



Comhairle Contae Thiobraid Árann
Tipperary County Council

Tipperary County Council: Implementing the Public Sector Equality and Human Rights Duty in relation to Roma and Accommodation Provision

Implementation Plan

November 2023

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1. Introduction

This implementation plan establishes the ambition, approach, and steps to be taken by Tipperary County Council to implement the public sector equality and human rights duty (the Duty)¹, in relation to Roma and accommodation provision.

The Duty requires public bodies to have regard to the need to eliminate discrimination, promote equality, and protect human rights for service users, policy beneficiaries, and employees, across all function areas.

Public bodies are required to:

Step one: assess - undertake an assessment of the equality and human rights issues facing the identified groups for the Duty that would have a relevance for their functions;

Step two: address - identify the steps being taken or proposed to be taken to address the issues as assessed; and

Step three: report – report annually on their achievements in addressing these issues and their progress in implementing the Duty.

This implementation plan draws from and reflects the ‘Public Sector Duty Implementation Strategy and Action Plan’ of Tipperary County Council.

2. Equality and Human Rights Values Statement

2.1 Introduction

Implementation of the Duty serves to embed equality and human rights in the mainstream of how we implement our functions. This equality and human rights values statement establishes our ambition for the Duty and its implementation. It identifies and defines five values that motivate our ambition for the Duty: respect; inclusivity; voice; choice; and social sustainability.

For each of these five values, two statements set out the implications of these values for the provision of accommodation services to Roma:

- a statement of outcome – the implications of the value for the change we seek to contribute to as an organisation in the provision of accommodation services to Roma; and
- a statement of process – the implications of the value for the way we work in the provision of accommodation services to Roma.

This equality and human rights values statement provides a frame for our implementation of the Duty in relation to Roma and accommodation provision. It provides benchmarks, in the statement of outcome and the statement of process for each value, to ensure plans, strategies, internal policies, programmes, relevant to Roma and accommodation provision, are aligned with our ambitions for equality and human rights in our implementation of the Duty.

2.2 Equality and Human Rights Values Statement

¹ [Section 42](#), Irish Human Rights and Equality Commission Act 2014.

Respect is about dignity and valuing intrinsic human worth, and fairness and treating people equally. It involves building trust and is rooted in empathy, being ethical, impartiality, and compassion.

Statement of Outcome: Tipperary County Council, in providing accommodation services to Roma, strives to build trust with the Roma community, to communicate its commitment to equality and human rights to the Roma community, and to hold a reputation as an organisation where Roma can expect to be treated equally.

Statement of Process: Tipperary County Council, in providing accommodation services to Roma, works in a manner that is person-centred, respectful, caring, and free from all forms of discrimination.

Inclusivity is about recognising and valuing diversity, and understanding and responding to the practical implications of diversity. It involves being flexible, accessible, and accommodating the specific needs that arise from diversity.

Statement of Outcome: Tipperary County Council, in providing accommodation services to Roma, strives to ensure its services are accessible in their design and delivery, and to underpin this through proactive engagement with the Roma community and the provision of accessible information to the Roma community.

Statement of Process: Tipperary County Council, in providing accommodation services to Roma, works in a manner that is open to, understands, and makes reasonable accommodations for language difference and cultural difference.

Voice is about empowerment, having a say in decision-making, and accountability. It involves collaboration and partnership, participation in decision-making structures and consultation processes, and support to enable a meaningful engagement in such structures and processes.

Statement of Outcome: Tipperary County Council, in providing accommodation services to Roma, strives to provide support to empower and facilitate the collective voice of the Roma community, consult meaningfully with the Roma community, and engage the Roma community, with effect, in relevant organisational structures for policy making, such as the relevant SPCs, Tipperary Migrant Forum, and the PPN.

Statement of Process: Tipperary County Council, in providing accommodation services to Roma, works in a manner that listens to Roma service users, actively seeks and facilitates their engagement, and offers an accountability to Roma service users.

Choice is about options and self-determination. It involves being enabled to make informed choices from among real options.

Statement of Outcome: Tipperary County Council, in providing accommodation services to Roma, strives to maximise the options open and available to the Roma community and communicate these options.

Statement of Process: Tipperary County Council, in providing accommodation services to Roma, works in a manner that identifies, interprets and is responsive to the full spectrum of their needs, and that enables and allows for informed choices to be made.

Social sustainability is about planning for, distributing, and enabling access to resources, such as employment, income, accommodation, education and health, with a view to addressing disadvantage and achieving sustainable and resilient communities.

Statement of Outcome: Tipperary County Council, in providing accommodation services to Roma, strives to ensure benefit to and change for the Roma community in the resources made available, in a manner that builds on the strengths and capacity already in the community.

Statement of Process: Tipperary County Council, in providing accommodation services to Roma, works in a manner that targets and takes positive action to address the disadvantage of Roma service-users.

3. Step One: Assess

3.1 Introduction

This assessment of equality and human rights issues has been undertaken in compliance with S42 of the Irish Human Rights and Equality Commission Act 2014, and in accordance with the guidance issued by IHREC for this step.²

The assessment is focused specifically on the Roma community, and the intersectional diversity within the Roma community, and on the single function of accommodation provision. **This assessment is not an assessment of the performance of Tipperary County Council on equality and human rights.**

The assessment of equality and human rights issues involves an examination of the situation, experience, and identity of Roma as these might relate to accommodation services, where:

- **Situation** of the group in terms of their access to resources and any particular disadvantage they experience.
- **Experience** of the group in terms of the quality of their interaction with employers and service providers and the wider society.
- **Identity** of the group in terms of how they chose to give expression to their identity and the specific needs that arise from their identity.

The functions of Tipperary County Council of relevance for this task encompass: accommodation planning and provision; customer service; and community services.

The five values that motivate our ambitions for equality and human rights in implementing the Duty, are used as a framework to set out this assessment of the equality and human rights issues.

3.2 Assessment of Equality and Human Rights Issues

Respect is about dignity and valuing intrinsic human worth, and fairness and treating people equally. It involves building trust and is rooted in empathy, being ethical, impartiality, and compassion.

² [Tool for an Evidence Based Assessment of Equality and Human Rights Issues](#), Irish Human Rights and Equality Commission (2020).

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to Roma and the functions relevant to accommodation provision, are:

- Stereotypes, bias and negative perceptions held about Roma, and being othered and seen as outside a norm, and particularly for Roma women.
- Discrimination and racism, at both individual and systemic levels, with:
 - high levels of discrimination against Roma in accessing accommodation and while in accommodation, and in accessing social protection.
 - Roma feeling discriminated against, victimised and harassed in their interactions with public bodies.
 - high levels of racism and physical and verbal abuse experienced in public spaces.
- Lack of awareness of rights, low levels of reporting of infringement of rights, and barriers to exercising rights due to lack of trust in the systems established.
- Isolation and segregation, being hidden and being invisible, and lack of engagement by and follow-up from services as a result, in particular for Roma women.
- Insecurity and feeling unsafe.
- Roma women experiencing domestic violence and barriers to accessing the necessary support services.
- Roma women experiencing gender discrimination within their own community.
- Limited interaction with the wider community, lack of opportunities for interaction, absence of invitation to be involved in community events and processes, and experiences of racism.

Inclusivity *is about recognising and valuing diversity, and understanding and responding to the practical implications of diversity. It involves being flexible, accessible, and accommodating the specific needs that arise from diversity.*

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to Roma and the functions relevant to accommodation provision, are:

- Lack of understanding of and knowledge about Roma culture and identity and about Roma history, and the trauma associated with this.
- Lack of flexibility in adapting services to accommodate Roma culture and identity, with:
 - lack of flexibility in accommodating cultural difference.
 - demands on Roma to adapt and conform.
- Lack of response to language difference, and the diversity of languages among Roma, in terms of translation, interpretation, and supports to learn English, with:
 - many experiencing barriers to engaging with services and in filling out forms.
 - lack of adequate English language and literacy supports made available.
- Lack of opportunities to explore, represent, showcase and celebrate Roma culture and identity.
- Lack of data on the presence of Roma and lack of an ethnic identifier and failure to gather data on Roma access to, participation in and outcomes from services.

Voice *is about empowerment, having a say in decision-making, and accountability. It involves collaboration and partnership, participation in decision-making structures and consultation processes, and support to enable a meaningful engagement in such structures and processes.*

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to Roma and the functions relevant to accommodation provision, are:

- Lack of presence in decision-making structures.
- Lack of opportunities to have a say or to be engaged in consultations.
- Lack of organisation through which to communicate collectively on, and to represent, Roma issues.

Choice *is about options and self-determination. It involves being enabled to make informed choices from among real options.*

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to Roma and the functions relevant to accommodation provision, are:

- Lack of options in the services available to Roma, in particular public services, with:
 - significant numbers of Roma unable to access a PPS number.
 - barriers arising for Roma from the HRC, its interpretation and the manner of its application, including due to difficulties in accessing appropriate documentation.
 - barriers arising for Roma from Circular 41/2012, its interpretation and the manner of its application.
- Lack of trust in authority and pressures of survival, leading to decisions not to engage with services.
- Lack of information on and communication about options and choices available, and lack of supports to navigate how things work and to understand complex decision-making systems and structures.
- Dreams and aspirations limited by current circumstances, acceptance of one's lot, lack of belief that change is possible, and lack of role models.

Social Sustainability *is about planning for, distributing, and enabling access to resources, such as employment, income, accommodation, education and health, with a view to addressing disadvantage and achieving sustainable and resilient communities.*

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to Roma and the functions relevant to accommodation provision, are:

- Poor standard of accommodation and living conditions, with:
 - many Roma living in private rented accommodation without a tenancy agreement and in insecure and irregular situations.
 - many Roma living in private rented accommodation without secure, adequate or safe living conditions.
- Lack of access to and outcomes in relation to social housing provision.
- Homelessness, with:
 - high levels of homelessness, reflecting significant over-representation.
 - significant levels of 'hidden homelessness' for Roma with overcrowding.
 - evictions from private rented accommodation.
 - lack of access to and outcomes from homeless services.
 - over-reliance on the HAP scheme in contexts of high-levels of discrimination in the private rented sector.

- Particular consequences for marginalised groups, including Roma, of the current housing and homelessness crisis.
- Poverty, material deprivation, and low levels of income, with:
 - significant numbers of Roma living in extreme poverty.
 - high levels of malnourishment and fuel poverty among Roma.
- Unemployment, with:
 - low levels of employment among Roma.
 - many Roma working in irregular situations.

4. Enabling Implementation

4.1 Leadership

The Tipperary County Council senior management team provide key leadership for the ongoing implementation of the Duty across all functions and for all identified groups, in: being familiar with the Duty and its requirements; and acting as a champion for its implementation in Tipperary County Council.

The Tipperary County Council management team in relation to housing and homeless services provide key leadership for the ongoing implementation of this specific implementation plan for the Duty, with its focus on Roma and accommodation provision. In this the management team: familiarises itself with the Duty and its requirements; champions and enables the ongoing implementation of this implementation plan; and sustains a focus on Roma within its processes of monitoring the situation and experience of vulnerable clients.

4.2 Driver

A Roma Accommodation Consultative Committee will be convened to drive the ongoing implementation of this implementation plan for the Duty as it relates to Roma and accommodation.

4.3 Engagement

An ongoing engagement will be sustained with other relevant agencies and with the wider Roma community to support implementation of this implementation plan. This engagement is currently structured, and will continue, through the Roma Health & Accommodation Project, including its focus on implementing the Duty.

4.4 Capacity

Specific training will be provided to enable relevant staff to develop the skills to implement the Address step of the Duty when developing or reviewing plans, strategies, internal policies or programmes.

4.5 Communication

The Duty and its requirements, the values and their benchmarks in our equality and human rights statement, and our achievements under the Duty will be a focus for internal communications, including through: the staff newsletter; Tipperary Together; and the intranet.

Tipperary County Council will sustain a focus on the values and their benchmarks in our equality and human rights statement:

- by circulating the statement internally and externally;
- in staff training and induction;
- in externally communicating our work in implementing the Duty; and
- in using this statement as a template for other departments in implementing the Duty, each with their own statements of outcome and of purpose.

5. Step Two: Address

5.1 The Address Step

The 'address' step of the Duty is implemented as part of the development, monitoring, and review of plans, internal policies, strategies, and programmes.

At the commencement of the development/monitoring/review process, this involves action to:

- Review the assessment of equality and human rights issues to establish those equality and human rights issues that are relevant to the particular plan, internal policy, strategy, or programme.
- Gather the data and information available in relation to the equality and human rights issues identified as relevant, making use of the evidence book in appendix one.
- Review the equality and human rights values statement to extract the statements of outcome (if for a plan, strategy, or programme) or statements of process (if for an internal policy) that are relevant for use as benchmarks.
- Include this material in any brief for the development/monitoring/review process.

In implementing the development/monitoring/review process, this involves action to:

- Include an examination of the relevant equality and human rights issues in any evaluation or contextual review conducted.
- Transmit the obligations under the Duty to any external consultants contracted and ensure they are fully briefed in this regard.
- Track the relevant equality and human rights issues to ensure they are addressed and the values benchmarks to ensure they are respected during the development/monitoring/review process.

At final draft stage of the development/monitoring/review process, this includes action to:

- Convene a meeting of relevant staff to check: does the draft adequately and appropriately take up and address each of the equality and human rights issues identified as relevant? Is the draft adequately and appropriately aligned with the statement of priority/statement of process for each of the values in the equality and human rights values statement?
- Conduct a participative exercise, for initiatives of scale with relevant civil society organisations to check that the equality and human rights issues are adequately and appropriately identified and addressed.

After the development/monitoring/review process, this involves action to:

- Establish and implement systems to track progress on the equality and human rights issues identified as relevant.

- Report annually on achievements in addressing the equality and human rights issues and reflecting the statement of priority/statement of process for each of our equality and human rights values.
- Use this report to reflect on achievements and to strengthen the plan, programme, policy or procedure as found to be necessary.

5.2 Immediate Action

Develop a terms-of-reference for and establish a Roma Accommodation Consultative Committee.

Sustain engagement with the Roma Health & Accommodation Project.

Mainstream the employment of a Roma liaison worker.

Establish a KPI with regard to meeting Roma accommodation needs.

Communicate internally and externally about the work being done to implement the Duty in relation to Roma and accommodation by Tipperary County Council.

Engage with the relevant organisations at national level on the formulation and implementation of the Circular 41/2012 and the Habitual Residence Condition.

5.3 Key Moments and Processes

Key moments that would be a focus for implementing the address step of the Duty in relation to Roma and accommodation provision, will be the development, monitoring, or review of:

- The Housing Allocations Scheme;
- The Homeless Action Plan
- The Migrant Integration Strategy;
- The Customer Charter;
- Tipperary County Council Equality Policies;
- Tipperary County Council Key Performance Indicators;
- The Local Economic and Community Plan;
- The Service Delivery Plan; and
- The Corporate Plan.

Further potential key moments will be tracked and addressed as they arise, in relation to other plans, policies or strategies of relevance.

6. Step Three: Report

Tipperary County Council will include a report on the implementation of the Duty and progress achieved on foot of this in each Annual Report, including in relation to this implementation plan.

Appendix One: Evidence Book

This assessment of equality and human rights is evidence-based in drawing from: local and national research, national policy strategies, and European reports.

The Pavee Point and Department of Justice and Equality (2018) [Roma in Ireland: A national needs assessment](#) identifies issues of situation, experience and identity.

In relation to **situation**:

- Up to 20% of respondents stated that they are experiencing poverty that would be considered extreme.
- 19.8% had no access to a PPS number and limited access to services.
- 51.9% of all respondents reported that someone in the household has gone to bed hungry. 46.2% of all respondents reported not having enough fuel and 66.3% were unable to afford to keep their home warm all of the time.
- 71.2% of respondents reported that they have difficulty reading English forms and 66% said they had difficulty filling in English forms.
- 16.7% of respondents reported that they are in employment
- In practice the lack of access to employment for Roma, combined with issues in having appropriate documentation make it very hard for many Roma to fulfil the requirements of the right to reside and habitual residence.
- The majority of respondents reported living in private rented accommodation (76.9%); of these 77.1% were renting from a private landlord and 13.3% were renting from a local authority. 6.6% of respondents reported that they are homeless.
- Overcrowding is identified as a major concern. 24% of Roma respondents lived in households of 8 or more people. 44.8% of respondents said they did not have enough beds in their accommodation.
- Poor quality of accommodation is an issue. 12.4% of respondents do not have a kitchen. 9.6% do not have a cooker and 13.5% do not have a fridge. 4.4% did not have a bathroom in the house or flat.
- The low number of respondents in local authority accommodation is notable. The Departmental Circular referred to above precludes Roma who do not meet the criteria from completing a needs assessment for a range of social housing supports.
- The levels of reported poor mental health were extremely high with 51.3% of respondents reporting more than 14 days of the previous month when their mental health was not good.
- 50% of respondents reported that they did not have a medical card.
- The research indicates significant levels of educational disadvantage experienced by adult respondents

In relation to **experience**:

- Respondents reported feeling discriminated against at both an institutional and individual level. The highest rates of perceived discrimination were reported in accessing accommodation (93%) and social protection (84.3%). When in accommodation, 66.3% of the respondents reported feeling discriminated against by a landlord or local authority.
- 81.1% of respondents also reported experiencing racism and verbal abuse in public spaces with women being identified as particularly vulnerable.
- Insecurity of tenure as 36.6% of respondents reported that they did not have a tenancy agreement.
- Domestic violence was identified by service providers as a health issue.

In relation to **identity**:

- Across all services communication between Roma and service providers emerged as an issue. The findings show that there is a wide diversity of languages spoken among Roma in Ireland, with the majority of people speaking Romani as their first language.

The EU Agency for Fundamental Rights (2020), [Roma and Traveller in Six Countries](#) identifies issues of situation and experience.

In relation to **situation**:

- In the six countries surveyed, a significant proportion of the Roma and Travellers report difficulties or great difficulties in making ends meet. Most worryingly, the results show unacceptably high rates of adults and children 'going to bed hungry' at least once in the last month. Every fourth Roma and Traveller child surveyed (23 %) lives in a household characterised by severe material deprivation, where the household is not able to afford at least four out of nine basic expenditures, such as healthy food or heating, or is in arrears with paying the rent or unable to afford a week's holiday in a year, compared with the EU average of 6.6 % for children in the general population in 2018.
- Many Roma and Travellers live in conditions of severe housing deprivation, according to the survey results.

In relation to **experience**:

- Almost half of the respondents (45 %) felt discriminated against in at least one area of life in the previous 12 months.
- Almost half of the respondents have felt discriminated against when looking for housing in the past five years because of being Roma or Travellers.
- Almost half of EU citizens (45 %) feel (totally) uncomfortable with having Roma or Travellers as neighbours.
- Almost half of the Roma and Travellers surveyed (44 %) experienced hate-motivated harassment in the year preceding the survey, and 7 % were physically attacked, the results show.
- The survey results show that only every second Roma and Traveller respondent (53 %) is aware of laws prohibiting discrimination based on skin colour, ethnic origin or religion. Only one third of respondents (33 %) know of at least one institution that deals with discrimination and equality issues in their country. This is mirrored in very low levels of reporting discrimination. The survey finds that over the past five years only one in five incidents (21 %) was reported anywhere, and of those only 5 % to the competent equality body. According to the survey results, the majority (60 %) of those who did not report said that they avoided doing so because they thought that 'nothing would happen or change'.

The ESRI and IHREC report (2017) [Who Experiences Discrimination in Ireland: Evidence from the QNHS Equality Modules](#) identifies issues of situation and experience.

In relation to **situation**:

- The higher levels of discrimination found in housing when compared to other services signals yet another negative consequence of the severe pressures associated with a housing stock that is inadequate to meet demand. High rents and inadequate stock may have particular consequences for disadvantaged groups, and further research could identify those groups most at risk of housing discrimination.

In relation to **experience**:

- Discrimination varies significantly across equality groups, and is high in multiple domains among minority ethnic groups (Black, Asian and especially Irish Travellers), minority religions and those with a disability.
- In terms of national/ethnic differences in relation to public services (education, health, transport and other public services), Black respondents are three times more likely to report discrimination than White Irish. Nearly 10 per cent of the Black/Other ethnicity group report discrimination in public services, compared to 3.2 and 3.6 per cent of White Irish and White Non-Irish groups respectively. (2014)
- Compared to White Irish, Black respondents are almost five times more likely to report discrimination in regards to private services, such as shops, banks and housing. 18.5 per cent of Black/Other and 15.7 per cent of Asian ethnic groups report private service-related discrimination, compared to 4.1 per cent of White Irish and 5.6 per cent of White Non-Irish ethnic groups. (2014)
- Black respondents were over three times more likely to report discrimination in the workplace than White Irish respondents. 8.5 per cent, 10 per cent, and 13.8 per cent, respectively, of White Non-Irish, Asian and Black/Other reported discrimination in the workplace. (2014)
- Rates of discrimination (when looking for work) were also significantly higher among Black/Other ethnic groups (16.5 per cent) compared to Asian and White Irish (7.5 per cent) and White Non-Irish (5.4 per cent). (2014)

The Department of Justice and Equality [National Traveller and Roma Inclusion Strategy 2017-2021](#) identifies issues of situation and identity.

In relation to **situation**:

- Travellers and Roma are among the most disadvantaged and marginalised people in Ireland.
- 80% of Roma interviewed across the EU are at risk of poverty compared with an EU average of 17%.
- Poor education completion rates of both Traveller and Roma children and youths.
- High reported rate of mental health problems in both the Traveller and Roma communities.

In relation to **identity**:

- A new system of ethnic identifiers is needed across the public sector to help to track progress and/or challenges for the Traveller and Roma communities.
- The Roma community in Ireland consists of persons from a range of European countries including Romania, Hungary, Slovakia, Poland and the Czech Republic (Czechia).
- There are no official statistics on the number of Roma in Ireland.
- Discussions with Traveller and Roma representatives and other relevant stakeholders has resulted in a change of emphasis from integration to inclusion which is seen as better capturing what we want to achieve for these communities in our society.

The 2023 public attitudes to diversity survey <https://www.gov.ie/en/press-release/ba395-new-survey-examines-people-in-irelands-attitudes-to-diversity/> identifies issues of experience.

In relation to **experience**:

- When people were asked about people from the different groups living 'next door' to them, there were six groups who scored below the average when respondents were asked about their level of comfort of that equality group living next door to them, including: a person who is a Traveller was scored 7.1, and a person who is Roma was scored 7.1. The majority of people would be comfortable with a person from the Traveller or Roma community living next door. However, 16% of people said they would be uncomfortable (a score of 1, 2 or 3) with a person from the Traveller, or Roma community as a neighbour.
- When asked how uncomfortable or comfortable they would feel if one of their children was in a love relationship with a person from the different equality groups, there were 11 groups that score less than 8 out of 10, including Roma scoring 6.4.
- Respondents were asked that when a company wants to hire someone and has the choice between two candidates with equal skills and qualifications, which characteristics would put a candidate at a disadvantage. There was widespread agreement that Travellers and Roma and people with a disability would be put at a disadvantage. Approximately two out of three people agreed that these groups would experience discrimination.

The European Commission, DG Justice and Consumers (2018) Civil society monitoring report on implementation of the national Roma integration strategy in Ireland: assessing progress in four key policy areas of the strategy, prepared by Pavee Point Traveller and Roma Centre, <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-ireland-2018-eprint.pdf> identifies issues of situation, experience and identity.

In relation to **situation**:

- Across the four domains of employment, education, accommodation, and health, the situation and experience of Travellers and Roma has not seen any tangible improvement and the inequality gap between Travellers and Roma, and the majority population remains entrenched.
- In the domain of accommodation, in particular, the situation and experience of Travellers and Roma has deteriorated, within the wider Irish context of an unprecedented housing and homeless crisis.
- The Traveller and Roma communities, already significantly marginalised in terms of access to adequate housing and related supports, as well as experiencing high levels of discrimination in access to housing, have become increasingly marginal in current policy focus and political debate on the housing and homeless crisis.
- The National Needs Assessment of Roma in Ireland found that 20 per cent of Roma were living in extreme poverty, in sub-standard accommodation, often without basic amenities (12.4 per cent did not have a kitchen, 9.6 per cent did not have a cooker, and 13.5 per cent did not have a fridge).
- 44 per cent of the Roma respondents for the needs assessment, said they were living in overcrowded conditions. Roma families report living in overcrowded conditions reported having problems with rats, damp and sewerage problems. Living in unsafe and overcrowded accommodation generates a serious concern for safety and child welfare.

- The significant over-representation of Travellers and Roma in the homeless population.
- For Roma without financial means, many are excluded from social housing and homeless accommodation and welfare housing supports due to regulatory restrictions, in particular the HRC and interpretation by local authorities of the Departmental Circular 41/2012.
- For many Roma, access to State funded employment-related services and supports can be severely curtailed due to the impact of implementation of European Directive 2004/38 on the freedom of movement and residence and the Habitual Residence Condition (HRC). As a result, many Roma seek employment through the grey economy.
- Roma without financial means continue to be denied access to medical and healthcare benefits, such as a medical card, due to the restrictions of statutory regulatory conditions. The Habitual Residence Condition continues to pose a barrier to many Roma in seeking access to state welfare and health related benefits as well as certain statutory funded services such as domestic violence refuges.
- In 25 per cent of households, it was reported that children have gone to school hungry and 57.5 per cent of families could not afford books and school uniforms.
- The absence of any actions in the NTRIS relating to addressing the housing and accommodation needs of Roma is an issue that needs to be addressed.

In relation to **experience**:

- High levels of experienced discrimination against Travellers and Roma in accessing accommodation, particularly in the private rental sector. The Roma needs assessment found that the highest rates of discrimination experienced by Roma were in regard to accessing accommodation (93 per cent): 66.3 per cent of the respondents reported feeling discriminated against by a landlord or local authority.

In relation to **identity**:

- Inadequate English language and literacy supports, as well as parents' own experiences of discrimination in accessing education were identified as barriers to Roma children achieving good educational outcomes.

The 2020 Dept Children, Equality, Disability, Integration and Youth, [Spotlight Report on young Travellers \(including some data on young Roma\)](#) identifies issues of situation, experience and identity.

In relation to **situation**:

- Roma children in Early Years services (pre-school year) number: 475 in 2015/16; 853 in 2016/17; and 688 in 2017/18.
- There is evidence of growing engagement of Roma children with mainstream education: 2016 – 1,375; 2017 – 1,553 and 2018 – 1,690.

In relation to **experience**:

- Roma children engaged with Special Classes or Special Schools number: 2016 – 27; 2017 - 33 and 2018 – 46.

In relation to **identity**:

- Only a limited amount of data focusing on young people in Roma communities in Ireland exists. Early years services are asked to report the aggregate number of children from the Roma Community.

The 2013 NASC report [In From the Margins – Roma in Ireland](#) identifies issues of situation, experience and identity.

In relation to **situation**:

- Roma community characterised by low levels of education and low literacy rates, making the majority of those Roma actively seeking work tending to fall into low-skilled labour.
- In Cork, the majority of the Roma community live together in one housing estate, often in cramped and overcrowded conditions. All residents in this estate are in private rented accommodation. 65% of respondents at present live in private rented accommodation while the remaining 35% are living with family. One is currently homeless. None of the respondents in this study have been offered social housing.
- 45% of respondents confirmed that they had experienced homelessness since arriving in Ireland and this percentage rose to 50% for female respondents.
- Roma are an at-risk group in terms of health. They have a higher infant mortality rate, lower life expectancy and a higher rate of diseases. A lack of access to health services compounds this problem.
- The misapplication of the Habitual Residence Condition, as well as a lack of knowledge about the variations on residency rights for Romanians and Bulgarians, creates significant barriers for Roma seeking to access social welfare payments, including rent allowance, resulting in poverty, deprivation and social exclusion. This issue also affects access to adult education services.
- In order to qualify for Job Seekers Allowance, a claimant must be deemed to be available for employment. The availability to work requirement is interpreted by the Department as requiring all applicants to hold or have held a work permit in the previous twelve months. This clearly falls outside the Department's own definition of availability for work as stated above. This places the Roma in a 'catch 22' situation. A work permit is only granted if the applicant has found work; if the applicant has found work he/she is no longer available for work and is therefore not entitled to a benefit.
- Many Roma may not have the standard documentation required by the Department of Social Protection. This is often the case with marginalised groups. Few Roma have bank accounts, rental agreements or utility bills, which are standard requirements as evidence of residency, income and means. This is because the Roma tend to live as part of large extended families within the same area and often move from family to family, which is in keeping with their cultural norms and traditions.

In relation to **experience**:

- Overall the findings point to the existence/prevalence of both individual and structural discrimination faced by the Roma across a number of areas.
- Roma feel discriminated against, victimised and harassed in their interactions with a range of state bodies. These bodies include: Local Authorities, FÁS, Health Service Executive, Employment Agencies, and the Gardaí. When asked if, when dealing with organisations and public bodies, 90% overall felt they had been discriminated against, with 100% of female respondents feeling discriminated against.

- Many of the Roma who participated in this research expressed difficulties when trying to rent private accommodation; experiencing discrimination and racism from landlords.
- Roma men are discriminated against by employers. This makes it difficult to attain and retain work and creates a knock on effect where all other rights and entitlements, for example access to social protection, begin to fall, leaving members of the community at high risk of poverty and destitution.
- Roma women experience unique and multiple barriers to accessing employment, both from within and outside their communities. The findings of the questionnaires indicate that an appalling 100% of Roma women experienced difficulties in accessing goods and services.
- Roma women can be quite isolated from Irish society, thus they very often have poor English skills. This means they are often ill-equipped to engage in employment outside the home. Begging is prevalent amongst Roma women as they often have no alternative sources of income.
- Roma women are very much victims of labelling and stereotyping, and this contributes to their marginalisation.
- Many Roma women not only face the challenges of discrimination in majority society but also experience gender-based discrimination internally in their own communities.

In relation to **identity**:

- When interacting with state authorities such as the Department of Social Protection Roma are interacting with a body whose rules and regulations are governed by Irish and Western European cultural norms and traditions and it is here that two cultures collide. This causes difficulty for the Department as the community cannot conform and hardship for the community because of its inability to conform.
- As a visible community on the margins of society, the Roma are expected to adapt and conform to Irish societal norms, whilst facing considerable barriers in accessing employment, social protection and housing, all of which are essential elements for a community to integrate and adapt to life in the host country. The fact that the Roma engage in what can be considered socially unacceptable behaviour such as begging and petty theft, both of which are driven by poverty and deprivation, bolsters this notion of the Roma as 'unadaptable'.

The **Tipperary Roma Health and Accommodation Project monthly report** of interviews with 57 Roma Families, August 2023 by Gina Miyagawa, identifies issues of situation and experience.

In relation to **situation**:

- 64% of the Roma families/individuals interviewed to date are homeless, with a further 66% at risk of becoming homeless and a further 14% not knowing if and when it will happen.
- 80% of Roma families live in insecure accommodations, with 70% sharing their house/apartment with at least one individual or one family (57%) who is currently homeless. 43% are sharing their house with two other families.
- 70% of the accommodations of the families interviewed are damp with visible black mould on the walls. 82% of those interviewed have only one bathroom and one toilet in the house, with up to 8-10 people sharing one bathroom or toilet.

- 35% have been issued an eviction notice while the remaining 53% have been told to move out but they cannot secure a rental accommodation. 9% of families can no longer afford to pay their rent.
- 39% are the official tenants while the remaining 61% are couch surfing or living with family members in severely overcrowded accommodations. Of those only 34% have rental agreements/contracts, while 21% are squatting in unsuitable accommodations.
- 21% of those interviewed so far have been accepted on the housing list and awarded a HAP package, however, none of the families are able to secure accommodation under the HAP scheme.
- 8% of those families have applied for social housing four or five times before they got accepted on the housing list, while 2% have applied three times. 52% of the remaining families have never applied for social housing. Of those families accepted on the housing list 31% are waiting for a year or more, 15% are waiting for four years, 23% are waiting for five years or more and 31% are on the housing list for less than a year.
- 88% of those interviewed feel their current living conditions negatively impact their everyday health, causing them to experience depression, anxiety and severe stress.
- 69% of those interviewed are in employment with 51% full-time, 47% part-time and 2% cash in hand.
- 58% of families are in receipt of some form of social protection payment. Of those 27% are on Job Seeker Allowance as they lost their jobs during Covid-19. 24% Disability Allowance, 24% receive Carers Allowance, 8% are in receipt of Family Income Supplement, 5% are on TUS Scheme, 5% are on Supplementary Welfare Allowance, and 5% are receiving One Single Family Allowance.

In relation to **experience**:

- 1% of the households interviewed felt discriminated against when they were seeking homeless accommodation, 16% while seeking privately rented accommodation, 8% landlord refused to accept HAP, 9% while seeking social housing, 24% while seeking employment, 16% in the workplace, 8% when accessing social protection services, 4% when accessing a health service, 11% when accessing a GP.
- 20% of people have experienced racism from their neighbours, 19% from their landlord, 2% from staff in social housing, 6% when engaging with a health care provider, 19% in the workplace, 15% in public spaces and 18% in shops.