

National Strategy on Domestic, Sexual and Gender-based Violence, 2010-2014

Final Review and Proposals for New Strategy

Introduction

- ✓ Please complete the questions below which relate to your area of work or experience.
- ✓ Be specific in your answers referring to particular actions under the National Strategy and to data, evaluations and reviews where possible.
- ✓ A key section of the questionnaire asks you to say what you can do under the next strategy. Actions need to be feasible, do-able and ambitious. Any wish lists under this heading should be labelled as such.
- ✓ The questions are purposefully open-ended. Please be as specific and as comprehensive as possible in your answers.
- ✓ Please remember specific developments or actions in relation to vulnerable or high risk groups, including Travellers, people with a disability, older people, migrants, young people, pregnant women and those involved with substance abuse.
- ✓ Do not expect to fill in each and every subheading; the subheadings are meant to prompt your memory.
- ✓ It is better to spend time developing the comment than agonising over which subheading it should go under.
- ✓ Do not get lost with all the subheadings; there are basically five questions:
 - 1. What was good about the strategy?**
 - 2. What was not good?**
 - 3. Have you any evidence either way?**
 - 4. What do you want to do in the next strategy?**
 - 5. What should others do?**
- ✓ Your submission will be published on the Cosc website with the final review.

Name of your organisation: Pavee Point Traveller and Roma Centre

Positive developments

As a result of actions under the current Strategy what, if any, positive developments have occurred in relation to domestic, sexual or gender-based violence under the following headings:

- 1.1 Victims' experience of state services /
- 1.2 Victims' experience of voluntary sector services

There is very little adequate and comprehensive data about the experiences of Traveller and Roma women in state and voluntary sector services due to data not disaggregated by ethnicity. Anecdotal evidence suggests that some services and individual service providers are adapted to the needs of Traveller and Roma women experiencing GBV. However, there is a lack of consistency with regards to this. This results in Traveller and Roma women's right to safety and protection from being curtailed.

- 1.3 Accountability of perpetrators

- 1.4 Awareness and attitudes

Within Traveller and Roma communities:

There is some progress with the levels of awareness of GBV within the Traveller community, particularly among local Traveller Primary Health Care Projects, which work with Traveller women on the ground. Accessible information materials for people with limited literacy and/or language barriers have been key to increasing awareness.

Awareness raising information sessions with Traveller projects have proven to be extremely effective in raising awareness and changing attitudes regarding GBV. While labour intensive, they allow for the in-depth exploration of GBV within a dynamic group environment, which is a powerful method in changing attitudes and creating awareness. It is next to impossible to evaluate to what extent the awareness has transferred to the wider community. This is due to lack of resources to undertake proper evaluation as well as lack of data disaggregated by ethnicity in services.

Young Traveller women tend to have better awareness about GBV and services and supports due to increased levels of literacy and computer skills. However, significant gaps remain and more resources need to be allocated to undertake work with young Traveller women and men, particularly in the context of Travellers and Roma marrying at a young age.

Service providers:

The level of awareness about issues affecting Traveller and Roma women remains relatively low among service providers. However, there is evidence of some positive developments, particularly through engaging in consultations and awareness raising sessions. However, the effects of these remain short term and limited without good practise guidelines being incorporated into services' policy and practise.

1.5 Prevention

There are large gaps in preventative initiatives within Traveller and Roma communities. The majority of initiatives are targeted at supporting Traveller and Roma women who are already subjected to domestic and sexual violence rather than engaging in initiatives, which aim towards the prevention of GBV.

1.6 Policy making or service planning

There are some positive developments with regards to the inclusion of Travellers in board of management in GBV services. Overall, significant gaps remain in policy making and service planning.

1.7 Research or data collection

1.8 Structures or processes to support the strategy (consultation, meetings, six monthly review reports etc.)

Pavee Point welcomes the inclusion of members of the Traveller community in the structures and processes of the development and implementation of the Strategy. Consultation and participation of Travellers and Roma remains crucial in order to make policies and services more effective and adequate for Traveller and Roma women.

1.9 **Outside the Strategy** what, if any, have been the positive developments in relation to domestic, sexual or gender-based violence, generally or under any of the categories above, in the period 2010-2014?

Local and national Traveller organisations are willing and eager to address GBV within the Traveller community and are seeking advice, support, and resources, which would equip them with this work. However, Traveller organisations have been subjected to disproportionate funding cuts since 2008 under the guise of austerity.¹ This has had a negative impact on the ability of both national and local Traveller organisations to engage in preventing GBV and supporting women affected by GBV.

Under the current Strategy, it became possible to initiate work around GBV with Roma communities. However, this remains at an initial stage and requires further attention and human resources in the next strategy. It is part of EU Member States requirement under the EU institutions to address the exclusion of Roma from all services and policy making.² This creates obligations to explicitly include Travellers and Roma in all relevant strategies, including the National Strategy on domestic, sexual and gender-based violence, and release sufficient funding for this work.

¹ Pavee Point (2013) *Travelling with Austerity: Impacts of cuts on Travellers, Traveller Projects and Services* available at: <http://paveepoint.ie/sites/default/files/uploads/2013/04/Pavee-Point-Austerity-PDF-1.pdf>

² This recommendation is in line with recommendations by the EU institutions, which have targeted Travellers and Roma as vulnerable groups under various EU strategies, including Europe 2020 and the EU Framework for National Roma Integration Strategies up to 2020.

Undesirable developments

As a result of actions or inaction under the current Strategy what, if any, undesirable developments have occurred in relation to domestic, sexual or gender-based violence under the following headings

- 2.1** Victims' experience of state services /
- 2.2** Victims' experience of voluntary sector services

Although services are working to become more inclusive of minority ethnic groups, barriers to equality of access and outcome remain for Traveller and Roma women. As a result, Traveller and Roma women continue to avoid accessing services, particularly state services.

Traveller women traditionally have accessed local refuges for respite and support as they have built up trust in these services. However, they are often not aware of helplines, outreach and counselling and local domestic violence services. From our knowledge, very few Roma women in particular are accessing services and supports. The persistent barriers need urgent attention in the new strategy, particularly through ensuring positive action measures to safeguard that vulnerable and marginalised women have access to mainstream services.

Racism, discrimination and negative treatment

Travellers and Roma experience racism and discrimination at both individual and institutional levels. Examples at institutional level include being subjected to racist abuse when accessing goods and services and being told to 'go home' when trying to access a support service. In the past year alone, numerous anti-Roma and Traveller statements have been made by judges with no accountability for these actions. Traveller and Roma women have reported that they are particularly reluctant to seek the protection of the Gardai as they fear that reporting will result in discriminatory attitudes and treatment, including particular harsh treatment of their husbands. This situation contributes to reluctance to disclose violence or seek help.

Our Geels Health study showed a high level of mistrust of mainstream health services amongst the Traveller community. The level of complete trust by Travellers in health professionals was only 41% as compared with a trust level of 82% by the general population. Over 40% of Travellers had a concern that they were not always treated with respect and dignity. Over 50% of Travellers had concerns about the quality of care they had received when they engaged with services.³ This level of mistrust has implications for Traveller women subjected to GBV, as many women would confide GBV to a GP or a mainstream health service.

Travellers and Roma have a particular fear that disclosing and seeking support from social workers and service providers will result in their children being taken into care. The National Crime Council Report in 2005 identified that disproportionate numbers of Traveller children were being taken into care.⁴ Recent report by Pavee Point

³ Kelleher, C et al. (2010) *Our Geels All Ireland Traveller Health Study*, University College Dublin, Available at: <http://paveepoint.ie/travellers-and-issues/traveller-health/our-geels-health-study/>

⁴ Watson, D. & Parsons, S., (2005) *Domestic Abuse of Women and Men in Ireland: report of the National Study of Domestic Abuse*, National Crime Council, available at: http://www.esri.ie/pdf/BKMNEXT056_Domestic%20Abuse.pdf, p160

highlights that the underlying reason for child protection concerns in Roma families in Ireland is linked to poverty and destitution rather than child neglect and abuse.⁵ However, there are serious concerns and evidence with regards to racial profiling by authority figures and illegitimate removal of Roma children from families. A special inquiry report by the Ombudsman for Children has found that ethnic profiling played a role in the removal of Roma children from their parents in two high profile cases in 2013. This has contributed to a heightened fear of authorities among Traveller and Roma women since the events unfolded.⁶

It is imperative to address anti-Roma and Traveller prejudice and racism in services working in the area of GBV. This work needs to educate services about the human rights context of Traveller and Roma women- the poverty and marginalisation that result from racism and discrimination and their effect on a woman's ability leave a violent relationship. Much work remains to be done in the area of challenging racist stereotypes, attitudes and practises, and persistent myth that GBV would be more common in Traveller and Roma communities. There is a particular need for this work to be undertaken with court services, An Garda Síochána and social workers.

Inaccessible information

The accessibility of information about GBV and GBV services continues to be an issue among Roma and Traveller women, who might not have literacy or English language skills. Information materials and forms used by services tend to be inaccessible and not all services use suitable translation/interpreter services.

There are reported instances of anti-Roma attitudes and racism among translators, which have led to a reluctance to translate accurate information and subjecting Roma women to racist abuse. Roma women have also reported instances where children or other relatives have been used to translate between a woman and a service provider. Needless to say, this practice is highly inappropriate and imposes significant barriers to disclosing violence.

Accommodation

Accommodation remains a significant issue for Traveller and Roma women who experience GBV, including crisis refuge and transitional and supported accommodation opportunities. There is a need for a range of options for women and their children who are fleeing GBV. Persistent under-funding and cumulative cuts in the past years have greatly impacted on the capacity of authorities and organisations to respond to increasing demand. In particular, women and their children are being turned away from crisis refuge protection because the refuge is full or there is no refuge in their area. The current practice of referral to homeless and B&B provision as an alternative is not suitable for any woman fleeing a violent relationship.

Refuge provision has largely focused on communal living. In particular for Traveller women living away from their community, communal living in a refuge can be extremely difficult and place further stress on a vulnerable family. While there is a shift towards independent units, the number of family units in refuges remains low. There is also a need to specifically look at the accommodation needs of Traveller

⁵ Pavee Point (2012) Roma Communities in Ireland and Child Protection Considerations. available at <http://paveepoint.ie/sites/default/files/uploads/2010/10/Roma-Communities-in-Ireland-and-Child-Protection-Considerations1.pdf>

⁶ The report by the Ombudsman is forthcoming.

women and their children on site, including permanent and transient halting sites and group housings schemes, and to explore the possibility of community based support initiatives within the context of domestic violence.

Access to legal protection

The effectiveness of current legislation and the criminal and civil justice system to prevent, investigate and protect women against domestic and sexual violence has been seriously challenged by research commissioned by Women's Aid⁷ and Amnesty International⁸. These reports highlight inconsistent responses from the Gardai, long delays in accessing court orders and inadequate enforcement, the adversarial nature of the court system and low conviction and imprisonment rates. These issues affect all women. Overall, there needs to be greater accountability of perpetrators and a stronger legal system. Ultimately, the person and children affected by domestic violence should not have to leave their home and community and provisions in the legal system should reflect this.

There are particular issues affecting Traveller and Roma women. For instance, there are reports of inconsistent responses by Gardai in cases of domestic violence in Traveller sites. These include reluctance and significant delays in responding to calls by Traveller women under violence attack by their partner (up to two hours) and removing the perpetrator from site for few hours to 'cool of' before returning the perpetrator back on site. Knowledge of Traveller and Roma ethnicity and culture is needed in order that domestic violence orders are more effective – e.g. the granting of barring or safety orders need to take into account that the perpetrator may remain on site, only moving to another bay.

2.3 Accountability of perpetrators

2.4 Awareness and attitudes

Pavee Point has been working towards creating links with services by providing consultation, information materials and sessions. However, in the context of cut-backs to state services there has been a noticeable decrease in the ability of staff to engage in consultation and awareness raising sessions. There is an urgent need to engage in consultation with state services and provide training for various stakeholders, such as social workers, An Garda Síochána and court services, particularly in relation to anti-racism and cultural awareness training. However, the impact of awareness raising remains limited if principles of equality and anti-racism are not included in the development and implementation of services' policies. The inclusion of good practise guidelines need to be incorporated into the policy and practise of all services.

There is an increased recognition amongst the Traveller community of emotional abuse and financial control as forms of domestic violence and the recognition of the insidious impact that emotional abuse in particular has on a woman. There is also increased recognition of sexual violence as constituting GBV. However, Traveller and

⁷ Kelleher, P. & O'Connor, M., (1999) *Safety and Sanctions: Domestic Violence and the Enforcement of Law in Ireland*

⁸ Amnesty International *Justice and Accountability: Stop Violence Against Women, Summary Report*
Available at: http://www.womensaid.ie/download/pdf/justice_and_accountability.pdf

Roma are still very reluctant to talk about and report sexual violence due to shame and stigma associated with sexual violence.

Research by Pavee Point has highlighted alarming findings in relation to the acceptability of GBV among young Travellers.⁹ The research shows that young Traveller women can often tolerate rape and sexual violence within marriage and feel that they have no choice in this regard. It also highlights that a certain level of acceptance of violence persists within the community both among men and women, and that violence is often considered as a 'normal' part of a relationship.

Young Travellers are more likely to miss out on sex and healthy relationship education in mainstream school due to higher levels of early school leaving, absenteeism, and in some cases parents' refusal to grant consent to attend sex education classes. This contributes to lower level of awareness and acceptability of violence among many Travellers. There is an urgent need to challenge the acceptability of violence within the community by targeting Traveller parents and young men and women. These interventions need to be culturally sensitive and be informed and developed by members of the community themselves. Sex education in schools for children from various ethnic backgrounds needs special consideration in order to be effective.

2.5 Prevention

There is a huge gap in the provision of culturally appropriate community awareness raising and prevention initiatives in Traveller and Roma communities. There is a particular need to extend this work to include young Travellers and Roma and Traveller and Roma men. Engaging with young Traveller and Roma is particularly crucial as members of the communities tend to marry at a relatively young age. This makes it urgent to impact attitudes, behaviours and perceptions underpinning GBV at an early stage before they become strongly ingrained. There is also an urgent demand for resources to address domestic and sexual violence as an issue of gender and gender equality.

Within the context of disproportionate funding cuts to the Traveller sector since 2008 under the guise of austerity, the capacity of Traveller organisations to undertake preventative work remains severely restricted.¹⁰ The only dedicated Traveller and Roma violence against women programme (Pavee Point's Violence against Women Programme) has received cumulative cuts of 20% over the past five years, placing the programme at serious risk of closure. There is an urgent need to develop positive action measures to train and employ Traveller and Roma men in particular to address GBV within the communities. Positive action measures have proven successful in the inclusion of Travellers and Roma in public service, mainstream and community sector employment. The civil service Traveller internship programme 2006-2007 exemplifies this- the placement of Traveller interns in posts in 12 different Government departments was very successful. Despite this, the programme was subsequently cut.

⁹ McGaughey, F. (2011) *A Pavee Perspective- Travellers' Attitudes to Sexual Relationships and Sex Education*, Pavee Point Traveller and Roma Centre.

¹⁰ Pavee Point (2013) *Travelling with Austerity: Impacts of cuts on Travellers, Traveller Projects and Services* available at: <http://paveepoint.ie/sitenua/wp-content/uploads/2013/04/Pavee-Point-Austerity-PDF-1.pdf>

2.6 Policy making or service planning

Pavee Point has been lobbying for changes at policy level, particularly in relation to amending the Habitual Residence Condition and signing and ratifying the Council of Europe Convention on violence against women and domestic violence. The lack of willingness to amend the HRC and sign and ratify the Convention contribute to the on-going vulnerability of Traveller and Roma women to GBV and curtail much of the work done towards preventing and combatting GBV in Traveller and Roma communities.

Compliance with relevant human rights standards, which Ireland has signed and ratified, must be ensured through their inclusion in policy and legislation. These include the International Covenants on Civil and Political Rights and Economic, Social and Cultural Rights; the Convention on the Rights of the Child; European Convention on Human Rights; the Council of Europe Convention on Action against Trafficking in Human Beings; and the General Recommendation 19 of the Convention on the Elimination of all forms of Discrimination Against Women.

There is an urgent need to sign and ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, which makes specific provisions in relation to GBV. If ratified, the Convention would provide the most far-reaching international treaty to address GBV as a violation of human rights. It does so by recognising violence against women as a violation of human rights and a form of discrimination, and by making provisions of state parties to prevent violence, protect victims, prosecute perpetrators, and monitor the implementation of the Convention.

The new strategy on domestic and sexual violence and gender-based violence needs to explicitly include Travellers and Roma as target groups and address the gendered needs of Traveller and Roma women through targeted measures. This is in line with recommendations by the EU institutions, which have targeted Travellers and Roma as vulnerable groups under various EU strategies, including Europe 2020, the Ten Common Principles of Roma Inclusion, and the EU Framework for National Roma Integration Strategies up to 2020.

HRC

While Pavee Point has been working at community and service levels to remove barriers to GBV information and services, these efforts remain ineffective without wider changes at policy level. Interventions for the prevention and protection from GBV remain largely ineffective if women have no access to adequate social protection and exit routes. Currently, the lack of access to basic social protection prohibits Traveller and Roma women from accessing GBV services and leaving violent situations.

Many Roma in particular are not meeting the HRC, which poses a set of criteria that social welfare claimants need to meet to show a connection with the Irish State. Roma can face difficulties with proving a place of residence in cases where they live with an extended family. Endemic discrimination in education and employment makes it difficult to prove a strong pattern of employment. Low literacy levels and language barriers make it difficult to respond to the Department of Social Protection

in a timely manner, and may mean that some applicants do not have all the documentation needed. As a result, many Roma are unable to meet the criteria of the Condition.

The implementation of this policy has a hugely negative and disproportionate impact on Roma. It is a major cause of poverty and acts as a barrier to accessing adequate accommodation, education and healthcare. Women who experience domestic and sexual violence are unable to flee situations of violence without being recognised as habitually resident. Access to refuges and support services is dependent on the ability of the woman to pay or be in receipt of social welfare. Refuges under financial pressure cannot provide for women beyond a short period deemed emergency.

The European Commission against Racism and Intolerance (ECRI) has recommended for the Irish authorities to review the impact of the HRC, but this has still not taken place. Concerns have also been raised by the Special Rapporteur on extreme poverty and human rights. She states that,

This requirement can pose a significant threat to the access to essential services and thus enjoyment of human rights by members of vulnerable groups, particularly people experiencing homelessness, Travellers, asylum-seekers, migrant workers and returning Irish migrants. The Special Rapporteur encourages the Government to review the impact of the condition as a matter of priority.¹¹

Participation in decision making and planning

Travellers and Roma remain largely excluded from any decision making and development and implementation of policy and practice. In 2005 and 2011 the Committee on the Elimination of Racial Discrimination (CERD) put forward a recommendation for Ireland to adopt positive action initiatives in an effort to improve the representation of Travellers and Roma in political institutions. The former Council of Europe Commissioner for Human Rights has also recommended that Traveller and Roma communities should be adequately represented in local councils¹².

The participation of Roma and Traveller women at all stages of development, implementation, and evaluation of GBV policies enhances the quality and effectiveness of policies and services. The active participation of Travellers and Roma has been recognised as essential in ensuring Roma attainment to human rights by the EU institutions.

2.7 Research or data collection

In order for this strategy to result in effective policy and practise it should be based on reliable and comprehensive data. Currently there is little adequate and

¹¹Carmona, Magdalena Sepúlveda, *Report of the Special Rapporteur on Extreme Poverty and Human Rights*, 2012.

¹² Council of Europe (2008) *Report by the Commissioner for Human Rights, Mr Thomas Hammarberg on his Visit to Ireland*, November 2007.

comprehensive data in relation GBV in Roma and Traveller communities due to a lack of data disaggregated by ethnicity. Without adequate data it is impossible to monitor and assess the effectiveness of any measures taken to address GBV in Traveller and Roma communities. The lack of disaggregated data also hampers the recording and monitoring of anti-Roma and anti-Traveller racism and discrimination in services. In order to successfully prevent and combat GBV in Traveller and Roma communities, an ethnic identifier must be introduced across all relevant administrative systems. Careful legal, ethical and practical considerations should be implemented in the collection, analysis and dissemination of data which adhere to a human rights framework.

Collection of data disaggregated on basis of ethnicity within a human rights framework requires:

- A universal question
- Based on principle of self-identification
- Data collected is aggregated and anonymised
- Data is only used for the purpose for which it was collected
- It is available in a timely manner
- It is analysed in consultation with the organisations representing minority ethnic groups

The collection of disaggregated data has been identified as a key factor in improving outcomes for Travellers and Roma and in developing effective policies. The European Commission took up the matter of data collection in its Green Paper on Equality and Non-discrimination;

*The lack of mechanisms to collect data and to monitor trends and progress in Member states currently makes it difficult to assess the real extent of the challenges that exist and to measure the effectiveness of legislation and policies to tackle discrimination...greater availability of quantitative and qualitative data could help to support the development of anti-discrimination policies by establishing baseline positions, identifying where results of inequalities lie and analysing their dimensions. It would also be useful to obtain data in order to track the impact of policy and funding.*¹³

The UN Committee on the Elimination of all Forms of Racial Discrimination in its general recommendation on Roma asked State parties to...include in their periodic reports, in an appropriate form, data about Roma communities within their jurisdiction, including statistical data about Roma participation in political life and about their economic, social and cultural situation, including from a gender perspective.

Furthermore, it is key that a public campaign is conducted to inform people of the reasons of why such data is collected and affirm a commitment to human rights principles and ethical use of such data. Traveller organisations, Travellers and Roma must be central to this process

¹³ Commission of the European Communities, *Equality and non-discrimination in an enlarged European Union*. Green Paper. Brussels, 2004.

2.8 Structures or processes to support the strategy (consultation, meetings, six monthly review reports etc.)

Pavee Point notes that the current strategy relies heavily on a mainstream approach. It is vital to note that mainstreaming does not just happen- it requires a means of assessing how policies impact various groups and taking into account of the needs of various groups. Policies deemed as 'neutral' can lead to indirect discrimination of Travellers and Roma when they impose additional barriers for Travellers and Roma because of their situation. The danger of such strategies is that despite them being designed to promote inclusion, the long-term impact can result in strengthening marginalisation and exclusion. The ultimate aim of policies should be the inclusion of Travellers and Roma in mainstream society through positive action measures. Pavee Point has developed a *Traveller Needs and Impact Assessment Toolkit* to enable effective mainstreaming. We would welcome the opportunity to support its use in the development and implementation of the new strategy.

2.9 Outside the Strategy what undesirable developments, if any, have occurred in relation to domestic, sexual or gender-based violence, generally or under any of the categories above, in the period 2010-2014?

Travellers and Roma remain one of the most marginalised and impoverished communities in Irish society.

- 84% of Travellers are unemployed in comparison to an overall figure of 14%. (Census 2011)
- Traveller mortality rates are three times the national average; life expectancy for Traveller men is 15 years less and for Traveller women 12 years less than the national population; suicide rates are over six times the national average.
- Census 2011 shows that 55% of Travellers leave school before the age of 15. Less than 1% of Travellers go on to third level education.
- Many Roma in Ireland are living in poverty due to a lack of access to any social protection
- Many Roma find it difficult to gain employment due to factors including racism, discrimination and lack of training and formal education

Traveller and Roma women are subjected to further marginalisation due to discrimination based on gender and ethnicity. There needs to be wider acknowledgement achieved about the intersection of ethnicity, gender and socioeconomic position in the context of GBV.

The Government has failed to address the marginalised socioeconomic position of Roma in Ireland, regardless of its commitments under the EU Framework for National Roma Integration Strategies up to 2020. The most recent assessment (2013) of Ireland's National Traveller Roma Integration Strategy by the European Commission has been very critical. Out of 22 criteria, Ireland is deemed to have met just 4. This leaves Ireland in the bottom third in Europe.

Currently, the Strategy has no goals, timeframes, funding or monitoring mechanisms and it failed to include Travellers and Roma in participating in its development. As a result, the Strategy has had very little impact on the situation of Roma in Ireland. The

majority of Roma and Travellers continue to live in poverty and marginalisation, which can place Traveller and Roma women at further risk of GBV.

The pressure to develop a strategy in line with the EU Framework document and the 10 Common Basic Principles on Roma Inclusion will increase, as the European Commission are clear that they will continue strict monitoring of the situation. In December 2013, the European Council has adopted a Recommendation on Effective Roma Integration Measures in the Member States, which is the first EU legal instrument to hold Member States to account for Roma inclusion.

The Evidence

3.1 What actions did you take to evaluate or review the impact of any of the actions under the National Strategy? Please forward copies of any relevant publications or documents.

Barriers to services by Roma and Travellers have been documented in various publications.¹⁴ In addition, Pavee Point engages in on-going consultation with GBV service providers, Traveller organisations and members of Traveller and Roma communities. This allows for the generation of anecdotal evidence but leaves significant gaps in comprehensive evidence in relation to GBV in Traveller and Roma communities. There is an urgent need to ensure disaggregated data based on ethnicity and gender. Without such data, it remains impossible to evaluate and monitor the effectiveness of current policy and practise.

3.2 Are you aware of evaluations or reviews by others of the impact of any actions under the Strategy? Please forward copies of any relevant publications or documents, or contact details of those who undertook the evaluation.

What can be done better in the future?

By you

What specific actions is your organisation proposing to undertake in the context of a new national strategy on domestic, sexual and gender-based violence, in the period 2015-2019, under any of the following categories.

4.1 State and voluntary sector services for victims

Pavee Point continues to be available for;

- consultations with state and voluntary sector services

¹⁴ See for instance, Kelleher, C et al. (2010) *Our Geels All Ireland Traveller Health Study*, University College Dublin, Available at: <http://paveepoint.ie/travellers-and-issues/traveller-health/our-geels-health-study/>; Pavee Point (2012) Roma Communities in Ireland and Child Protection Considerations. available at <http://paveepoint.ie/sites/default/files/2010/10/Roma-Communities-in-Ireland-and-Child-Protection-Considerations1.pdf>

- providing information and support for frontline staff through training
- develop and promote good practise guidelines for such guidelines to be included in services' policy and practise
- combat anti-Traveller and Roma prejudice and racism among services and policy makers

However, this work remains limited in its effect without the inclusion of Travellers and Roma in positions of board of management and working in key positions in state and voluntary sector services. This situation requires positive action measures which ensure the inclusion of Roma and Traveller women in particular in training and employment opportunities in voluntary and state sector GBV services.

4.1 Accountability of perpetrators

Pavee Point continues to lobby for wider structural changes and the introduction of policy and practise, which increase the accountability of perpetrators.

4.2 Awareness and attitudes

Pavee Point continues to raise awareness about GBV with the aim of preventing GBV within Traveller and Roma communities and increasing awareness of relevant services and supports by using appropriate methods.

4.3 Prevention

Pavee Point will engage in particular preventative interventions, which target men and young Traveller and Roma girls and boys.

4.4 Policy making or service planning

4.5 Research or data collection

Pavee Point will promote the inclusion of an ethnic identifier among state and voluntary sector services.

4.6 Structures or processes to support the strategy (consultation, meetings, six monthly review reports etc.)

Pavee Point is committed to support the structures and processes related to the Strategy to ensure that policy and practise is inclusive of the needs and issues of minority ethnic women, including Roma and Travellers.

5. What specific actions is your organisation proposing to undertake for victims generally which will also apply to victims of domestic, sexual or gender-based violence, in the period 2015-2019, under any of the above categories?

By others

What other specific actions should be undertaken in the context of a new national strategy on domestic, sexual and gender-based violence, 2015-2019, under any of the following categories?

Who should undertake these actions?

Please also state, with your reasons, if you believe that there should be no further action by anyone under any heading.

6.1 State services for victims and Voluntary sector services for victims

Wish list:

- ***Examine a one stop-shop option for greater accessibility to services for victims of domestic and sexual violence. This model should take account of the specific needs of Traveller and Roma women.***
- ***Introduce positive action measures to enable Traveller and Roma women to access GBV training and employment opportunities in state and voluntary sector services, including refuges, counselling roles, An Garda Siochana and social work.***
- ***Ensure Traveller and Roma women are represented in board of management of services and in any future Judicial Conduct Committee, particularly in light of the more recent offensive and racist comments by a number of District Court judges.***
- ***Traveller and Roma proof policy and practice in state and voluntary sector services by the inclusion of good practice guidelines.***
- ***Ensure consistent responses to child protection concerns that take into account the socioeconomic and political context of Traveller and Roma women and avoid racial profiling.***
- ***Standardise the development of forms and information materials to being accessible to a wide variety of people across all sectors and services, including ensuring that they are accessible to people with limited literacy and language skills.***
- ***Ensure the use of an appropriate translator with women who may have limited English language skills. Using family members to translate is inappropriate. Also be aware that anti-Roma attitudes are widespread in many countries- a translator from the same country of origin as a Roma client has often led to poor translation service due the translator having anti-Roma bias.***
- ***Ensure further resources are allocated for the provision of refuges that are suitable for a diversity of women- accommodation options should be inclusive of Traveller and Roma women's needs to ensure equality of access and outcomes for Traveller and Roma women.***

6.2 Accountability of perpetrators

- ***Sign and ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence as a matter of urgency to address the current lack of accountability of perpetrators.***

6.3 Awareness and attitudes

6.4 Prevention

Wish list:

- ***Ensure adequate funding for local and national Traveller organisations to undertake GBV prevention and awareness rising at community and service levels.***

6.5 Policy making or service planning

Wish list:

Apply the Ten Common Basic Principles on Roma Inclusion in the development and implementation of all policy and practice

Ten Common Basic Principles on Roma Inclusion:

Endorsed by the Council of Ministers and adopted by the European Commission, the Ten Common Basic Principles on Roma Inclusion provide guidelines for Member States when developing and implementing strategies for Roma and Traveller inclusion.¹⁵ Any integration strategy should therefore explicitly include Travellers and Roma, and be underpinned by the Ten Common Principles, including;

- **Constructive, pragmatic and non-discriminatory policies:** Such policies are relevant and appropriate to the situation on the ground. This means that the development, implementation and evaluation of policies and services should not be based on preconceptions.
- **Explicit but not exclusive targeting** refers to the incorporation of Roma and Traveller focused interventions in broader policy initiatives. As a result, Travellers and Roma should be recognised as one of the vulnerable and marginalised groups in Irish society, and explicitly included in all strategies.
- **Aiming for the mainstream:** despite policies and initiatives being designed to promote inclusion, the long-term impact can result in strengthening segregation. Policies deemed as 'neutral' can lead to indirect discrimination of Travellers and Roma when they impose additional barriers for Travellers and Roma because of their situation. The ultimate aim of policies should be the inclusion of Travellers and Roma in mainstream society.
- **Awareness of gender dimension** emphasises the need to recognise the socio-economically and politically disadvantaged position of Traveller and Roma women in comparison to Traveller/Roma men and non-Roma women. Traveller and Roma women have a crucial role in the promotion of their own inclusion and tackling issues related to multiple discrimination based on their gender and ethnicity.
- **Transfer of evidence-based policies** emphasises the importance of collecting socio-economic data to feed into the development, implementation and monitoring of Roma and Traveller inclusion policies.
- **Use of European Union instruments:** there are a number of European Union instruments for Member States to use in ensuring Traveller and Roma

¹⁵Council of Europe (nd) The 10 Common Basic Principles on Roma Inclusion, [online] Available from:
http://www.coe.int/t/dg4/youth/Source/Resources/Documents/2011_10_Common_Basic_Principles_Roma_Inclusion.pdf.

inclusion. These consist of legal, financial and coordination instruments, including the Racial Equality Directive, Framework Decision on Racism and Xenophobia, European Social Fund, and European Regional Development Fund.

- **Involvement of civil society:** Traveller and Roma inclusion policies need to be developed, implemented and evaluated in close cooperation with civil society, including researchers, NGO sector, and social and community partners. This enables the dissemination of knowledge and expertise, and allows for the generation of public debate and accountability in policy process.
- **Active participation of Roma:** Roma and Traveller participation at all stages of policy development, implementation, and evaluation is required in order to enhance the quality and effectiveness of policies.

6.6 Research or data collection

Wish list:

- ***Ensure the production of up-to-date research in the area of GBV, which includes issues and needs of minority ethnic women, particularly Traveller and Roma women.***
- ***Undertake research with a specific focus on the intersection of poverty, ethnicity and GBV and exploration of the feasibility of appropriate models for enabling victims/survivors experiencing poverty to exit violence.***
- ***Introduce an ethnic identifier across all administrative systems in order to develop responsive and adequate policies, and to monitor and assess their impact on Traveller and Roma communities. The application of an ethnic identifier needs to take place within a human rights framework.***

6.7 Structures or processes to support the strategy (consultation, meetings, six monthly review reports etc.)

7.1 What specific actions should be undertaken for victims generally which will also apply to victims of domestic, sexual or gender-based violence, in the period 2015-19, under any of the above categories?

Wish list:

- ***Traveller and Roma proof all legislation and policy.***
- ***Invest resources and conduct an impact assessment of the Habitual Residence Condition, in particular in relation to ethnicity and gender.***
- ***Amend / repeal legislation and policy which has a disproportionately negative impact on Travellers and Roma – in particular the Habitual Residence Condition.***

7.2 Who should undertake the actions mentioned above?

All state and voluntary sector services and the Irish Government.

And finally

8. Please make additional comments, if any, here.

The current Strategy fails to include prostitution as a form of GBV and include a clear strategy to addressing prostitution and supporting victims of prostitution. The European Parliament has recently passed a resolution acknowledging all forms of prostitution as violence and abuse of women and girls. It is imperative that the Irish Strategy reflects this and explicitly includes prostitution as a form of GBV. This allows for the victims of prostitution to be approached as such, as victims, rather than as criminals as it often is the case.