halting sites so that ambulances cannot gain entry and reach the caravans. As a result, sick or persons with disabilities have to walk to the main street to be taken in charge. Persons belonging to the Traveller community in the visited Carrowbrowne temporary and transient sites in a Galway suburb also complained that they have to leave the place during summer because of the smell of nearby garbage dumps. The Advisory Committee also noted a lack of fire alarms and equipment and barriers at the entrance, preventing firemen or ambulances from reaching the mobile homes or caravans. The Advisory Committee was informed by the Galway City Council that several projects had been rejected by the authorities due to environmental concerns by the Urban Planning Authority, e.g. no bus connection between the

¹⁶⁸ See Cairde's [2023 Annual Report on the Infoline](#).

¹⁶⁹ Pavee Point Traveller and Roma Centre, [The Traveller Community and Homelessness](#), 2021.

¹⁷⁰ As per 2022 census, 29 900 Travellers were living in private households, the majority living in permanent housing, while 2 286 people (8%) were living in temporary housing units, such as caravans and mobile homes ([Irish Travellers – Central Statistics Office](#)). In Fingal, 18% of Travellers were living in temporary accommodation, the highest proportion in the country.

¹⁷¹ For further information, see IHREC, [Comments on Ireland's 20th National Report on the Evaluation of the European Social Charter](#), 2023, pp. 13-15.

planned area and the city centre, obliging residents to use their cars.¹⁷²

175. As regards persons belonging to the Roma community, they face discrimination in accessing housing and accommodation, severe overcrowding, poor living conditions, a possible lack of security of tenure,¹⁷³ homelessness and barriers in accessing social housing and rent supplement. 46% of Roma in Ireland reported experiencing homelessness at some stage in their lives.¹⁷⁴ The fact that persons belonging to the Roma community cannot provide a rental certificate or a housing proof prevent them from accessing basic services, such as obtaining health certificates, entitlement to social benefits or access to training programmes. There is a state commitment to include Roma specific housing actions in the NTRIS, but no actions have been developed. There is a lack of clear targets, indicators, timelines and adequate resources, and of an assigned person to ensure its implementation. Furthermore, there is no collaboration between all relevant stakeholders, including Roma representatives and organisations working with Roma.

176. Based on the work of the Programme Board in charge of implementing recommendations of the Traveller Accommodation Expert Review report, a sub-group of the board, which include a Traveller organisation representative, was created to develop guidance on the eviction procedure by local authorities. Trespass is a civil wrong under Irish law, and for the most part is addressed by means of a civil remedy. Trespass may be dealt with under criminal law in certain circumstances, and a range of offences are provided for in legislation. There are currently no plans to change the law in this regard, but the situation is kept under review (see Article 4 above).

177. The Advisory Committee reiterates that “substandard housing conditions, often coupled with the physical/spatial separation of persons belonging to certain national minorities, in particular Roma and Travellers, considerably affect their ability to participate in socio-economic life and can result in their further poverty, marginalisation and social exclusion. This is frequently made more acute by the lack of legal provisions securing their residency rights and by their vulnerability to forced evictions.”¹⁷⁵ Many

halting sites for Travellers are still situated in environmentally hazardous and unhealthy areas. It finds it alarming that some temporary and transient sites, like Carrowbrowne, are lacking fire alarms and equipment or have barriers at the entrance that are preventing even firemen or ambulances from reaching the mobile homes or caravans. Access to basic infrastructure and adequate living conditions need to be ensured urgently, including access to sanitation and electricity in or in the immediate vicinity of their settlements. The Advisory Committee, whilst understanding the environmental concerns and the need to move to a greener economy put forward by the authorities to address environmental concerns, is of the view that priority should be given to the improvement of the accommodation situation of persons who have been living in hazardous and poor accommodation sometimes for decades leading to poor health status, stigmatisation and difficulties to access employment and public services.

178. In this light, the Advisory Committee considers that inadequate accommodation and housing conditions of both Travellers and Roma demand concrete, systemic and comprehensive actions by the authorities at all levels, in particular as part of the development of housing policies to address social inequalities and ensure adequate living conditions for persons belonging to the Travellers and Roma communities. Poor accommodation has a detrimental effect on Travellers and Roma and poses an immediate and serious threat to their lives. Safety of sites, in particular unofficial and/or temporary sites, such as in Carrowbrowne temporary and transient sites, is of a paramount importance. Resolute measures for the legalisation of existing informal Roma settlements are needed along with the necessity to improve access to social housing in line with the principles included in Recommendation Rec (2005)4 of the Council of Europe Committee of Ministers “on improving the housing conditions of Roma and Travellers in Europe.”¹⁷⁶

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

¹⁷² Planning permission was also refused for the wider social housing development on the basis of transport issues.

¹⁷³ The law governing [security of tenure](#) indicates that “after 6 months living in a tenancy, the tenant will have a right to remain in the property for an unlimited duration. Tenancies that existed prior to 11 June 2022 will convert to Tenancies of Unlimited Duration at the end of the current 6-year cycle. A landlord still has the right to end a Tenancy of Unlimited Duration under the specific reasons for ending a tenancy as set out in the Residential Tenancies Act.” This seems to be the case for tenants belonging to the Roma community.

¹⁷⁴ See [Roma in Ireland – a National Needs Assessment](#), 2018.

¹⁷⁵ See [ACFC Thematic Commentary No. 2](#), para. 57.

¹⁷⁶ [Recommendation Rec\(2005\)4 of the Committee of Ministers to member States on improving the housing conditions of Roma and Travellers in Europe](#), adopted by the Committee of Ministers on 23 February 2005.

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.

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.

The Advisory Committee on the Framework Convention for the Protection of National Minorities is an independent body that assists the Committee of Ministers of the Council of Europe in evaluating the adequacy of the measures taken by the Parties to the Framework Convention to give effect to the principles set out therein.

The Framework Convention for the Protection of National Minorities, adopted by the Committee of Ministers of the Council of Europe on 10 November 1994 and entered into force on 1 February 1998, sets out principles to be respected as well as goals to be achieved by the states, in order to ensure the protection of national minorities. The text of the Framework Convention is available in English and French, as well as in Romani among other languages.

This opinion contains the evaluation of the Advisory Committee following its 5th country visit to Ireland.

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