

Comments of the Government of Ireland on the Council of Europe's Commissioner for Human Rights Recommendations in the 'Memorandum on the Human Rights of Travellers and Roma in Ireland'

19 February 2025

I. General situation

The Government of Ireland recognises the very important role played by the Council of Europe Commissioner for Human Rights in upholding human rights across Europe.

Ireland thanks Commissioner O’Flaherty for his constructive report on his visit to Ireland in October 2024, ‘Memorandum on the Human Rights of Travellers and Roma in Ireland’, and for his kind acknowledgement of the cooperation received during his visit. Ireland affirms that the recommendations made by the Commissioner regarding the human rights issues faced by Travellers and Roma in Ireland will be given careful attention by the Irish authorities.

The Government of Ireland welcomes the recognition given by the Commissioner to the important steps that have been taken by the Irish authorities in recent years to develop and adopt ambitious and forward-looking strategies and action plans that are aimed at a more effective protection of the rights of Travellers and Roma, including:

- the National Traveller and Roma Inclusion Strategy II 2024 – 2028 (NTRIS II), launched in July 2024;
- the National Action Plan Against Racism 2023 – 2027 (NAPAR), launched in March 2023;
- the National Traveller Health Action Plan 2022 – 2027 (NTHAP), launched in November 2022; and
- the National Traveller and Roma Education Strategy 2024–2030 (NTRES), launched in July 2024.

The Irish Government looks forward to continued cooperation and constructive dialogue with the Commissioner for Human Rights in the future, both in relation to the human rights of Travellers and Roma in Ireland, and in relation to the other matters that come within the remit of his Office.

Ireland would like to take this opportunity to make the following observations. The comments refer to individual passages in the Commissioner’s Memorandum; the numbering corresponds to the numbering of the relevant sections and paragraphs of the Memorandum.

II. Anti-Traveller racism and antigypsyism in the criminal and civil justice system

20. The Commissioner recommends that the Irish authorities effectively address over-policing of persons belonging to the Traveller and Roma communities in close consultation with community representatives, including through the establishment of an accessible independent complaints body that operates across the criminal justice system.

21. The authorities should introduce an ethnic identifier throughout the criminal process to ensure that the contributing factors to the over-representation of Travellers in Irish prisons are adequately recognised and addressed.

22. The Commissioner recommends that the authorities strengthen access of Travellers and Roma to support facilities available within the criminal justice system and enhance the use of alternatives to criminal convictions and imprisonment for minor offences.

Ireland is taking a range of measures to address issues faced by Travellers and Roma within the criminal justice system.

The Youth Justice Strategy 2021-2027 recognises that disadvantage and diversity issues underlie the involvement of children and young people within the criminal justice system. The strategy commits to ensuring that Youth Diversion Projects reach all relevant young people in the community, including those from Traveller and Roma communities.

The Department of Justice (DoJ) allocates funding to services for young persons and adults considered vulnerable persons and at risk of involvement in criminal activities. These may include those in the Traveller community susceptible to engagement in such activities due to an underlying lack of family support, education, and job skills, as well as issues concerning substance abuse and poor mental health. These DoJ funded programs aim to target the root causes of criminal behaviour and help individuals successfully transition back into society, reduce the likelihood of recidivism, and address the underlying factors that may contribute to this criminal behaviour.

There are enhanced community-based services for persons in prison and aftercare for persons leaving prison, as well as family supports and targeted interventions for over-represented groups, such as Travellers (both in prison and in Oberstown Children Detention Campus).

Additionally, work to support vulnerable victims continues through the implementation of *Supporting a Victims Journey* (2020). Work in this area includes the establishment of a course at University of Limerick to train intermediaries. The O'Malley Report commits to the introduction of intermediaries whose role is to assist in the communication process, whether between lawyers and witnesses during trial or, earlier, during police interviews.

The DoJ currently funds a model of support for Traveller women in the criminal justice system and their families. This model is operating on a pilot basis for a period of three years and is being delivered by Barnardos, in partnership with the Traveller Justice Initiative (TJI) and the National Traveller Women's Forum (NTWF). Additionally, the Probation Service provides funding to TJI and is proactively involved in their consultative process. This model of support arises from work that the TJI have undertaken on the needs of Traveller women in the criminal justice system and their families, the NTWF's work in delivering peer support for Traveller women in Dóchas prison since April 2017, and wider research undertaken by the Irish Penal Reform Trust. This research has found that an estimated 60% of women in prison suffer from mental health issues. There is also a high rate of drug dependency and domestic violence victims amongst women in prison and a high risk of homelessness upon release.

Barnardos employs a worker to meet these needs, whose functions include, but are not limited to:

- Developing relationships with Traveller women in the criminal justice system to identify their needs as parents.

- Developing individual plans with Traveller women and their families.
- Providing practical supports, which includes coordinating and liaising with a range of criminal justice and community-based services.
- Providing support in building and strengthening individual family and community networks.
- Providing support at each stage of the criminal justice system (pre-sentence, probation, pre-release, and post-release).

The total operational budget is €81,250 per annum for three years of pilot plus €22,000 for evaluation in year 3, resulting in a total budget of €265,750.

Meath Travellers Workshop is currently funded by the Irish Prison Service (IPS) to carry out a Traveller Peer Support initiative which takes place in Wheatfield prison one day per week and has seen positive uptake thus far. The group each week engages 12 participants, and the demand for places is very high. DoJ is soon to engage with Meath Travellers Workshop to examine if this project can be supported to expand to other prisons to support the high number of Travellers currently in the prison system.

Additionally, there are Traveller organisations facilitating further peer support work in Wheatfield, Dochas, Mountjoy, Midlands and Limerick.

The *Review of Policy Options for Prison & Penal Reform 2022-2024*, as approved by Government in August 2022, recognises the growing body of evidence showing that short-term prison sentences are not an effective measure for reducing the risk of reoffending. Accordingly, Priority Action 2 of the accompanying Action Plan aims to develop and expand a range of community-based sanctions for all individuals who come into contact with the criminal justice system, including alternatives to imprisonment. Progress to date includes the following:

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

Additionally, in relation to support facilities available to individuals who come into contact with the criminal justice system, the DoJ chairs the Steering Committee responsible for overseeing the implementation of recommendations made in the Health Needs Assessment for the Irish Prison Service (Crowe, 2022). The Committee published its first progress report in October 2024, providing an overview of progress made in the following areas:

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

A High-Level Taskforce was established to consider the mental health and addiction challenges of people who come into contact with the criminal justice sector. In 2022, the DoJ and the Department of Health jointly published the report and recommendations of the High-Level Taskforce. The recommendations emphasise the shared responsibility of a number of Government Departments and agencies to deliver on meeting the needs of all individuals with mental health and addiction challenges who come into contact with the criminal justice system. The first annual progress report was published in December 2023 and the second is due to be published shortly.

The DoJ supports data collection that provides a greater understanding of groups, including Travellers, who are over-represented in the criminal justice system. The introduction of a unique identifier in the criminal justice system would greatly assist in the development of evidence-based policies to address the factors leading to over-representation, and to support minority populations. The recent Programme for Government 2025, *Securing Ireland’s Future*, plans to introduce a national identification number in the criminal justice system to provide for the compilation of statistics on an anonymised basis.

The IPS records self-declared ethnicity, including Traveller ethnicity, of all persons committed to prison, while the Probation Service provides ethnic data collection training to staff. The training was introduced in 2021 and is integral to new entrants’ on-boarding and induction programmes. The training was co-produced and co-designed in collaboration with key stakeholders for ethnic groups. The Probation Service also provides cultural competency training for all grades of staff, which encourages staff to examine their assumptions and unconscious bias about cultures. The training seeks to enhance awareness of culture and its influence on world views.

Additionally, the Probation Service provides opportunities for enhanced understanding and awareness of ethnic minority groups in Ireland, which includes the Traveller and Roma communities. This is achieved through the ongoing provision of learning initiatives focused on anti-oppressive practice when working with Travelling and Roma communities.

23. The authorities should ensure the effective implementation of the National Action Plan Against Racism (NAPAR) 2023-2027, including by

- ✓ **Amending Section 19 of the Intoxicating Liquor Act to include claims of discrimination by licensed premises under the jurisdiction of the Workplace Relations Committee (WRC).**
- ✓ **Strengthening legal aid schemes to enhance access of Traveller and Roma victims of discrimination in all sectors to effective remedies and complaints mechanisms.**

Ireland's National Action Plan Against Racism 2023–2027 (NAPAR) represents a national level, State-led, co-ordinated approach to eliminating racism in all its forms in Ireland. This includes antisemitism, Islamophobia, racism that impacts the Traveller and Roma people and communities, and racism affecting people of African Descent. Ireland is taking a broad approach to this issue by considering all facets of racism.

The first NAPAR Implementation Report was published in March 2023. The report provides updates on the progress of NAPAR actions across the Government Departments and Agencies identified as implementing bodies. These Departments and Agencies are represented on an interdepartmental co-ordination committee which was established as part of the monitoring and oversight framework. The second implementation report will be published in early 2025.

In addition to NAPAR, the Traveller community is identified as a group requiring special measures in the Third National Strategy on Domestic, Sexual and Gender-based Violence 2022-2026. This strategy recognises the need to reflect the lived experiences of particular cohorts of victims/survivors, including Travellers, and acknowledges the additional risks factors created by overlapping forms of discrimination. Relevant actions in the Strategy include work to increase access by Traveller women to domestic violence refuges, and the establishment of an advisory group, which will include representatives of the Traveller and Roma communities.

In June 2024 the Department of Justice provided feedback to the Department of Children, Equality, Disability, Integration, and Youth in support of their proposal to repeal Section 19 of the Intoxicating Liquor Act 2003 in the General Scheme of the Equality (Miscellaneous Provisions) Bill 2024, which was published in November 2024.

A General Scheme and Heads of Bill arising from a review of Ireland's equality legislation was approved by the then Government in November 2024. This General Scheme proposes the repeal of section 19 of the Intoxicating Liquor Act 2003 and provides for cases of discrimination that occurred on or at the point of entry to licensed premises to be determined by the Workplace Relations Commission under the Equal Status Act, as is the case for other cases of discrimination in the provision of goods and services.

As regards the strengthening of legal aid schemes, in June 2022, the Minister for Justice established the Civil Legal Aid Review Group to review the current operation of the Civil Legal Aid Scheme (which presently provides legal advice and representation to people of limited means in civil disputes) and make recommendations for its future. The membership of the group is drawn from legal practitioners, academics, Department officials, representatives from the Legal Aid Board, which administers the statutory scheme, and, importantly, those who work with marginalised groups such as Travellers and Roma. Amongst the issues the Review Group has been asked to consider in its terms of reference is the scope and types of cases that civil legal aid should cover, including cases dealt with by quasi-judicial fora.

As part of the review, a comprehensive multi-phased process of consultation was conducted to ensure that as wide a range of views as possible is captured. As part of that process, specific focus group meetings with members from both the Traveller community and the Roma community were held to ascertain their views. The Review Group is considering the findings

from this extensive consultation and the research processes that it has undertaken on the existing legal support landscape in Ireland, and how best to meet the civil legal needs of individuals now and in the future. The Review Group is expected to conclude its work in the near future.

III. Access to culturally appropriate accommodation

32. The Commissioner recommends that the Irish authorities ensure access to culturally appropriate accommodation for Travellers and Roma, including by

- ✓ Repealing the 2001 Trespass Act and other provisions that prevent Travellers from practicing their nomadic lifestyle.**
- ✓ Establishing an independent authority mandated to oversee and coordinate the planning and construction of culturally appropriate accommodation at local level.**
- ✓ Ensuring adequate funding and expenditure to address overcrowding and improve living conditions in halting sites.**
- ✓ Increasing the participation of Traveller Accommodation Consultative Committees at local level by enhancing their mandate and powers.**
- ✓ Reviewing the trailer loan scheme in consultation with community representatives to render it more accessible.**

The Programme Board (established to oversee the implementation of the recommendations contained in the 2019 Traveller Accommodation Expert Review report) has established a sub-group to develop a protocol to put in place a consistent approach for local authorities and Traveller households, taking account of the legislation for the removal of temporary dwellings, as introduced in Section 10 of the Housing (Miscellaneous Provisions) Act 1992. Work is advancing through the work of this sub-group. The Department of Housing, Local Government and Heritage publishes updates on its website on ongoing progress by the Programme Board; the most recent report is for October 2024. To date, 14 of the 24 recommendations have been completed. Consideration of governance arrangements is part of the ongoing work programme and is under active consideration by the Programme Board.

Capital funding was fully drawn-down by local authorities over the past 5 years (2020 – 2024), amounting to a capital investment of over €100 million on Traveller-specific accommodation since 2020. Budgetary provision was increased further in 2025 to €23 million capital funding, representing a 59% increase on the 2020 capital budget. This demonstrates a sustainable funding pathway to support continued local authority delivery to address and improve accommodation for Travellers.

The Housing (Traveller Accommodation) Act 1998, which is further supported in its delivery under the *Housing for All* strategy, provides for accommodation measures specifically for the Traveller community, which is in addition to the full range of accommodation supports which are fully accessible to Travellers.

Additionally, the effective operation of Local Traveller Accommodation Consultative Committees (LTACCs) is currently under consideration. The Programme Board has initiated work on a paper on the role of LTACCs. Work on this paper is progressing, which will ultimately assist in addressing and improving the effectiveness of LTACCs.

A Caravan Loan Scheme to enable local authorities to provide preferential loans to Travellers to purchase their own caravans/trailers/mobile homes for occupation on official halting sites for use as their primary residence was introduced in 2025. Details of the new scheme were issued to local authorities in December 2024, to facilitate commencement of the scheme in early 2025.

The new scheme substantially increases the loan limits from €40,000 up to a maximum of €80,000, in certain circumstances (for example, providing accommodation for larger households). The scheme commenced with an allocation of €4 million in capital funding available in 2025 and will allow local authorities to offer preferential, discounted loans for Traveller families to purchase a caravan/trailer/mobile home for use as their primary residence.

33. The authorities should address the increasing homelessness among Travellers and Roma, including by rendering homeless services more accessible to them, introducing appropriate targets and resources in the Housing for all Strategy, and providing adequate safeguards against evictions.

The Department of Housing, Local Government, and Heritage's (DHLGH) role in relation to homelessness involves the provision of a national framework of policy, legislation, and funding to underpin the role of local authorities in addressing homelessness at local level. Statutory responsibility in relation to the provision of accommodation and related services for homeless persons rests with individual local authorities, as do decisions on the assessment of households for homeless services, the most appropriate form of such support, and the allocation of that support.

Separately, the administration of homeless services is organised on a regional basis, with nine administrative regions in place. A homelessness consultative forum has been established in each region, in accordance with Chapter 6 of the Housing (Miscellaneous Provisions) Act, 2009. It is a matter for the management group of the consultative forum to determine the services and the funding required to address homelessness in each region, and to bring forward proposals to DHLGH that meet the needs of homeless individuals in their administrative area. Funding requirements will be considered in this context.

Local authorities and their service delivery partners work closely with all households in need of emergency accommodation to provide appropriate emergency accommodation, and the ultimate aim is to support them to secure an exit to a tenancy. With the increase in social housing stock, local authorities have been requested to ensure that sufficient homes are being allocated to exit households from emergency accommodation.

Budget 2025 has made a record €6 billion in capital funding available to help deliver social, affordable, and cost rental homes. An allocation of €303 million, an increase of €61 million on the 2024 provision, has been made under Budget 2025 to provide homeless prevention services, emergency accommodation and other services for households experiencing homelessness. This is a 25% increase on the 2024 budget allocation. This funding will support the provision of emergency accommodation and supports that households require to exit emergency accommodation to a tenancy. In addition, under Budget 2025, capital funding of €25 million will support the delivery of high quality transitional and emergency accommodation for individuals experiencing homelessness.

The Department will ensure sufficient funding is made available for all required homeless services, including the provision of emergency accommodation, to support those at risk of or experiencing homelessness.

Furthermore, in the Programme for Government 2025, *Securing Ireland's Future*, the Government has reaffirmed Ireland's commitment to working to eradicate homelessness by 2030. The Programme includes distinct actions targeted to reduce and prevent homelessness. These include measures to engage and support rough sleepers with the continued expansion of the Housing First programme, a cross departmental approach to homelessness prevention, the leasing of one-bedroom units to address the immediate needs of single households and a focus on social housing allocations to families who are in long-term homeless accommodation.

The Department will continue to work closely with the National Homeless Action Committee to ensure that there is a continued focus by the various stakeholders on additional measures that can be taken to eradicate homelessness and to support all those experiencing homelessness.

The Equal Status Acts 2000 to 2018, which fall under the remit of the Minister for Children, Disability and Equality, prohibit discrimination in the provision of accommodation on any of the 10 grounds set out below, subject to certain exemptions. Redress is available via the Workplace Relations Commission.

The grounds on which discrimination is outlawed by the Equal Status Acts are:

- gender;
- civil status;
- family status;
- sexual orientation;
- religion;
- age;
- disability;
- race;
- membership of the Traveller community; and
- housing assistance.

The housing assistance ground was provided under the Equality (Miscellaneous Provisions) Act 2015 in connection with the provision of accommodation and protects against discrimination where a person is in receipt of housing assistance from the State such as rent supplement, housing assistance payments or other social welfare payments to assist with housing. The housing assistance ground protects anyone who has applied for and is eligible to receive such payments and applies both to existing tenants and to those who are looking for accommodation.

The Residential Tenancies Acts 2004-2024 (RTA) regulate the landlord-tenant relationship in the private residential rented sector and set out the rights and obligations of landlords and tenants. The Residential Tenancies Board (RTB) was established as a quasi-judicial, independent statutory body under the RTA to facilitate the resolution of residential tenancy disputes and operate a national tenancy registration system. A dispute may be referred to the RTB under Part 6 of the RTA.

Section 34 of the RTA provides that a landlord must state a reason for the termination in any Notice of Termination served in respect of a 'Part 4 tenancy', and section 66 of the RTA provides for the minimum termination notice periods (up to 224 days) to terminate a tenancy where there is no breach of tenancy obligations. Section 67 of the RTA provides the required procedures and notice periods for a landlord to terminate a tenancy where the tenant fails to comply with any of the tenancy obligations: for example, by not paying the rent or engaging in anti-social behaviour.

IV. Inequalities in access and outcomes regarding the right to education

42. The Commissioner recommends that the Irish authorities take measures to address racism against and bullying of Traveller and Roma children in schools, including:

- ✓ **Ensuring that teachers and school staff are fully trained regarding children's equal rights to education and fully implementing the Action Plan on Bullying.**
- ✓ **Recruiting more Traveller and Roma teachers and staff.**
- ✓ **Encouraging more schools to join the Yellow Flag Programme.**

The Traveller and Roma Education Strategy 2024-2030 (TRES) has been specifically developed to meet the needs of children, young people and adults from the Traveller and Roma communities with the aim of enhancing their education experience and success. One of the actions contained in this strategy is to promote diversity among the school staff. This will include building on the Teaching Transforms campaign to increase the supply of teachers, to increase the diversity of the teaching workforce, and to encourage career changers to consider teaching as a profession. Irish Travellers are one of the specific target groups for this campaign.

Separately, in conjunction with work on the first Special Needs Assistants Workforce Development Plan, the strategy aims to promote employment opportunities for the Traveller and Roma communities in special needs assistant roles.

The Minister for Education announced the new Cineáltas: Action Plan on Bullying in December 2022 and the Bí Cineálta Procedures to Prevent and Address Bullying Behaviour for Primary and Post-Primary Schools in June 2024. The procedures include, in their definition of bullying:

‘Racist bullying: behaviour or language that intends to harm a student because of their race or ethnic origin which includes membership of the Traveller or Roma community. Racism is defined in the National Action Plan Against Racism.’

The Procedures identify strategies to prevent bullying behaviour, including the provision of supports to school staff to support students from ethnic minorities, including Traveller and Roma students, and to encourage communication with their parents. Implementation of the Procedures is supported by a suite of professional learning resources and information sessions for all school staff, board of management members and parents. These include online information seminars for school leaders and face-to-face professional learning events delivered by Oide, the Department of Education’s (DoE) teacher professional learning service. In addition, all schools can avail of a half-day closure in the current school year to allow for the engagement of all school staff with the Procedures.

Additionally, as part of the implementation of the Action Plan on Bullying, DoE has committed to the development of a national database to facilitate data on bullying behaviour being collated in an anonymised manner with a view to informing an annual national report on bullying behaviour in schools.

A Traveller culture and history research report was published by the National Council for Curriculum and Assessment (NCCA) in March 2023. As a means of augmenting the research report and illustrating how it can support teaching and learning about Traveller culture and history within the curriculum, examples of practice in teaching and learning about aspects of Traveller culture and history contained within the report were gathered by the NCCA from early childhood settings, primary schools and post-primary schools in the first half of 2023.

Video guidance for teachers is being finalised and will be published shortly along with further resources and teaching guidance.

Oide also provides bespoke, school-based support, on demand, which allows teachers and school leaders to explore inclusive practices and, as a result, to respond directly to the needs of learners in their own context. Oide has also developed a new seminar called “Fostering a Culture of Inclusion” for teachers and school leaders.

43. The authorities should ensure the diligent application of the Guidelines on the reduced school hours in all schools and conduct targeted rights awareness campaigns among Traveller and Roma communities to empower parents to support their children in the education system.

In September 2021, the Department of Education (DoE) issued Reduced School Day Guidelines to all schools on the procedures to be followed when reduced school days (RSD) are put in place for students. These guidelines came into effect on 1 January 2022. The guidelines set

out the process to be followed where the use of RSD is under consideration for a student, to ensure that the use of RSD is limited only to those circumstances where it is absolutely necessary and, where such usage occurs, that schools follow best practice with the interests of the student brought to the fore. The guidelines are intended to support parents and schools and to ensure that the necessary interventions to assist and support students are put in place. It is recognised that, in certain situations, the use of RSD is a positive intervention with a view to assisting a student to return to full time attendance and that in some instances parents may request RSD to support their child to return to full time attendance.

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

School inspectors and National Educational Psychological Service psychologists raise the use of the RSD during their meetings or inspections in schools. The Inspectorate also conduct dedicated inspections in schools with high numbers of children from Traveller and Roma backgrounds. These inspections have a specific focus on attendance, the use of RSD, and literacy rates amongst Traveller and Roma children and young people.

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

As part of the Traveller and Roma Education Strategy 2024-2030 (TRES), a number of initiatives and resources are being introduced to support Traveller and Roma children and young people and their families. This will include increasing the awareness of the RSD guidelines and of the rights and obligations for both schools and Traveller and Roma families. In 2024, a video was developed specifically for parents of Traveller children to inform them of their rights in respect of RSD and has been promoted through the TRES Information Series.

44. The Commissioner recommends that the authorities review the disproportionate placement of Traveller and Roma children in special support groups and ensure their equal access to Irish language classes.

The Department of Education policy is that all students must be given every reasonable opportunity to participate in the learning of Irish for as long as possible in order to achieve a level of personal proficiency that is appropriate to their needs and ability. The available curricula recognise and support students' engagement with Irish at different stages along their language-learning journey allowing them to build on the language knowledge and experience that students bring to school.

In that context, exemptions from the study of Irish may only be considered in exceptional circumstances. Those circumstances are set out in Section 2.2 of Circulars 0054/2022 – Primary and 0055/2022 – Post-primary. A child being educated in a recognised school in

Ireland should not be excused from the study of Irish unless they hold a Certificate of Exemption. These rules apply to all students, irrespective of their social background, country of origin or reason for being in Ireland.

V. Inequalities in access and outcomes regarding the right to health

50. The Commissioner recommends that the Irish authorities ensure effective implementation of the National Traveller Health Action Plan (NTHAP) and the National Traveller Mental Health Action Plan through adequate allocation of recurring budgets and resources, paying attention to the special needs and concerns of Traveller women, children, and young people.

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

The HSE has a ring-fenced budget of over €10 million for the provision of Traveller-specific health services. This is in addition to the funding provided for general healthcare services that are availed of by the Traveller community, such as GMS, public health, acute hospitals, mental health, and community care. Additional resources have also been provided for drug services, including services that target Travellers affected by problematic drug and alcohol use.

In Budget 2023, €1.3 million in funding was provided on a recurrent basis specifically for the implementation of this plan. The funding was allocated to establish two new PHCTPs and to expand and improve other Primary Healthcare Projects across the country. The funding was also used for training and other activities to improve the delivery of healthcare services for Travellers. A further €500,000 was allocated in 2025 to provide and improve healthcare services specifically for Traveller children.

The Department of Health has also run additional funding calls on Traveller health, to support the implementation of the NTHAP. This includes €500,000 to improve healthcare services and address the social determinants of health for Traveller women who experience homelessness, under the Women's Health Action Plan, and €710,000 to address the social determinants of Traveller health in conjunction with the Healthy Communities Programme.

A mid-term review of the NTHAP and a review of the PHCTPs is to take place in 2025 and will provide evidence to improve and expand effective health services for Travellers. While there

is no separate National Traveller Mental Health Action Plan, both the DoH and the HSE are committed to developing priorities, strategies, and actions on Traveller mental health within the framework of the NTHAP.

In that regard, the HSE has established a National Traveller Mental Health Working Group whose purpose is to serve as a central coordination group to monitor progress, streamline, and influence the prioritisation of actions identified in various Mental Health policies and strategies aligned with the NTHAP. The Group is chaired by the General Manager of HSE National Mental Health Operations, who reports to the Assistant National Director of National Mental Health Operations. It is made up of representatives from the HSE's Mental Health Operations, the National Office of Suicide Prevention, Service coordinators for Travellers a Lived Experience Representative and the Department of Health's Mental Health and Social Inclusion Unit. Other members include representatives of three national Traveller representative groups. The Group meets quarterly, in locations which allow for the Group to visit and engage with local Traveller project groups working on the ground (including with HSE teams supporting Mental Health service delivery to the Traveller and/or Roma Communities in regions, with representative groups, and so on).

Since 2023, through the NTHAP, 7 Primary Care Support Worker posts have been funded recurrently to work specifically with Travellers with mental health concerns.

In 2024, the group funded and supported Travellers Together Preventing Suicide, an annual campaign at national and local levels which seeks to create awareness and tackle stigma in relation to Traveller suicide.

Funding was also provided for 10 Youth Mental Health First Aid training courses for those working with young Travellers. This course teaches participants how to assist a young person who may be experiencing a mental health problem or mental health crisis until appropriate professional help is received or the crisis resolves, using a practical, evidence-based action plan.

In 2025, 9 Travellers will graduate with NFQ level 5 qualification in Understanding Mental Health through the funded Copper Art Skills project. The course is aimed at building an improved understanding of mental health in the community by highlighting innovative approaches to engaging the Traveller community, sharing knowledge and experience along with learning the skill set of copper art.

51. The authorities should provide sustained funding for peer-led Traveller-specific mental health support through primary healthcare projects at local level, prioritising suicide awareness and prevention activities.

In Budget 2025, additional ring-fenced funding of €365,000 was secured for Traveller mental health initiatives. In addition, funding of €200,000 for the Traveller Counselling Service (TCS) (a community-based counselling service for the Traveller community), which was allocated on a once-off basis for 2024, has been mainstreamed under Budget 2025, bringing the total funding for Traveller mental health to €565,000. This builds on previous years' support to

expand the provision of TCS's services to young Travellers, ensuring that this culturally inclusive counselling service receives the support that it needs.

In addition, funding will be provided for two dedicated Suicide Crisis Assessment Nurses (SCAN), who will work directly with Travellers and provide training and support to the network of other SCAN nurses across the country. Funding has also been made available for other culturally appropriate suicide bereavement supports for Travellers, ensuring that the services provided at what is a very sensitive time for families and communities, are responsive to their specific needs. This will provide ringfenced supports with oversight from the National Traveller Mental Health Working Group.

52. The Commissioner recommends that the authorities enhance access to basic healthcare, including mental and maternal healthcare for Roma, including through the issuance of medical cards for them and improved access to interpretation services.

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

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

Additionally, an implementation plan for the mental health actions in NTRIS II has been developed. Once-off funding has been provided as part of Budget 2025 to fund research into the mental health support needs of Roma in Ireland. A new implementation plan for *Sharing the Vision*, the national mental health policy, is currently being developed. The needs of the Roma community will also be addressed through the implementation of Recommendation 61 under that policy, which aims to ensure that mental health services are inclusive and take account of the cultural and diverse needs of the entire population, including people from minority backgrounds.