

To: The Príomh Comhairleoir and Each Member of Limerick City and County Council

RE: Mayors Report to Elected Members on the submissions received as part of the public consultation on the Draft Traveller Accommodation Programme 2025 – 2029

20th November 2024

A Chara,

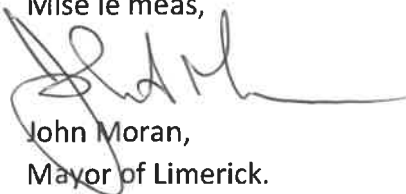
In accordance with Section 11 of the Housing (Traveller Accommodation) Act 1998 I enclose herewith a copy of the Mayor's Report on the submissions received as part of the public consultation on the Draft Traveller Accommodation Programme 2025 – 2029. A copy of the draft Traveller Accommodation Programme 2025-2029 as amended following discussion at the Limerick Traveller Accommodation Consultative Committee meeting is also enclosed. For ease of reference amendments are in red print.

Limerick City and County Council is committed to the provision of accommodation for members of the Travelling community. I would like to thank those who made submissions and thank members of the Local Traveller Accommodation Consultative Committee for their work.

The adoption of the Traveller Accommodation Programme is a reserved function of Council.

I recommend to the members that the Draft Traveller Accommodation Programme 2025-2029 (as amended) be adopted. I am confident this Programme will further enhance the delivery of Traveller accommodation in Limerick City and County.

Mise le meas,



John Moran,
Mayor of Limerick.

Ceanncheathrú Chorporáideach, Cé na gCeannaiyhe, Luimneach
Corporate Headquarters, Merchant's Quay, Limerick

Report on submissions received on the Draft Traveller Accommodation Programme for Limerick for the period 2025- 2029

Introduction

In accordance with section 7 of the Housing (Traveller) Accommodation Act 1998 and a direction from the Minister for Housing, Local Government and Heritage, Limerick City and County Council is required to adopt a new Traveller Accommodation Programme for the period 2025 - 2029. Following the completion of an assessment of need and a pre-draft consultation process, a draft accommodation programme was prepared and considered by the Local Traveller Accommodation Consultative Committee.

The Draft Programme was then made available for public inspection on 26th July 2024 and submissions were invited. The closing date for submissions was the 20th September 2024. Pursuant to Section 11 of the Act, I submit to the elected members my report, which summarises the submissions received, the source of the submissions, my response to the submissions and any proposed changes to the Draft Programme. Also enclosed find the Draft Accommodation Programme (as amended) for your consideration. The adoption of this Programme is a reserved function.

Submissions were received from the following:

- CENA
- Limerick Traveller Network (LTN)
- Heather Rosen
- Bill Casey, Philomena Casey and Savannah Casey
- Martina Casey and Margaret Casey

1. Name / Group	Limerick Traveller Network
Submission	Response
1.1 LTN and its Reps seeks improved consultation with the Council leading to improved outcomes in Traveller accommodation.	LTN will now sit on the Local Traveller Consultative Accommodation Committee. The Council Traveller Accommodation Unit (TAU) will continue to actively engage with the LTN.
1.2 LTN are asking that resources are ringfenced by the TAU to fund LTN / Cena to carry out further analysis of data to feed into the TAP needs assessment, to help provide a more accurate account of need.	All Travellers who are approved for social housing were contacted in the preparation of this programme by LCCC. LCCC are satisfied that the actions taken within the Social Housing Assessment which includes an 'ethnic identifier' and allows for the selection of multiple accommodation types and areas of choice as well as the annual estimate of accommodation of Traveller families (as directed by DHLGH) accurately captures need. This data is presented within Section 2.3 the draft TAP. LCCC will examine possible funding sources.
1.3 LTN are stating that social housing is not the preference of the vast majority of Travellers living on sites in Limerick City.	LCCC coordinated the data from the Assessment of Social Housing Need and wrote separately to all Traveller housing applicants asking for their housing preference. LCCC is satisfied that the data as documented in the TAP reflects the preference of Travellers but for clarity the following line will be added to the TAP – The Limerick Traveller Network state that from their research generic social housing is not the preference of the vast majority of Travellers living on sites in Limerick City. P 22
1.4 LTN state concern that the draft TAP states that permanent accommodation will be given priority over the provision of sites.	Draft TAP is stating, that the provision of sites with limited facilities as defined in Section 29 Housing (Traveller Accommodation) Act will

	<p>be considered in exceptional circumstances as determined by the council.</p> <p>This is referring to persons who may park illegally on the roadside. The aim of the TAU would be to firstly try to provide the applicant with permanent accommodation in Traveller specific accommodation or generic housing, whichever is their preference taking into account what accommodation is available at the time.</p>
<p>1.5 LTN note the number of applicants waiting for more than 10 years for accommodation. They are requesting the numbers waiting more than 15 + years and 20 + are highlighted.</p>	<p>Section 2.3 Table 8 of the draft TAP sets out length of time on waiting list with the category 7+ years being the longest. This is in line with the data as presented in the Council's Housing Delivery Action Plan 2022-2026.</p> <p>Table 8 has been amended to reflect 15+ . There are no 20+ applicants. P18</p>
<p>1.6 LTN are seeking to change the draft TAP with regard to "the purchase of single instance houses will only be considered in exceptional cases where special needs exists and appropriate accommodation cannot be sourced within the local authority housing stock or via the available housing supply options " .</p>	<p>This is a statement of policy and is designed to clearly indicate that only exceptional cases will be considered. It is impractical to think that LCCC can purchase single instance houses for the general Traveller population.</p>
<p>1.7 LTN state that homelessness is at a crisis level in Limerick within the Traveller Community.</p>	<p>Section 2.3 Table 11 in the draft TAP highlights the numbers of Travellers in Homeless Services as well as overall Homeless in Limerick.</p> <p>LCCC recognizes the added difficulty experienced by Travellers in regard to Homelessness.</p>
<p>1.8 LTN calls for the end of use of legislative powers by the Council to remove unauthorized dwellings.</p>	<p>Unauthorised dwellings will only be removed in accordance with the law.</p>

	<p>The Plan states that unauthorized encampments will be assessed in accordance with the requirements of the relevant legislation as appropriate. Prior to families being asked to move or vacate an area, which is not authorized for caravan parking, the Homeless Action Team in conjunction with the Traveller Accommodation Unit will investigate the circumstances of the family to establish if they are included in the accommodation programme. While applicants are waiting for accommodation, the Homeless Action Team and the Traveller Accommodation Unit will support applicants. The appropriate support and guidance will be provided during this period to help applicants access homeless services.</p>
<p>1.9 LTN support the continuation of the Caravan Loan Scheme.</p>	<p>Noted and welcomed. Such schemes are provided and funded by the Dept of Housing, Local Government and Heritage. LCCC await confirmation as to when a new scheme will be operational.</p>
<p>1.10 LTN request that consideration be given to the building of modular units.</p>	<p>Noted. LCCC currently in the process of procuring modular units for Rathkeale Halting Site.</p>
<p>1.11 LTN calls on local authorities to use planning legislation for land requisition purposes to provide Traveller specific accommodation and additional space for the carrying out of legitimate economic activity supports.</p>	<p>Noted. Compulsary purchase orders may be used as appropriate for Traveller accommodation.</p>
<p>1.12 LTN call for the end of over reliance on the rented sector and HAP and RAS for the Traveller community.</p>	<p>Noted. LCCC recognize the difficulties experienced by Travellers in sourcing HAP properties. P10</p>

1.13 LTN asks for the increased use of Approved Housing Bodies to provide Traveller accommodation. LTN would particularly like to promote the increase in use of CENA in Limerick City who are a Traveller Approved Housing Body.	TAU work with all Approved Housing Bodies to provide accommodation to Traveller Housing Applicants.
1.14 LTN ask that the Council commit to the next TAP to employ Traveller staff within the TAU and to consider the role of Traveller caretakers and Traveller tenancy officers.	There are currently no vacancies in the TAU. Should vacancies arise they are publicly advertised and it is open to all applicants to apply.
1.15 LTN ask that in the next TAP the Council clearly state its understanding of the importance of family and extended family in Traveller culture and that they also take into consideration family compatibility when providing accommodation.	LCCC consider the importance of family and extended family within Traveller culture. Capital projects will be designed to meet the needs of extended families where possible.
1.16 LTN ask that cultural awareness training be compulsory to all TAU staff and members of the LTACC.	TAU staff have already received equality training. Cultural awareness and equality training will be offered to all LTACC members and all members will be encouraged to avail of this training.
1.17 LTN ask that the accommodation needs of women from the Travelling community seeking to escape domestic violence would be prioritized in the next TAP and mechanisms put in place to provide safe long term accommodation solutions.	Noted and welcomed.
1.18 LTN request that the Council create a clear plan in consultation with the Traveller community in the regeneration areas of the City as to how they will benefit from the regeneration programme and state in the next TAP how this will be monitored and evaluated.	The TAP outlines accommodation proposals for the 3 sites adjacent to the regeneration area. Progress reports will be given on a quarterly basis to the LTACC as set out under 1.19.

<p>1.19 LTN support increased accountability , monitoring and governance of Traveller accommodation and penalties for failure to deliver satisfactorily within the budgets that are issued.</p>	<p>Capital budgets are determined based on projects approved by the DHLGH. During the lifetime of the last programme over €11 million was spent by Limerick City and County Council on Traveller accommodation.</p> <p>A report on all works will be provided each quarter to the Local Traveller Accommodation Consultative Committee.</p> <p>LCCC will provide annual report to LTACC and Home and Social Development SPC on funding approved for Capital works for Traveller Specific Accommodation construction & acquisitions together with expenditure</p> <p>LCCC will provide an annual report to LTACC and Home and Social Development SPC on funding approved for improvement to Traveller Specific Accommodation and expenditure to date</p> <p>LCCC will provide annual report to LTACC and Home and Social Development SPC on capital spending on non- Traveller specific housing</p> <p>LCCC will provide annual report to LTACC and Home and Social Development SPC on revenue funding on Traveller specific housing and recoupment from DHLGH.</p>
<p>1.20 LTN recommend the development of infrastructure when creating and developing Traveller sites.</p>	<p>This will be considered in the development of individual projects subject to site suitability and funding.</p>

2. Name / Group :	CENA:
Submission	Response
2.1 CENA ask for full engagement with specific Traveller families with a view to assessment of individual needs in the long term, whether resulting in the acquirement of specific properties or in the development of group housing.	Noted and welcomed.
2.2 CENA request that planning, designing and developing new accommodation, is carried out in partnership with Traveller families for the provision of Traveller appropriate accommodation.	LCCC consult with Traveller families in the development of new Traveller accommodation.
2.3 CENA requests a more in-depth assessment of Traveller accommodation needs to be carried out by outreach workers in order to provide a solid foundation for strategic planning for future TAPs.	All Travellers who are approved for social housing were contacted in the preparation of this programme by LCCC. LCCC are satisfied that the actions taken within the Social Housing Assessment which includes an 'ethnic identifier' and allows for the selection of multiple accommodation types and areas of choice as well as the annual estimate of accommodation of Traveller families (as directed by DHLGH) accurately captures need. This data is presented within Section 2.3 the draft TAP. LCCC will examine possible funding sources.
2.4 CENA wish to point out specific challenges involved in Traveller homelessness. CENA are prepared to enter into a Service level agreements to undertake a joint structured programme to manage Traveller homelessness.	Noted and welcomed.

2.5 CENA support other Approved Housing Bodies becoming actively involved in the delivery of accommodation for Traveller applicants. Cena state they now cooperate with a number of Approved Housing Bodies who are committed to a partnership approach.	Noted and welcomed.
3. Name / Body	Heather Rosen – Private Citizen
Submission	Response
3.1 Ms. Rosen queries the Council's Allocations policy and the right to appeal a decision. She mentions not knowing that you can appeal a decision and where to send the appeal.	The TAU staff inform applicants and tenants of all their rights and will guide applicants and tenants on how to appeal decisions.
3.2 Ms. Rosen queries the implementation of the Homeless Policy Document and criteria for eligibility for homeless supports. 3.3 Ms. Rosen considered that a site for temporary emergency provisions needs to be identified for at least several of the roadside families.	LCCC implements the policy documents as appropriate. The TAP states it is the policy of the Council that priority will be given to the provision of permanent accommodation and that the provision of sites with limited facilities as defined in Section 29 Housing (Traveller Accommodation) Act will be considered only in exceptional circumstances as determined by the Council.
4. Name / Body	Bill, Philomena and Savanah Casey
4.1 Provision for extended family.	This is not an appropriate platform to address these issues and the family in question will be contacted to arrange an appointment.
5. Name / Body	Martin and Margaret Casey
5.1 Provision for extended family and maintenance issues.	This is not an appropriate platform to address these issues and the family in question will be contacted to arrange an appointment.

In addition following review of the draft Traveller Accommodation Programme 2025-2029 it is recommended that the following modification is made to the draft programme.

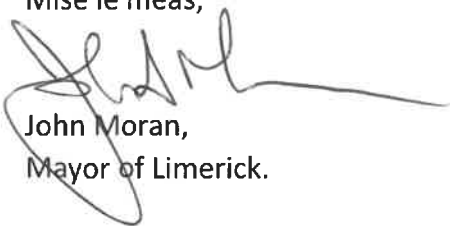
1) A paragraph on Youth Homeless be inserted after HOMELESSNESS

YOUTH HOMELESS

- The Housing for All – Youth Homeless Strategy 2023-2025 is 3-year strategy working towards ending homelessness for young people aged 18-24 through prevention and exits; and improving the experience of young people accessing emergency accommodation
- In particular the Housing for All – Youth Homeless Strategy 2023-2025 identifies young Travellers as one of the six vulnerable cohorts at risk of homelessness. Early intervention and interagency collaboration involving Local Authorities, Local Traveller Accommodation Consultative Committee, Traveller Representative Groups and the HSE Regional Traveller Health Forum is essential to prepare young Travellers to find their preferred accommodation and to access any necessary supports in the community.
- The Traveller Accommodation Unit of Limerick City & County Council will continue to ensure that there is ongoing early liaison with community health care workers and the Local Authority regarding the housing needs of young Travellers. Housing preferences and options, both for temporary, transitional and permanent housing, should be explored to avoid young people accessing mainstream homeless services.
- The Homeless Section and the Traveller Accommodation Unit will engage with young Travellers who are at risk of homelessness and provide guidance towards mediation, tenancy sustainment and other available supports as necessary.
- The Local Authority will provide regular training to community health care workers to enable them to assist young Travellers to complete and submit a complete social housing support application at the earliest opportunity.

It is proposed to proceed with the draft Traveller Accommodation Programme 2025-2029 as amended.

Mise le meas,



John Moran,
Mayor of Limerick.

Traveller Accommodation Programme

Limerick City and County Council

2025-2029

DRAFT

November 2024



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

Table of Contents

Introduction	1
1. Section 1	2
1.1 Legislative Background	2
1.2 Local Government Structures	3
1.3 Equal Status Act 2000 – 2018	4
1.4 Policy	6
2. Section 2	12
2.1 2019-2024 Programme Outcomes	12
2.2 Existing Accommodation Provision	13
2.3 Assessment of Housing Need	15
2.4 Projected Need	22
3. Section 3	22
3.1 Performance, Monitoring and Measurement	22
4. Section 4	23
4.1 Strategy	23
4.2 Proposed Measures	26
4.3 Generic Housing	27
4.4 Traveller Specific Accommodation	27
5. Section 5	33
5.1 Conclusion and review	33
6. Appendix – Submissions	34

List of Abbreviations

HAP	Housing Assistance Payment
LCCC	Limerick City and County Council
LCDC	Local Community Development Committee
LTACC	Local Traveller Accommodation Consultative Committee
NGO	Non-Governmental Organisation
RAS	Rental Accommodation Scheme
SICAP	Social Inclusion Community Activation Programme
TAP	Traveller Accommodation Programme

Introduction

The provision of Traveller Accommodation is a key element of the functions of Housing Authorities and this programme has been prepared in accordance with legislative requirements as set out in the Housing (Traveller Accommodation) Act 1998. In March 2017, the Irish Government announced formal recognition for Travellers as a distinct ethnic group within the state.

Due regard has also been given to all relevant statutory and national policy requirements in the preparation of this programme. The National Housing Policy, “ **Housing for All – a New Housing Plan for Ireland 2021 -2030** ” and other national guidelines will impact on the delivery of all local services, including Traveller accommodation.

Limerick City and County Council will be referred to as “the Council” in this programme.

It is envisaged that this accommodation programme will lead to improved accommodation circumstances for those Traveller families that are assessed as having an accommodation need. The success of the programme will not only be dependent on available funding but also on the positive engagement of all key stakeholders, including members of the Traveller community. The Council will work in collaboration with relevant agencies and Travellers to ensure a co-ordinated delivery of services with the aim of achieving positive outcomes for all involved.

In accordance with Section 10 of the 1998 Act, the Minister has directed that the next Traveller Accommodation Programme will cover the period from January 2025 to 31st December 2029.

The Minister has specified that the latest date for the adoption of the accommodation programme is the 31st December 2024.

Section 1: Legislation, Local Government Structures and Policy

1.1 Legislative Background

The accommodation programme for the period 2025-2029 has been prepared in accordance with the provisions set out in the Housing (Traveller Accommodation) Act 1998.

The programme will be implemented having regard to all relevant housing and other legislation and will take into consideration the requirements of relevant policies and departmental guidelines and circulars.

It is the intention of Limerick City and County Council when implementing the accommodation programme, that where possible agreement by all stakeholders will be achieved. In any event, actions implemented will be on the basis that they meet the accommodation needs of families having regard to local community needs and circumstances.

The Housing (Traveller Accommodation) Act, 1998 provides a legislative framework to support the Government's commitment to the provision of Traveller accommodation. The Act amended the Housing Acts, 1996-1997 and the Local Government (Planning and Development) Act 1963 to 1998. The purpose of the Act and subsequently the Accommodation Programme is to put in place the necessary procedures, resources and facilities to ensure the accommodation requirements of Travellers are strategically addressed by Housing Authorities.

A summary of the main provisions of the Housing (Traveller Accommodation) Act 1998:

- Each local authority is required to prepare a 5-year programme of Traveller Accommodation for their area.
- The adoption of the Traveller Accommodation Programme is a reserved function. In the event that the Council fails to adopt the Programme within the timeframe specified by the Minister, the Mayor, shall by order, adopt the programme.
- The local authority is required to provide appropriate notification to, and consultation with, the public in respect of the preparation and adoption of the programme.
- The local authority is required to take reasonable steps to secure the implementation of the Traveller Accommodation Programme.
- The planning authority is required to include objectives concerning Traveller Accommodation plans in its development plans.
- The establishment of the National Traveller Accommodation Consultative Committee on a statutory basis to advise the Minister on aspects of Traveller accommodation.

- The establishment of the Local Traveller Accommodation Consultative Committee on which local authority members, officials and Travellers are represented.
- The Act extends statutory backing for the provision of financial support available to local authorities and the voluntary sector for provision and management of Traveller accommodation.
- To apply relevant provisions of the Housing (Miscellaneous Provisions) Act, 1997 in particular relating to anti-social behaviour on Traveller Specific Accommodation provided by the local authority or by voluntary bodies with the assistance of the local authority.
- The Act improves the powers of local authorities to deal with unauthorized temporary dwellings where alternative serviced accommodation is available, or within one mile of existing accommodation regardless of whether alternative accommodation is available.

1.2 Local Government Structures

The Local Government Reform Act 2014 led to significant changes in the delivery of Local Authority services in Limerick and led to the establishment of a unitary authority for Limerick. This new local government structure provided for increased co-ordination of the delivery of Traveller accommodation and associated supports for members of the Traveller community in Limerick. In addition to accommodation, related issues the new structures also provide for a strengthened strategic approach to community supports, including the Traveller community, in a number of programmes overseen by the Local Community Development Committee (LCDC). These included the Social Inclusion Community Activation Programme (SICAP), health, well-being programmes under Healthy Limerick, and Sláintecare Healthy Communities and local community grant schemes such as the Community Enhancement Programme. The Social Inclusion and Community Activation Programme (SICAP) in Limerick has identified Travellers as a target group for specific supports including providing one-to-one supports for individual Traveller and support for voluntary and community groups involving Travellers and / or representing Traveller interests. The three local development companies in Limerick: Ballyhoura Development, West Limerick Resources and PAUL Partnership are contracted to deliver at local level across urban and rural Limerick. Funding is provided by the Department of Rural and Community Development via the Council to support Exchange House Traveller Project in Limerick City and the Rathkeale Together project in Rathkeale.

All Local Government services will be available to members of the Traveller community in accordance with their needs and entitlements as citizens within the local authority area.

The engagement and inclusion of the Traveller community is also supported in the Limerick Regeneration Programme, targeted on the most disadvantaged areas in the city and being delivered by the Council since 2013. The aim is to support comprehensive regeneration of these communities working with an integrated approach across physical, social and economic pillars. The Regeneration directorate will support the Traveller accommodation unit by developing a masterplan and other accommodation options, co-designed with the Traveller community.

This masterplan should address the accommodation needs of the Traveller community living within the regeneration areas of the city, and identify how they connect to the wider community. Traveller families should benefit from the Regeneration programme.

On the 7th June 2024, the people of Limerick voted for their first directly elected Mayor with executive powers. The Mayor is responsible for drafting Housing Strategy, which includes the Traveller Accommodation Programme.

The administrative area of Limerick City and County Council comprises four Districts, which are as follows: the Limerick Metropolitan District, and the three Municipal Districts of Adare/Rathkeale, Newcastle West and Cappamore / Kilmallock.

1.3 The Equal Status Acts 2000-2018

Equality and Human Rights

The council has developed a framework to implement the Public Sector Equality and Human Rights Duty under Section 42 of the Irish Human Rights and Equality Commission Act 2014. The Public sector equality and human rights duty required local authorities to undertake an assessment of the equality and human rights issues that are relevant to their functions. Membership of the Traveller community is one of the nine protected grounds under equality legislation. Under the duty, we are required to take the following steps:

Assess: Undertake evidence based and participative assessment of equality and human rights issues that face Travellers in respect of accommodation, which have relevance for the functions of the housing authority.

Address: Identify and implement actions in place or proposed to be put in place by the Council to address the equality and human rights issues as assessed, as part of the Traveller accommodation programme.

Report: Report on a regular basis on progress made in implementing the duty and addressing the equality and human rights issues as assessed in the plan.

Limerick City and County Council's Equality Action Plan in relation to Traveller accommodation is the responsibility of the Traveller Accommodation Unit. Regular updates on the implementation of the Equality Action Plan will be brought to the Limerick Traveller Accommodation Consultative Committee and all Traveller groups in Limerick. Appropriate training has been provided to all Traveller accommodation unit staff. Training will also be provided as appropriate to other council staff. Training will continue on an ongoing basis as required.

The Council takes a values led approach to implementing the Public Sector Equality and Human Rights Duty. The five core values are Dignity, Inclusion, Participation, Autonomy and Resources.

Dignity is about being respectful and non-judgemental and involves empathy and compassion. Inclusion is about belonging, community and embracing diversity, which requires accessibility and adaptability.

Participation is about meaningful engagement, consultation and openness. It involves people having a voice and being empowered to use their voice.

Autonomy is about empowerment and choice. It involves people having capacity to advocate for themselves and within their community.

Resources is about fairness, transparency and openness. It involves being proactive and evidence based in our use of resources.

This values led approach was used in the development of the TAP. The Council operates a broad equality policy having regard to the need to eliminate discrimination, promote equality of opportunity and protect the human rights of staff and service users.

TRAVELLER ACCOMMODATION UNIT

Limerick City and County Council established a dedicated Traveller Accommodation Unit within the Housing directorate in 2022. This is a multi-disciplinary team, who work specifically with members of the Traveller community in Limerick. The Traveller Accommodation Unit is a one-stop shop to support Travellers with regard to accommodation supports and helps signpost tenants or applicants to other supports as required.

Staff actively participate in meetings with Traveller support groups, NGOs, statutory bodies and other departments within the local authority on accommodation related matters. Staff provide updates on accommodation to the relevant stakeholders, through monthly meetings with individual Traveller families and to senior management within the Council.

1.4 Policy

- It is the policy of the Council to assist Travellers who are assessed as having an accommodation need with accommodation that will address their housing need.
- Travellers are defined in Section 13(1) of the 1988 Housing Act (as amended by the 1998 Housing (Traveller Accommodation) Act as “persons belonging to the class of persons who traditionally pursue or have pursued a nomadic way of life”. Limerick City and County Council recognise the different lifestyle, traditions and needs of the Traveller Community as a distinct group; this programme endeavours to provide accommodation and associated accommodation supports having regard to this.
- Accommodation need will be assessed in accordance with housing legislation including the Housing (Traveller Accommodation) Act 1998.
- An application for accommodation must be made by means of the standard housing application form for accommodation and all applications will be considered. Advice and assistance will be provided to applicants and/or their representatives, if requested by the applicant, to address any difficulties that may arise in completing the application process. New housing application forms were introduced in October 2021, allowing Traveller applicants to identify as a Traveller on the housing application form. This new housing form also allows applicants to choose Traveller specific accommodation if required.
- Applicants for accommodation will be assessed and considered in the context of this programme and the Social Housing Assessment Regulations 2011. Qualified applicants will be considered for available accommodation in accordance with the Scheme of Letting Priorities and other relevant policies including the Anti-Social Behaviour Strategy as applies to all qualified applicants.
- It is the policy of the Council that, where feasible, the preferred option in terms of the type of accommodation requested will be considered. If this is not possible, other accommodation options will be considered and may be offered to individual families. If individual families, without good reason, refuse this offer, their application for accommodation may be given a reduced priority in line with statutory provisions.

- The Council will implement this programme based on consultation with individual Traveller families, other statutory agencies, the Local Traveller Accommodation Consultative Committee, the voluntary sector and other relevant bodies and organisations as appropriate. The Traveller accommodation unit have considered the public sector equality and human rights duty having regard to the need to eliminate discrimination and promote equality of opportunity for all. Regard will be given at all times to the statutory obligations of the Council, available funding and to the feasibility of recommendations and suggestions made in relation to the implementation of the programme.
- Applicants must meet the statutory requirements to qualify for housing and accommodation supports. If applying from the roadside or an unofficial site they must provide evidence that they have pursued other accommodation options. If other options are available as interim solutions the Council must be satisfied that an applicant's decision to opt for the roadside or an unofficial site is reasonable considering individual circumstances. If the Council is satisfied that applicants have no other option, an application from a roadside or an unofficial site will be approved if the applicants are considered to be in need of assistance and meet the other qualifying criteria.
- In circumstances where tenants vacate local authority accommodation and re-apply for accommodation all factors will be taken into consideration when assessing the new application. The Council must be satisfied that the reasons given for vacating previous accommodation are reasonable, in the tenant's best interest, and were not for the sole purpose of securing alternative accommodation. The Council will carry out the assessment using the Social Housing Assessment Regulation 2011 guidance.
- It is the policy of the Council that priority will be given to the provision of permanent accommodation and that the provision of sites with limited facilities as defined in Section 29 Housing (Traveller Accommodation) Act will be considered only in exceptional circumstances as determined by the Council.
- Sites with limited facilities as defined in Section 29 Housing (Traveller Accommodation) Act 1998 will not be provided, if an offer of accommodation is refused, or the applicant would already have been accommodated or who have the resources to provide their own accommodation save in exceptional circumstances as determined by the Council.
- The Irish Human Rights and Equality Commission requested Limerick City and County Council to prepare and implement an Equality Action Plan focusing on Traveller Accommodation. Part of this plan involved addressing the need for transient site accommodation to cater for Travellers with a nomadic lifestyle. The Council proactively engaged with all stakeholders in Limerick. The aim of the engagement was to establish, if there is a need in Limerick for transient sites. An assessed need has not been established for transient site provision in

the functional area of the council. Consultation took place with the following groups:

- Limerick Traveller Accommodation Consultative Committee
 - Limerick Traveller Network
 - Limerick City Traveller Health Programme
 - Primary Health Care Project for Travellers
 - East Limerick Traveller Health Project
 - Rathkeale Together
-
- During these meetings, all groups were asked whether, in their view, there is a need for the provision of transient sites in Limerick. Each group stated that they believed there was no need for transient sites at this time. The groups raised concerns, as to how transient sites would be managed. The impact these sites would have on local Travellers. They raised issues such as feuds and conflict among Traveller families. They questioned how long a family could remain in a transient site.
 - Following consultation with neighbouring local authorities, it was confirmed that local Travellers are not in favour of transient sites at this time. Limerick will continue to liaise with stakeholders and neighbouring local authorities on this issue. Consideration will only be given to transient sites, if Travellers are in favour of the same.
 - Regard has been given to the special circumstances in the town of Rathkeale and specific site provision will continue to be provided in Rathkeale within existing resources. In addition to this, the construction of private sites in designated areas of the town is provided for in the Local Area Development Plan 2022 - 2028. This is to facilitate local Travellers who lead a transient lifestyle, and develop their own property, which is their preferred option.
 - It is the policy of the Council that Travellers themselves must take primary responsibility for their economic activities including horse husbandry and care. Where it is possible and feasible to do so, consideration will be given to supporting Travellers in the pursuit of legitimate economic activities.
 - Persons who own horses are obliged to comply with the requirements of the Control of Horses Act 1996, animal welfare legislation and the Councils Control of Horses Bye – Laws 2017.
 - It is the policy of the Council to develop an inter-agency approach in the delivery of Traveller services. New accommodation provision and / or support services will be provided as part of the inter-agency strategic approach to service delivery. The social work team in the Traveller Accommodation Unit will coordinate this action.

FIRE SAFETY

- The Council has taken a number of actions to maintain fire safety and fire safety awareness on Traveller specific sites. We have engaged the services of the fire safety officers within the Council to conduct a fire safety audit on all Traveller specific accommodation.
- The Council provide equipment including fire blankets, carbon monoxide alarms and smoke detectors to all tenants. Routine inspections of electricity supply and gas installation are carried out.
- Fire awareness training will be provided throughout this programme. This will be organised by staff from the Traveller Accommodation Unit and the Community Sustainment Officer

MAINTENANCE & REPAIR

- Traveller accommodation will be managed on the same basis as the Council's policy for the maintenance and the management of its housing stock. Tenants should be aware of their responsibilities regarding the upkeep of the property as set out in their tenancy or licence agreement. Currently, the Council employ a private contractor to provide a maintenance service to all Traveller specific accommodation sites in Metropolitan area of Limerick. This service is provided 365 days of the years.
- The requirements of national guidelines will be considered in the construction, maintenance and management of Traveller accommodation.

SUPPORTED TENANCIES

- The Council will assist applicants prior to and after the allocation of accommodation and training will be provided in conjunction with the Council's pre-tenancy training programme. The Council in conjunction with other agencies will support tenants to participate in tenancy and community programmes. During the lifetime of the 2019 – 2024 programme, 108 families were supported transitioning into their new accommodation through the pre-tenancy programme.

ANTI-SOCIAL BEHAVIOUR

- All tenants will be required to meet their responsibilities as outlined in the Letting Agreement entered into between themselves and the Council and will be subject to the conditions contained in the Anti-social Behaviour Strategy.

The Council employ a Community Sustainment Officer to support Traveller tenants.

- All tenants will be provided with support as part of the Council's Tenant support services to participate fully in their own living environment and have a meaningful input in the development of this environment.
- Failure on the part of tenants to comply with the requirements of the Letting Agreement, including the provisions relating to anti-social behaviour, may lead to such tenants being required to surrender their accommodation. If necessary legal proceedings may be initiated, by this Council, including an application for an excluding order. The Council will work with residents or community groups to discuss issues related to the management and maintenance of Traveller accommodation. Mediation specialists will be sourced if needed to manage issues of feuding.

HOMELESSNESS

- The Council recognises the vulnerability of Travellers who present as homeless. LCCC recognizes the added difficulty experienced by Travellers in regard to Homelessness. LCCC recognize the difficulties experienced by Travellers in sourcing HAP properties. These applicants will be afforded the supports and services contained in the Mid-West Regional Homeless Action Plan 2022 – 2025. Unauthorised encampments will be assessed in accordance with the requirements of the relevant legislation as appropriate. Prior to families being asked to move or vacate an area, which is not authorised for caravan parking, the Homeless Action Team in conjunction with the Traveller Accommodation Unit will investigate the circumstances of the family to establish if they are included in the accommodation programme.
- While applicants are waiting for accommodation, the Homeless Action Team and the Traveller Accommodation Unit will support applicants. The appropriate support and guidance will be provided during this period to help applicants access homeless services.
- Nothing in this section will prevent consideration being given to assisting Traveller families with accommodation in exceptional cases.

YOUTH HOMELESSNESS

- The Housing for All – Youth Homeless Strategy 2023-2025 is 3-year strategy working towards ending homelessness for young people aged 18-24 through prevention and exits; and improving the experience of young people accessing emergency accommodation

- In particular the Housing for All – Youth Homeless Strategy 2023-2025 identifies young Travellers as one of the six vulnerable cohorts at risk of homelessness. Early intervention and interagency collaboration involving Local Authorities, Local Traveller Accommodation Consultative Committee, Traveller Representative Groups and the HSE Regional Traveller Health Forum is essential to prepare young Travellers to find their preferred accommodation and to access any necessary supports in the community.
- The Traveller Accommodation Unit of Limerick City & County Council will continue to ensure that there is ongoing early liaison with community health care workers and the Local Authority regarding the housing needs of young Travellers. Housing preferences and options, both for temporary, transitional and permanent housing, should be explored to avoid young people accessing mainstream homeless services.
- The Homeless Section and the Traveller Accommodation Unit will engage with young Travellers who are at risk of homelessness and provide guidance towards mediation, tenancy sustainment and other available supports as necessary.
- The Local Authority will provide regular training to community health care workers to enable them to assist young Travellers to complete and submit a complete social housing support application at the earliest opportunity.

TRANSPARENCY & ACCOUNTABILITY

- Transparency and accountability will be provided by reporting progress to the Local Traveller Consultative Committee, Senior Management Team, the Districts and the Housing Strategic Policy Committee on a regular basis.

Section 2:

Progress during last Programme, Existing Provision & Assessment of need

2.1 2019 - May 2024 Programme Outcomes

Targets were set in the previous five-year programme. A key target or performance indicator was the number of offers of permanent accommodation for Traveller families assessed as having an accommodation need. Limerick City and County Council exceeded this target set at 105 with 108 offers accepted (See Table 1). This was achieved during a period of serious challenges in the social housing provision sector and during the COVID pandemic.

In addition to the targets set out below, refurbishment works were completed in some of the residential caravan sites in the Metropolitan District.

Table 1: 2019 – May 2024 Targets and Outcomes

Target	No. of Families offered permanent accommodation	
	Target	Output
Number of Families	105	108 : Accepted (45 refusals of offers)
Transfers	22 Families offered transfers.	
Caravan Loans	14 provided	
Emergency caravans	11 provided	

TRAVELLER CLINICS

Supports were made available to Traveller families by the local authority Social Workers. Specialist clinics were arranged to assist families in relation to their accommodation or accommodation related issues. During the period of the 2019 – May 2024 Traveller Accommodation Programme 38 clinics were held and 366 clients availed of this support option. The holding of clinics was severely impacted by Covid 19 as in person meetings could not take place for several months. The clinics will continue for the duration of this programme.

2.2 Existing Accommodation Provision

Limerick City and County Council has assisted Traveller families with accommodation over the last five years. The accommodation provided has included Traveller specific accommodation and generic housing. The majority of Traveller families throughout Limerick reside in standard housing. There has been a strong tradition of halting site accommodation (Residential Caravan Sites) provision within the Limerick Metropolitan District, however during this period of the most recent programme 18 tenants transferred from halting site accommodation to generic housing.

The majority of tenants and housing applicants who continue to reside in halting site accommodation have expressed a preference for houses in particular group housing. In general, housing applicants and tenants are supported to avail of a range of social housing options which best suit their accommodation need.

TRAVELLER ETHNIC IDENTIFIER

All Travellers who are approved for social housing were contacted in the preparation of this programme to identify their preferred type of accommodation option and to allow applicants to identify as a member of the Travelling community. This allowed the Council to understand the specific accommodation needs of all approved housing applicants, in order to establish the type of accommodation required. To date, of the 172 housing applicants approved 161 applicants have either replied by letter, being contacted by phone, completed the Summary of Social Housing Assessment 2023 or are known to the Traveller accommodation unit staff, so no contact was required. The 11 housing applicants that are outstanding have received a further correspondence to encourage them to respond and will be followed up by a home visit. All Travellers parked on the roadside have been included in this assessment. At all times the Council is conscious of literacy issues, the social work staff endeavour to help support applicants through these issues.

The following table summarises the existing types and location of Traveller specific accommodation.

Table 2: Existing Traveller Specific Accommodation

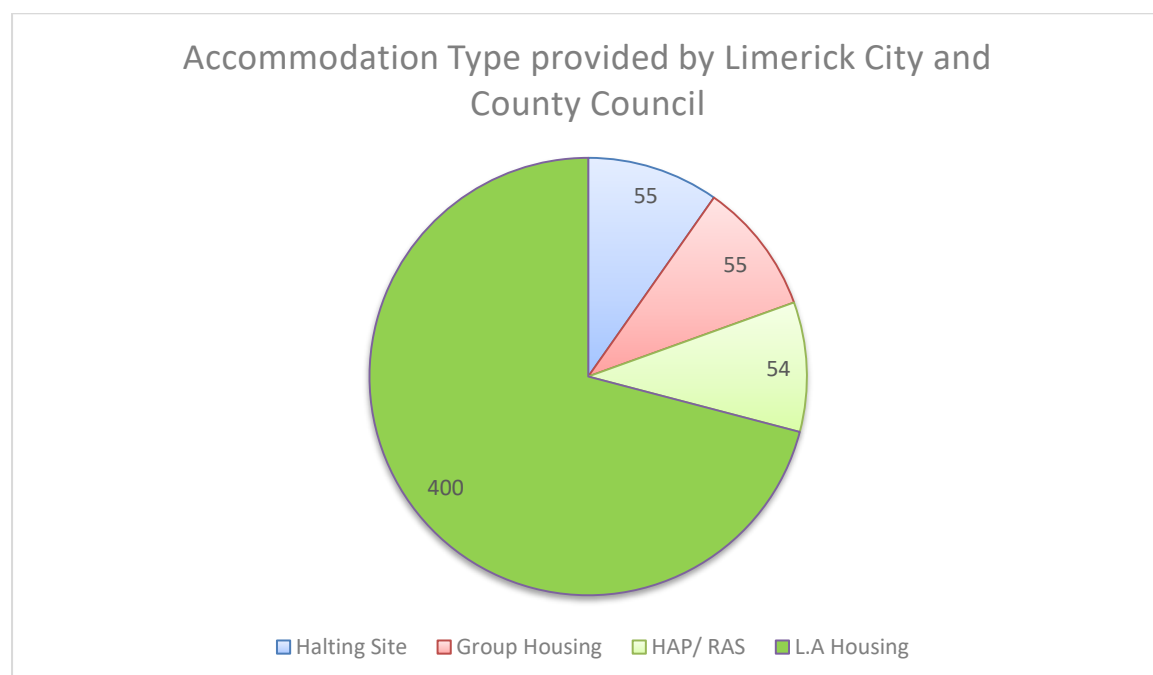
***Some areas are mixed developments**

Residential Caravan Sites	Group Housing Schemes
Bawneys Bridge, Limerick City	Rathkeale x 3, Co. Limerick
Boher, Co. Limerick	Rhebogue, Limerick City
New Crescent, Limerick City	Kilmurry View, Castletroy
*Clonlong, Limerick City	Clondrinagh, Ennis Road
Longpavement, Limerick City	Kilmallock, Co. Limerick
Rathkeale, Co. Limerick	*Clonlong, Limerick City
Toppins Field, Limerick City	Askeaton, Co. Limerick

Table 3 outlines the type of accommodation provided by Limerick City and County Council and the number of Traveller tenants living in such accommodation. This does not include private sites or privately owned houses resourced by Travellers themselves. The majority of tenants are accommodated in local authority rented housing.

Table 3: Accommodation provided with Local Authority Assistance. 2019 – May 2024

(No. of families)



2.3 Assessment of Housing need

An assessment of accommodation need was undertaken in March and April 2024 by the Local Authority as prescribed under Section 9 of the Housing Act 1988. This statutory assessment of need assessed all applicants seeking assistance with accommodation. The number of approved Traveller applicants seeking assistance with accommodation from Limerick City and County Council was 172. This is inclusive of those that are currently in receipt of Housing Assistance Payment and Rental Accommodation Scheme.

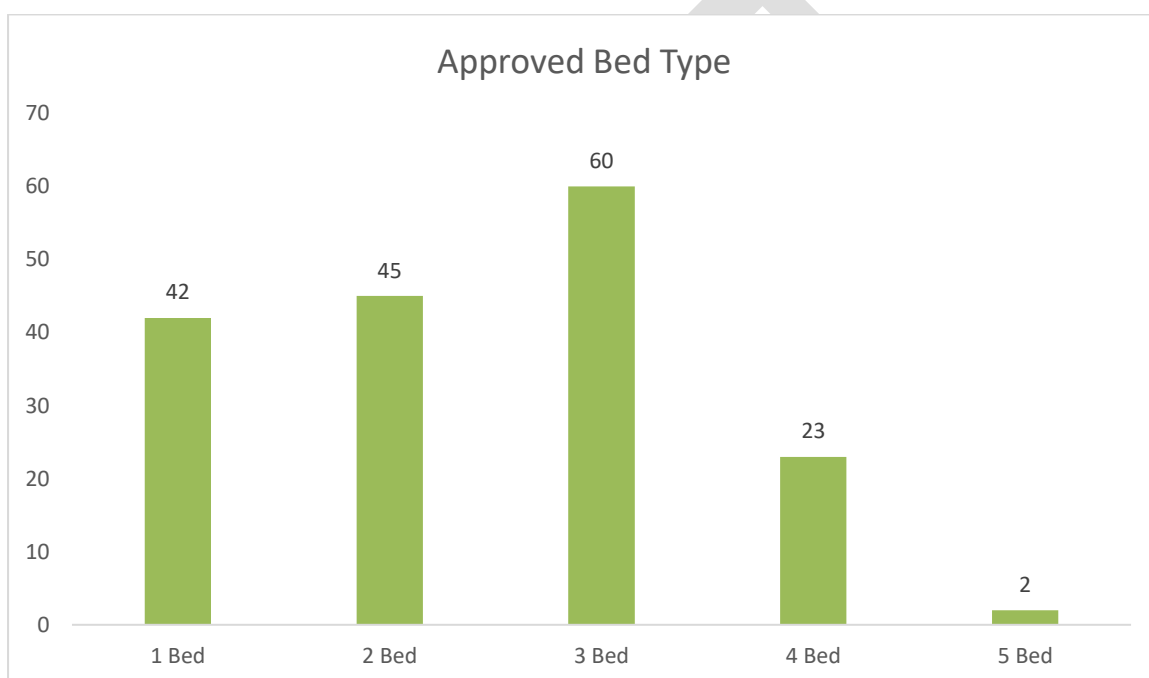
Table 4: Housing Waiting List for Traveller Applicants

Approved Housing Applicants	120
Approved Transfer Applicants	27
HAP Supported Applicants	21
RAS Supported Applicants	4
Total	172

Table 5: Applicants by Municipal District

Municipal District	Number
Metropolitan	92
Adare / Rathkeale	35
Cappamore / Kilmallock	17
Newcastle West	28
Total	172

Table/ Chart 6: Approved Bed Type



District	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Limerick City Metropolitan District	29	20	31	11	1
Adare Rathkeale	7	12	10	5	1
Cappamore Kilmallock	3	4	8	2	
Newcastle West	3	9	11	5	
Total	42	45	60	23	2

Applicants can only be included in the assessment of need, and therefore be considered for accommodation if the appropriate application forms are completed and submitted to the Local Authority. When submitted, an assessment is undertaken to determine the accommodation need in accordance with the statutory assessment regulations. Applicants are supported in this process and the onus to complete and submit the appropriate forms rest with the applicants.

Table 7: Household Size

A	1 adult 0 children	H	3 adult 1 – 2 children
B	1 adult 1 -2 children	I	3 adult 3 or more children
C	1 adult 3 or more children	J	4 adult 0 children
D	2 adult 0 children	K	4 adult 1 – 2 children
E	2 adult 1 – 2 children	L	4 adult 3 or more children
F	2 adult 3 or more children	M	5 adult with children
G	3 adult 0 children	N	6 adult 0 or more children

District	A	B	C	D	E	F	G	H	I	J	K	L	M	N
Limerick City Metropolitan District	23	10	7	6	11	22	3	0	3	1	3	0	1	2
Adare Rathkeale	3	5	2	4	9	9	0	1	0	0	1	1	0	0
Cappamore Kilmallock	4	3	2	0	3	3	0	1	0	0	1	0	0	0
Newcastle West	0	7	1	3	5	9	1	0	1	0	0	0	1	0
Total	30	25	12	13	28	43	4	2	4	1	5	1	2	2

Table 8: Length of Time on Waiting List

District	< 12 months	1 -2 years	3- 7 years	7 - 15 years	15 – 20 years	20+ years
Limerick City Metropolitan District	16	12	36	27	1	0
Adare Rathkeale	5	2	19	9	0	0
Cappamore Kilmallock	4	2	6	5	0	0
Newcastle West	4	7	8	8	1	0
Total	29	23	69	49	2	0

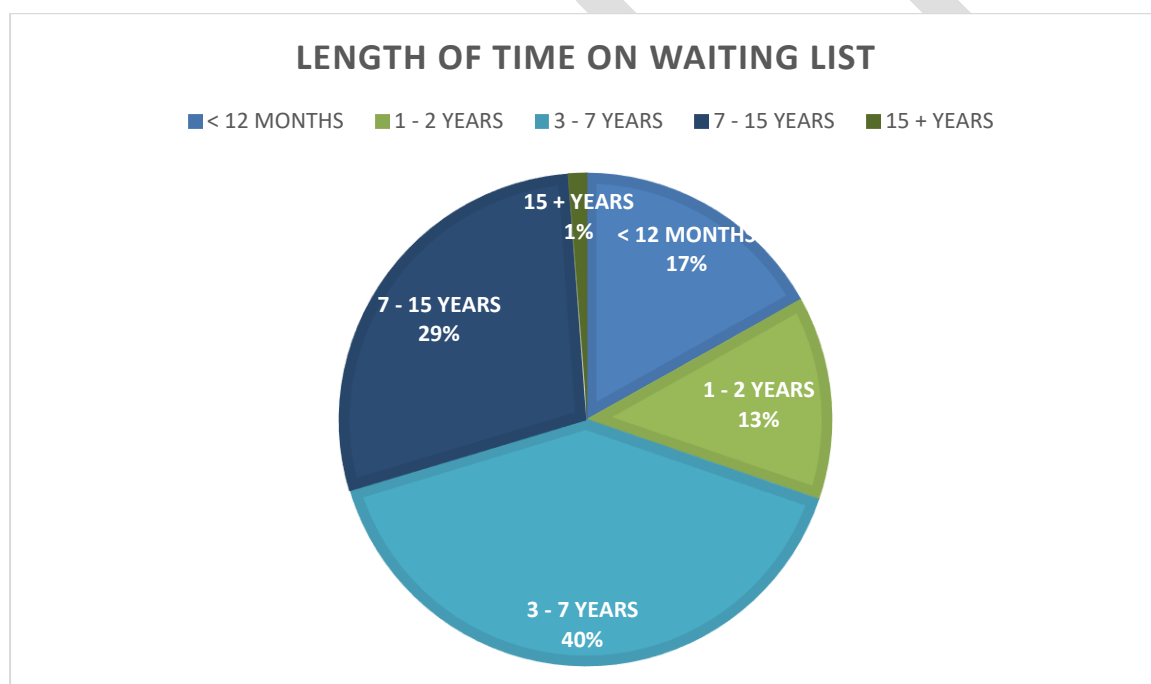


Table 9: Young people 16 - 21 in Halting sites and Group housing schemes

Area	Male	Female	Total
Bawney's Bridge	0	0	0
Clondrinagh	1	2	3
Clonlong	8	6	14
Kilmurry View	0	0	0
Long Pavement	1	0	1
New Crescent	8	2	10
Rhebogue	0	0	0
Toppins Field	3	4	7
Total	21	14	35

Table 10: Number of Travellers in Homeless Services by area of choice and accommodation type required

District	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total
Limerick City Metropolitan District	1	4	1			6
Adare Rathkeale		1	1		1	3
Cappamore Kilmallock			1			1
Newcastle West				1		1
Total	1	5	3	1	1	11

Table 11: Families and Single Applicants in type of homeless service and roadside

Families and Single Applicants in Homeless Accommodation		
Location	Homeless Traveller Applicants	Homeless Housing Overall
Hostel	1	147
Hotel and B&B	8	117
Family Hub	2	16
Roadside	5	
Total	16	280

Table 12: Basis of Need by area of choice

District	Homeless	Disability/ Medical	Involuntary Sharing/ Overcrowded	Requires HAP	Unfit / Unsuitable	Total
Limerick Metropolitan District	6	14	19	12	41	92
Adare Rathkeale	3	8	7	6	11	35
Cappamore Kilmallock	1	1	3	3	9	17
Newcastle West	1	4	6	10	7	28
Total	11	27	35	31	68	172

Table 13: Employment Status

Municipal District	Disability	Pensioner	Employed/ Self Employed	Unemployed	Other
Limerick City Metropolitan District	4	2	7	79	4
Adare Rathkeale	1		1	31	
Cappamore Kilmallock	1		2	11	1
Newcastle West				28	
Total	6	2	10	149	5

TRANISIENT SITES

Section 6 of the 1998 Act requires Local Authorities to assess accommodation needs of Travellers who are assessed under section 20 of the Housing (Miscellaneous Provisions) Act 2009. As part of this process, the need for transient sites must be assessed. Limerick City and County Council held meetings with various stakeholders, including the LTACC, Limerick Traveller Network, Limerick City Traveller Health Programme, Primary Health Care Project for Travellers, Rathkeale Together and East Limerick Traveller Health Project.

Through consultation from these meetings, it became clear that there is no demand for the provision of a transient site within the Metropolitan area and the three Municipal areas of Limerick. Concerned were raised regarding the management of transient sites and the impact of these sites on local Travellers. The Council will cooperate with the national bodies including the Programme Board and the Department of Housing, Local Government and Heritage with regard to exploring an approach to the provision of a network of transient sites at regional and national level.

2.4 Projected need

In addition to the current assessed need, consideration has also been given to the projected need for accommodation during the period of this programme. Experience gained from previous programmes and consideration of other factors indicate that the projected increase is at least an increase of 7% per annum. Based on this it is projected that an estimated 60 additional applicants may seek accommodation assistance from the local authority during the period of this programme. It must be acknowledged, that expectations have to be realistic with regard to accommodation targets. The availability of social housing supply and the reality that there is a waiting period for all new approved applicants before local authority accommodation comes on stream needs to be taken into account.

Through meetings with stakeholders, it was also evident that there is no demand for group housing or halting site accommodation in the Municipal areas of Limerick. Within the Metropolitan District, the stakeholders did not state a preference for a specific type of accommodation and believed that it was an individual decision. **The Limerick Traveller Network state that from their research that generic social housing is not the preference of the vast majority of Travellers living on sites in Limerick City.** However, all stakeholders did state that Traveller specific group housing was required to enable families to reside together. All the various groups that were met stated that the preferred housing option would be general social housing in County Limerick.

Section 3: Performance, Monitoring & Measurement

Accommodation options to meet social housing needs have changed dramatically in recent years with the introduction of new housing supply options such as Housing Assistance Payment (HAP), Long Term Leasing and the Rental Assistance Scheme (RAS). National policy provides for mechanisms to be in place to ensure that the new supply options can be sourced, and made available, by the Local Authority. The change in national policy has been influenced by the increased demand for housing and lack of availability of housing in the private sector. The performance at local level is dependent on the availability of national funding and the realisation by applicants that consideration needs to be given to the new supply options. The changing landscape of the social housing sector impacts on the delivery at local level and this has to be borne in mind by all stakeholders.

Having considered all the factors involved, it is proposed that **120** families will be assisted with new or improved accommodation within the range of housing supply options during the period of the programme. The supply options include but are not limited to Local Authority accommodation (Generic and Traveller Specific), Approved Housing Bodies and Housing Assistance Payments. The proposed targets will be monitored on an annual basis (**24 X 5**).

This target proposed is in the context of the current economic climate and the achievement of these targets will be dependent on supply, available resources, statutory requirements and the co-operation of the applicants.

The Traveller Accommodation Unit will be responsible for the strategic delivery of the programme including implementation of targets and the development of the capital works related to the programme. Monitoring Returns will be submitted to the Department of the Housing, Local Government & Heritage as required.

A new Local Traveller Accommodation Consultative Committee will be established for Limerick City and County Council and reports on the delivery of this programme will be submitted to the committee at each meeting. The committee will meet at least four times per year. The committee plays a key consultative role in the provision and management of Traveller accommodation. The Local Traveller Accommodation Consultative Committee is informed of all aspects of Traveller accommodation development and related matters to ensure that all issues are systematically addressed.

The Housing Directorate give progress reports on its Housing Delivery Action Plan to each of the Districts on a quarterly basis. Progress reports on the TAP will be included in these updates.

A summary of the activities in relation to Traveller accommodation will also be included in the annual report of the Council, Director General and Mayoral reports, and the Home & Social Development Strategic Policy Committee as required.

Section 4 Implementation Strategy and Proposed Measures

4.1 Strategy

The Council will, within the period of this five year programme, endeavour to meet the accommodation needs of Travellers who are approved applicants. Accommodation, social work services and accommodation related supports will be provided in an integrated manner that is inclusive and reflects the needs of the Traveller community.

The Traveller Accommodation Programme will be implemented in conjunction with the Regeneration Directorate and the Limerick Development Plan 2022 – 2028, and in accordance with all national housing strategies.

The desired outcome of this programme is not only the provision of quality accommodation for members of the Traveller community, but that benefits will result in other aspects of their lives, thus improving their quality of life.

UNIVERSAL ACCESS

The Council is committed to providing universal access accommodation. This type of accommodation is inclusive to all members of society, and allows persons to live independently in their home. Key features of universal access disability housing include accessible entrances and exits, interior accessibility, adaptable bathrooms and safety features. This is part of our broader efforts to promote inclusive design and ensure that the build environment accommodates the needs of all the individuals, supporting independence and enhancing quality of life for people with disabilities.

COMMUNITY SUSTAINMENT

Tenant support and community sustainment is a guiding principle in the delivery of social housing in Limerick and will be at the core of implementation of this programme. The Traveller Accommodation Unit welcome and encourage tenant participation, in particular within Traveller specific accommodation. A specific Community Sustainment Officer was appointed to support Traveller tenants in Limerick in 2022. The Community Sustainment Officer works closely with the Traveller Accommodation Unit, to encourage capacity building and support the establishment of resident groups to take ownership of their area. Staff utilise dormant account funding to encourage and support families in Traveller specific accommodation to improve their living environment. The requirements of local and national policies will be central in the delivery strategy of the Traveller Accommodation Programme, and is subject to funding from the Department of Housing, Local Government and Heritage.

HOUSING OPTIONS

Limerick City and County Council will promote the full range of accommodation supports for Traveller tenants / housing applicants, which are set out hereunder:

- Standard Local Authority Housing
- Rebuilding Ireland Home loans
- Dereliction Grants
- Group Housing
- Residential Caravan Sites
- Caravan Loan and Grant Scheme
- Annuity Loans/Traveller Grant for purchase of a house.
- Mobility Aids Housing Grant Scheme
- Housing Aid for Older People
- Housing Adaptation Grant for People with a Disability
- Long term leasing
- Approved Housing Bodies
- Rental Accommodation Scheme (RAS)
- Housing Assistance Payments (HAP)
- Private Rightsizing Scheme
- Retro Fit Grants

Officials of Limerick City and County Council will ensure that applications for funding from the Department of Housing, Local Government & Heritage will be made and that Traveller accommodation needs will be included in appropriate Council plans.

Consideration is given in the accommodation needs of Travellers when preparing strategies for housing in Limerick and the Limerick Development Plan 2022 - 2028. Likewise, the social and economic needs of Travellers to promote inclusion and measures to promote empowerment of Travellers is supported in objectives under the Local Economic Community Plan 2023 – 2028.

The Council will develop and deliver its accommodation programme in an integrated manner and will consult and liaise with other service providers via existing and new structures as appropriate.

The provision and management of accommodation for Travellers by the voluntary housing sector will be encouraged and supported by the Council.

On the basis of an assessment of current and projected need, the proposals in this programme are included for the purpose of addressing the assessed needs as far as possible, bearing in mind the availability of resources to do so, legal requirements and restrictions, co-operation from applicants, and where possible, community support.

The Traveller Accommodation Programme adopted by the Limerick City and County Council will be reviewed within three years from the time it has been adopted or at any other time as directed by the Minister for the Housing, Local Government & Heritage. A review of the programme can be carried out at any time if considered necessary by the Local Authority.

Support will be given to community-based initiatives that will facilitate Travellers and the settled community to work more closely together and will enable Travellers to have an active role in their local communities. Additional resources will be sought by the Council to assist meaningful Traveller participation.

Consideration will be given to supporting projects for Travellers who own property, but who need assistance with accommodation to improve or develop these properties to meet their, and/or extended family accommodation needs.

Travellers who own their own property will be encouraged to improve these properties if necessary and the Council will use the appropriate statutory provisions to deal with areas of dereliction.

4.2 Proposed Measures

The implementation of the following measures is critical in the delivery of the targets set out in this programme and the delivery of the programme requires the commitment of all stakeholders. The targets will be achieved via the provision of generic housing and Traveller specific accommodation. It also includes the upgrading of some existing accommodation. The Council is required to operate within the constraints of the economic climate and the funds available. Applicants will also have to be realistic in their aspirations and the priority is that accommodation needs will be met. This may not always result in the preferred option of the applicants being provided.

The measures to achieve the objectives will be met under two main headings:

- Generic Housing Supports
- Traveller Specific Accommodation

4.3 Generic Housing Supports

The accommodation needs of Traveller applicants who express an accommodation preference for housing will be met via the various housing supply options as set out in the implementation strategy in this programme.

The purchase of single instance houses will only be considered in exceptional cases where special needs exist and appropriate accommodation cannot be sourced within the local authority housing stock or via the available housing supply options.

The programme does not include proposals in relation to specific generic housing supply options. These apply to applicants who reside throughout the city and county and will be assessed and considered for such accommodation in accordance with the relevant statutory requirements in place including the Scheme of Letting Priorities.

Traditionally, Travellers have opted for generic housing supply options in Abbeyfeale, Askeaton, Cappamore, Kilmallock, Newcastle West, Patrickswell, Rathkeale and Limerick City. Travellers wishing to apply for generic housing supply options can indicate their areas of preference in the housing application form and are not confined to the areas listed above. The Traveller Accommodation Unit will assess and prioritise where possible accommodation for applicants with disabilities through acquisitions.

Travellers residing in a private site on the Ballysimon Road have the option to apply for housing supports to Limerick City and County Council.

The Approved Housing Body sector will also be supported to assist members of the Traveller community.

4.4 Traveller Specific Accommodation

The Council will prioritise the improvement of the living circumstances of tenants living in Traveller specific accommodation where the existing accommodation does not meet their current need. The achievement of this is challenging for all involved and the following actions will be pursued during the period of the programme. The delivery of the proposed actions is subject to funding being made available to the Council and successful compliance with statutory requirements, including Planning and Development.

Bawneys Bridge Residential Caravan Park, Limerick City

The site comprises an eight bay permanent halting site, with service units in each bay. The Health & Safety Authority have directed that no new developments or expansions to existing developments will be allowed within the zonal area of the Sevoso site. (*Council Directive 96/82/EC on the control of major-accident hazards.*). The option of extending this site to cater for the accommodation needs of extended family members is not possible due to the restriction of new developments in the area.

Some tenants residing on the site have indicated that they would like to be accommodated in a group housing development or generic housing. The Council will continue to work with these tenants and housing applicants by actively identifying land or generic housing to meet their accommodation needs subject to funding from the Department of Housing, Local Government and Heritage.

Boher, County Limerick

Temporary Site

The permanent accommodation needs of this extended family needs to be addressed. The family has expressed a desire to remain at its current location and their preference is to be accommodated in Traveller specific accommodation on the current land. The provision of new permanent accommodation at this location will be explored, having full regard to statutory planning and development requirements and having regard to the location of the site on a national primary route. The provision of permanent accommodation for the extended family at this location is dependent on funding being made available by the Department of Housing, Local Government and Heritage. The mainstream housing supply options will also be available to the families as possible alternative options should they apply for this option.

The Council will continue to liaise with the family in relation to progressing this option.

Kilmurry View, Group Housing, Dublin Road, Castletroy, Limerick

Funding was sourced for the conversion of the three remaining bays to housing and the conversion of the community centre to a one-bedroom unit based on the accommodation needs and requirements of the families residing in Kilmurry View, during the 2019 – 2024 TAP. Works commenced in the second quarter of 2019 and was completed early 2020. This development is now a Group housing scheme, consisting of eight units.

The Traveller accommodation unit will continue to work with the tenants in Kilmurry View. They will provide assistance with accommodation as new family formations begin. Tenants and housing applicants can also apply for generic housing supply options.

Childers Road (New Crescent) Residential Caravan Park, Limerick

This residential caravan site consists of 11 bays and a disused community centre. Some improvement works were carried out to this site during the period of the programme 2019-2024 to help alleviate overcrowding currently on the site.

The option of converting some units from halting site accommodation to a group housing development was explored during the last programme and no progress was made. The Council engaged CENA (Approved Housing Body for Travellers) and Bedford Row family project, to work with families regarding improved or alternative accommodation; no progress was made. The proposed development has yet to proceed due to reservations of some tenants residing on the site.

The Council will endeavour to address the reservations of the tenants with the intention to improve the accommodation circumstances for these families. The Council will continue to engage with the families in New Crescent with regard to the recommendations of CENA. The Council will also liaise with the tenants and the local Traveller led groups to come to a solution regarding the current accommodation issues.

Tenants and housing applicants seeking assistance with accommodation can also apply for generic housing supply options. Subject to funding from the Department of Housing, Local Government and Heritage.

Clondrinagh Park, Group Housing, Ennis Road, Limerick

This development now consists of fifteen houses.

The Traveller accommodation unit will continue to work with tenants in Clondrinagh and in particular, with the young persons who are forming new families. All land available within the site will be assessed with regard to its suitability for housing.

New housing applicants and tenants can also apply for generic housing supply options. Subject to funding from the Department of Housing, Local Government and Heritage.

Clonlong Traveller Accommodation, Limerick

This development consists of five houses and ten bays.

The Traveller accommodation unit is in ongoing discussions with the tenants of Clonlong with regard to their accommodation options. A long-term strategic plan is required to meet the current and projected needs of the tenants / housing applicants. The Traveller Accommodation Unit will continue to liaise with the Regeneration Directorate and the Planning Department on all plans for Clonlong.

It is proposed that issues can be resolved best by the reduction in size of the existing site, which will require the relocation of some residents. The plan therefore is to reduce/redesign the existing site to a group housing project and some tenants will be relocated to achieve this.

This plan will only take place with the full agreement of all the tenants currently residing in Clonlong, and subject to funding from the Department of Housing, Local Government and Heritage.

The Traveller Accommodation Unit will continue to access the accommodation needs of this site, through regular interaction with the families. From this consultation, a plan can be put in place to suit the accommodation needs of the families. These interactions will be reported at the quarterly LTACC meetings.

It is envisaged that, once completed, the site will provide for improved living conditions for the remaining tenants and assist in improved management structures.

Tenants and housing applicants seeking assistance with accommodation can also apply for generic housing supply options.

Hillview Caravan Park, Fairhill, Rathkeale, County Limerick

This development consists of an eleven bay site. It is proposed to refurbish all existing units on this site, with work to commence in Q4 2024. These works are in agreement with the tenants of Hillview Halting Site and in cooperation with “Rathkeale Together” a community group working with both Travellers and the settled community in Rathkeale. Works to be complete 2025. The Department of Housing, Local Government and Heritage have approved funding.

Kilmallock, County Limerick

Traveller applicants in the Kilmallock area have expressed a preference for housing and applicants will be accommodated via the generic housing supply options. The provision of group housing accommodation for extended Traveller families in the area will be considered where a family member owns a property and is deemed not to have the required resources to develop it.

This can only be achieved with the agreement of the property owner and is an option open to consideration should the family request it. Consideration will be given to provide suitable accommodation to meet the needs of overcrowding in existing generic housing schemes, which accommodate Travellers. This will be subject to funding being available.

The Traveller accommodation unit will continue to work with tenants in council owned group housing as required.

Long Pavement Temporary Caravan Park, Limerick City

This site is a temporary site and it is not possible to provide a permanent accommodation solution for the tenants at this location. An environmental assessment report commissioned by Limerick City Council in 2005 (White, Young and Green Consultant Engineers) stated that the current site is not suitable for the provision of a Traveller Specific Group Housing Project.

Extensive improvement works to the temporary site were completed since then. The footprint of the site has been reduced as requested by the tenants over the last five years from seventeen bays to eight bays.

Some tenants have expressed a preference for group housing and it is proposed that suitable site/sites be identified in the area for providing same as recommended in the previous programme.

The completion of this project is dependent on funding being available from the Department of Housing, Local Government and Heritage, and a site being identified for group housing.

Tenants and housing applicants on this site will also be considered for mainstream housing supports.

Rhebogue Group Housing, Limerick City

This development now consists of two houses, which accommodates one extended family. A previous proposal to accommodate the tenants at different locations was achieved during the last programme. As a result, the footprint of the site has been reduced by over two thirds. The Traveller accommodation unit continue to liaise with the remaining tenants, it remains the intention of the Council to comply with its statutory responsibilities and to respond to the accommodation needs as assessed, and where possible, the accommodation preferences of the remaining residents of Rhebogue Group housing scheme.

Tenants and housing applicants in Rhebogue will also be considered for mainstream housing supports.

Toppins Field Residential Caravan Park, Limerick City

This development consists of three bays. The footprint of the site has been reduced during the last programme at the request of the tenants. This site currently does not adequately meet the accommodation needs of the tenants residing on the site. Having considered all the factors in this case the provision of Group housing would meet their long-term accommodation needs and would be a sustainable accommodation solution for these tenants, if all are in agreement. The Traveller accommodation unit will continue to engage with the tenants in order to improve their current accommodation needs.

It is proposed in this programme that group housing be provided to tenants interested in residing together in the local area. All other housing options will also be available to tenants and housing applicants.

The delivery of the accommodation options for the tenants will be undertaken in consultation with the Regeneration directorate for the area. This proposal is dependent on funding being from the Department of Housing, Local Government and Heritage, and the co-operation of the tenants.

Section 5: Conclusion and Review

This programme outlines the existing and projected need for Traveller Accommodation and proposed measures to improve the accommodation circumstances for Travellers in Limerick for the period 2025 - 2029. It outlines the policies in relation to Traveller Accommodation, the strategy for implementation and the targets. The Council will work with Travellers, Traveller representatives, local communities and other agencies to deliver the programme and provide quality accommodation for members of the Traveller community. In the development of this programme, staff from the Traveller accommodation unit consulted all Traveller led groups in Limerick and the Limerick Traveller Accommodation Consultative Committee for their input.

This programme is based on open consultation with the LTACC, Limerick Traveller Network, Limerick City Traveller Health Programme, Primary Health Care Project for Travellers, Rathkeale Together and East Limerick Traveller Health Project, upholding the public sector duty principles, recognition of the needs of the Traveller community and the statutory provisions pertaining to accommodation and equality through the Equal Status Act 2000 - 2018.

The implementation of this programme requires a commitment from all involved to work together in collaboration and to commit to the implementation of the agreed proposals. The proposals contained in the programme are also subject to the necessary funding being available from the Department of Housing, Local Government and Heritage.

This programme will be reviewed within three years of adoption or at any time as the Council or the Minister for the Housing, Local Government & Heritage deem necessary.

Annual targets will be reviewed on an ongoing basis to ensure the progress is being maintained. Regular reporting will be provided to the Senior Management Team, the Housing Strategic Policy Committee and the Department of Housing, Local Government and Heritage. A report on all works will be provided each quarter to the Local Traveller Accommodation Consultative Committee. Progress reports on the TAP will be included in the District updates on the Housing Delivery Action Plan.

Section 17 (1) (a) of the Housing (Traveller Accommodation) Act, 1998 provides that a relevant housing authority shall review its accommodation programme at least once in each three year period, or at such time as directed by the Minister. Any amendment to the accommodation programme proposed following any such review must be made with seven months and is subject to the same procedures and requirements, including public consultation.

The Minister has, under section 17 (1) of the 1998 Act, that a review of the next accommodation programme should be carried out no later than the 30th June 2027.

Appendix - Submissions

CENA

HSE National Traveller Health Implementation Group

HSE Social Inclusion Midwest Community Healthcare

Irish Traveller Movement

National Traveller MABS

Irish Coalition to End Youth Homelessness

Appendix – Submissions on the Draft Traveller Accommodation Programme



Submission to Limerick City and County Council on Preparation of Traveller Accommodation Programme

Cena, as you are probably aware, is an Approved Housing Body. We work on accommodation needs exclusively for and with members of the Traveller community. We are a Traveller-led organisation and all of our outreach workers and Tenant Liaison Officers are fully trained members of the Traveller community.

The 'Needs Assessment' Process

Cena places the utmost importance on the process of needs assessment. As well as having purchased homes and built homes in several local authority areas to date, we have also had in-depth engagement with Traveller families (through 'Feasibility Studies') in eight counties up to now. All of these initiatives have been undertaken on a Traveller-to-Traveller basis, and we have found that results emerging are much more reliable than what has been achieved through more traditional methods up to now. There are two reasons for this increased reliability:

1. Firstly, the Traveller-to-Traveller basis for consultation is centrally important. The trust that can be established in analysing accommodation needs is essential in getting a realistic and reliable picture of how accommodation needs can be addressed in the longer term.
2. Secondly, the extent and nature of accommodation needs means that a different approach is absolutely necessary. Answering a question about current accommodation needs is not an easy task where the family or individual is living in a crisis situation – and has often been

living in crisis for some period of time. Our own experience, in opening up a discussion with Travellers, is that the question about long-term needs and preferences has never really been asked before. For example:

- a. The needs assessment process people are used to is about identifying the kind of accommodation needed (A or B or C). Where options are limited, then responses are also limited (the options of D E or F are never considered)
- b. It is extremely difficult for those living in crisis to reflect on what their longer-term accommodation needs might be. It is more likely that responses will reflect what people need 'next week' (in response to current critical living conditions) rather than what they think is needed so their children (and even grandchildren) can have their accommodation needs met in a sustainable way. These kind of short-term responses, we would argue, add to problems in Traveller accommodation rather than relieving them. People will accept offers of accommodation that are not suitable or sustainable – leading to problems for them, their neighbours, and local authorities who find the families back on their housing list in a relatively short period of time.

Instead of 'needs assessment' the process we have developed through Cena we prefer to describe as 'creating the space where people can determine their own needs in an informed way'. This results in a more reliable understanding of what sustainable solutions might look like. But it also helps ensure that proposals are realistic – based on an understanding amongst respondents about what might be possible and what is not possible.

Creating a County Wide 'Template' for the Needs Analysis Process

Cena are currently involved in rolling out this process, for the first time, on a county-wide basis. This is being undertaken in partnership with Clare County Council¹ and involves:

- An intensive training process, participants in which are all members of the Traveller community. The training equips participants with the knowledge and skills needed to engage with Traveller families county-wide. This was delivered in seven modules over a twelve-week period.
- In-depth engagement with every Traveller household in the County – using a detailed template for recording responses.
- Entry of results into a dedicated database.
- Recording of conclusions and recommendations for meeting needs.
- Analysis of results within a 'working group' framework. Cena will be engaging with Clare County Council periodically as results are compiled over the coming months. Results will provide a solid foundation for interpreting needs and identifying possible response over a longer period of time. Many of the plans to address need may therefore go well beyond the next TAP now being prepared. But the key focus will be on addressing what is possible to achieve over the coming five years (identifying the potential role of Cena and other AHBs, as well as the central role of local authority in delivery).

Cena are also using the same template to carry out a needs analysis in Longford. This is restricted for now to Traveller households in Longford Town, but with the intention of extending this county-wide at some stage – and certainly with the intention of incorporating these results into the next Longford TAP (using the same 'joint working group' model as established in Clare)

¹ The Clare process is also being supported by the HSE, through SICAP, and in cooperation with Clare Traveller Community Development Project

Extending and Expanding on the Model of Engagement

We fully understand the time commitments and scheduling restraints under which local authorities are now operating to ensure completion of the TAP planning process.

We do however, strongly recommend that, within the scope of your next TAP, you consider:

1. An acknowledgement of the need (and ultimate benefit) of a more in-depth, comprehensive and peer-based assessment of Traveller accommodation needs.
2. According priority to this as a specific action in your next TAP. We appreciate the time constraints involved and recognise the impossibility of this kind of process being completed in advance of signing off on your next TAP. If this was specified as an action in the first phase of your next TAP, however, then results from the process would be available at the interim review stage. And these could be incorporated into the second phase of implementation.

We intend to organise dedicated seminars, based on the process and results from County Clare.

These will be initially held on a regional or provincial basis – beginning with Munster before the end of 2024. All interested local authority personnel will be invited to attend.



**National Traveller MABS Submission to
the preparation of the
Traveller Accommodation Programme 2025 – 2029**

February 2024

About National Traveller MABS

National Traveller MABS, established in 2005, is a leading advocate for the financial inclusion of Travellers in Ireland.

National Traveller MABS works to reduce poverty, discrimination and the financial exclusion of Travellers. We work with the Traveller community and organisations to change policy and practice which impacts Travellers financially.

Our work involves helping Travellers access MABS and Citizens Information services, community education, research, and policy development.

National Traveller MABS works to end the financial exclusion of Travellers in Ireland by:

- Promoting and developing culturally appropriate financial education programmes.
- Supporting the development of a collaborative working relationship between local MABS, local Travellers and other relevant organisations.
- Working with partner organisations to address exclusion by developing alternatives to mainstream saving and borrowing
- Highlighting issues of over-indebtedness and exclusion from financial institutions, making appropriate responses through our research and policy work

In the past National Traveller MABS has supported Travellers in accessing culturally appropriate accommodation through a number of successful Caravan Loan Guarantee Schemes. A 2015 review of these schemes made a number of recommendations that may inform the provision of similar schemes². In 2018 we also undertook a study into the cost of mobile home/trailers. This study also made a number of recommendations in relation to the

² National Traveller MABS, *A Review of National Traveller MABS Supported Caravan Loan Guarantee Schemes*, (Dublin, 2015) <https://www.ntmabs.org/publications/policy/2015/a-review-of-national-traveller-mabs-supported-caravanloan-guarantee-scheme.pdf>

provision of fuel efficient affordable culturally appropriate accommodation³. In 2022 we undertook further research in collaboration with Atlantic University Sligo into the energy efficiency of mobile homes and made further recommendations on providing energy efficient culturally appropriate homes⁴. We have also written an outline for a trailer rental scheme which we believe should run alongside the trailer loan scheme to give families the opportunity to live in residential standard, energy efficient homes regardless of their income⁵.

Local authorities have an integral role to play in ensuring the financial inclusion of Travellers through the development of the Traveller Accommodation Programme by ensuring that accommodation needs of Travellers in their area are properly addressed in a manner that is both equitable and culturally appropriate.

Throughout this submission when we use the word trailer we are referring to a caravan/mobile home. Trailer is the preferred term used by Travellers.

³ Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

⁴ National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-versionoct2022.pdf>

⁵ National Traveller MABS, *Proposal for a National Caravan Rental Scheme - The case for an alternative*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/caravan-rental-scheme.pdf>

Recommendations for the Traveller Accommodation Programme 2025-2029

- **That local authorities incorporate an accessible and transparent application process and should signpost all potential applicants to their local MABS for free independent financial advice as well as providing a deduction at source mechanism for repayments.**
- **That the trailer loan amount on offer should be increased to between €60,000 and €80,000.**
- **That Traveller Accommodation Programmes introduce a caravan rental scheme for families who are not in a position to finance the purchase of a residential standard trailer.**
- **National Traveller MABS recommends that all local authorities support Travellers to access residential standard trailers and that all units provided to Travellers by the local authority be residential standard.**
- **Local authorities should facilitate energy efficiency information initiatives for Travellers living in mobiles.**
- **Local authorities should include more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers in the Traveller Accommodation Programme.**
- **That a full and robust consultation with the Traveller community in the local authority's area take place.**

- **That the Public Sector Duty be fully embraced by local authorities in the drawing up of the Traveller Accommodation Programme.**
- **The local authority should ensure that equality reviews be adapted into the Traveller Accommodation Programme as per the IHRC recommendation.**

Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029

The provisions of the *Housing (Traveller Accommodation) Act 1998 Act* provide for public input and consultation at all stages of the preparation and implementation of Traveller Accommodation Programmes. Please find listed below National Traveller MABS recommendations for the Draft Traveller Accommodation Programme 2025-2029:

Trailer Loan Scheme

National Traveller MABS is aware that local authorities, supported by the Department of Housing have reintroduced the trailer loan scheme on a pilot basis over the past number of years. We welcome this support of Travellers in accessing credit to purchase trailers.

National Traveller MABS recommends that all local authorities should have an easily accessible application process. This would involve:

- Advertising the scheme on the local authority website, making the local Traveller organisation(s) aware that the scheme is in operation, ensuring the local LTACC is aware the scheme is operating and advertising the scheme in local papers to ensure the community know the scheme is operating.
- Making application forms and scheme details available online as is the case with all other social housing schemes.
- Deadlines for applying for the scheme should be clearly advertised on the local authority's website.
- Application forms and information about the schemes should follow NALA's Plain English guidelines to ensure that they are understood. 1 in 4 adults in Ireland have a literacy difficulty and this number is significantly higher in the Traveller community.

- Signposting all potential applicants towards engagement with money management support services such as their local MABS office. It should be the decision of the potential applicant as to whether they choose to engage with MABS but they should be made aware that the service is available to them should they want it.
- Making provision for repayments to be deducted at source, subject to protected income considerations. The Household Budget Scheme would be the preferred mechanism for social welfare reliant applicants.

Recommendation: That local authorities incorporate an accessible and transparent application process and should signpost all potential applicants to their local MABS for free independent financial advice as well as providing a deduction at source mechanism for repayments.

The funding allocated for the scheme is often insufficient to meet the needs of the Traveller community, leading to the creation of long waiting lists and delays in families being able to access loans. The maximum loan amount available under the current scheme is €40,000.

Research carried out by National Traveller MABS in conjunction with Atlantic University Sligo in 2023 found that trailers that conform to British Standard BS 3632, which mean the trailer is suitable for year round living and conforms to energy efficient status begin at €60,000. This price does not include disposal, installation, delivery and associated charges which can add another €10,000 to the price of the trailer.

Furthermore the purchasing power of the loan has been weakened as suppliers may increase prices of units when they know that the purchaser is buying under the scheme. These combined factors mean many families who have availed of the scheme are purchasing substandard trailers, not suitable for year round living, which are not energy efficient and which will have a limited lifespan. To offset these problems National Traveller MABS would recommend increasing the loan amount increased.

Recommendation: That the trailer loan amount on offer should be increased to between €60,000 and €80,000.

Trailer Rental Scheme

Our recent research study into the cost of trailers found a range of trailers on offer ranging from €15,000 to over €100,000. However a residential standard trailer, one which is suitable for year round living and which conforms to the British Standard BS3626.2015 began at €60,000 for a two berth trailer. Residential standard trailers, as opposed to units used as holiday homes, are more fuel efficient and provide families with a better quality of accommodation. We acknowledge and know that some Traveller families on low incomes will not be in a position to purchase a residential standard trailer or qualify for the trailer loan scheme and this is feedback we have received from MABS money advisors and from local authorities during the current iteration of the trailer loan scheme. A rental scheme would ensure that Traveller families would be able to access good quality affordable accommodation. Our recent publication has called for and outlined how a trailer rental scheme could operate and could offer benefits to both families and the local authority and Government⁶.

Recommendation: That Traveller Accommodation Programmes introduce a trailer rental scheme for families who are not in a position to finance the purchase of a residential standard trailer.

Addressing fuel poverty

National Traveller MABS is concerned with the reduction and elimination of fuel poverty in the Traveller community. Fuel poverty arises out of the relationship between household income, energy efficiency of the dwelling and fuel prices and is an acute problem for low income groups in particular. Households are deemed to be in fuel poverty when they spend 10% or more of their income on fuel⁷.

⁶ Proposal for a National Caravan Rental Scheme - The case for an alternative
<https://www.ntmabs.org/publications/education/2022/caravan-rental-scheme.pdf>

⁷ McAvooy, H. All Ireland Paper on Fuel Poverty and Health, (Dublin, Institute of Public Health in Ireland, 2007)

Research carried out by National Traveller MABS in 2019 found that 77% of Travellers living in trailers were living in energy poverty due to the poor insulation and lack of energy efficient measures⁸. A follow up study carried out in 2022 showed that a large majority of the Traveller families living in trailers surveyed ($\approx 75\%$) were paying between €120 - €360 on electricity, and €105- €400 on heating fuels (i.e. gas, coal wood) on a monthly basis⁹. The energy expenditure estimates from the survey carried out in this research were similar to that in the 2019 report showing that there has not been any significant improvement in reducing energy costs for Travellers living in trailers in the intervening years. The data was collected prior to the energy crisis price increases so we can safely assume that those figures have increased even further in the past two years.

National Traveller MABS research has clearly demonstrated that no residential standard trailers are less fuel efficient than those manufactured to a residential standard and the vast majority of trailers being lived in in Ireland are not residential standard. These trailers cost a huge amount to heat and it is virtually impossible to retain heat once the heat source is extinguished due to lack of insulation and double glazing. This therefore has implications for household expenditure and fuel poverty.

Recommendation: National Traveller MABS recommends that all local authorities support Travellers to access residential standard trailers and that all units provided to Travellers by the local authority be residential standard.

Local authorities in conjunction with SEAI and the Department of Climate and Communications and the Department of Housing Local Government and Heritage should facilitate energy efficiency information initiatives for Travellers living in trailers. This will start with modest targeted efforts and will hopefully produce a track record of success by focusing on accessible energy efficiency measures (i.e. the use of LED lights) that would

⁸ Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

⁹ National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-versionoct2022.pdf> ⁹ IBID

contribute to reduced energy spend⁹. This could be achieved by employing and training Travellers in each local authority area to act as trusted energy champions within the Traveller community. These energy efficiency information initiatives should be included in the Traveller Accommodation Programme as they should be offered in conjunction with any retrofitting that is being carried out to Traveller accommodation in the local authority area.

Recommendation: Local authorities should facilitate energy efficiency information initiatives for Travellers living in trailers.

There is a need for more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers¹⁰. Local authorities are in a prime position to be at the forefront of these initiatives. With 77% of Travellers in trailers living in energy poverty in 2019 we know that the situation has only gotten worse over the intervening years¹¹. As part of retrofitting of Traveller specific accommodation and when planning new sites consideration should be given to the installation of green energy technologies. These could include the installation of wind turbines on sites which would have the potential to power the entire halting site, removing the need for commercial electricity and also allowing for the local authority to be able to sell energy back into the national grid. Another potential solution could be planning for the installation of solar panels on halting sites. Currently there are issues with installing panels on halting sites due to the tight dimensions of the bays and regulations regarding the closeness of structures to fire walls etc. With a little foresight and sound technological advice from technical experts in SEAI as well as grants from SEAI community funds etc. local authorities are uniquely positioned to be at the forefront of incorporating green technologies into Traveller specific accommodation as well as addressing and reducing fuel poverty among the community.

¹⁰ National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-finalversion-oct2022.pdf>

¹¹ Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

Recommendation: Local authorities should include more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers in the Traveller Accommodation Programme.

Community Consultation

Community consultation is important for local authorities in drawing up a Traveller Accommodation Programme in Ireland for several reasons:

1. Inclusivity: Community consultation ensures that all stakeholders, including members of the Traveller community, have a voice in the decision-making process. This helps to create a more inclusive and representative programme that meets the needs of all residents.
2. Transparency: Consulting with the community helps to build trust and transparency in the decision-making process. It allows residents to understand the rationale behind decisions and provides an opportunity for feedback and input.
3. Local knowledge: Local residents often have valuable insights and knowledge about the needs and preferences of the Traveller community in their area. Consultation helps to tap into this local knowledge and ensure that the programme is tailored to the specific needs of the community.
4. Legal requirements: Local authorities in Ireland are legally required to consult with residents and stakeholders when developing Traveller Accommodation Programmes. Failure to consult can lead to legal challenges and delays in the implementation of the programme. Circular 35/2018 emphasizes the importance of local authorities working closely with representative bodies of the Traveller community.

Overall, community consultation is essential for promoting accountability, legitimacy, and effectiveness in the development of Traveller Accommodation Programmes in Ireland. It helps to ensure that the programme is well-informed, inclusive, and reflective of the needs and aspirations of all residents.

Recommendation: That a full and robust consultation with the Traveller community in the local authority's area take place.

Public Sector Duty

In Ireland, the public sector duty is a legal obligation placed on public bodies to promote equality and prevent discrimination in the delivery of their services. This duty is outlined in the Irish Human Rights and Equality Commission Act 2014 and applies to all public bodies in Ireland, including government departments, local authorities, and state agencies.

One area where the public sector duty is particularly relevant is in relation to the provision of Traveller accommodation. Travellers are an ethnic minority group in Ireland who have a specific accommodation need due to their nomadic and traditional way of life. Under the Housing (Traveller Accommodation) Act 1998, local authorities have a statutory obligation to provide adequate and appropriate accommodation for Traveller families.

In implementing the Traveller Accommodation Programme, public bodies are required to ensure that they are promoting equality and preventing discrimination against Travellers in the planning, design, and provision of accommodation services. This includes consulting with Traveller communities, ensuring that Traveller-specific needs are met, and taking measures to address any inequalities or barriers that may exist.

The public sector duty also requires public bodies to monitor and review their policies and practices to ensure that they are compliant with equality and human rights legislation. Failure to comply with the duty can result in legal action and potential sanctions.

Overall, the public sector duty in Ireland plays a crucial role in ensuring that Travellers are able to access adequate and appropriate accommodation that meets their specific needs and respects their rights as an ethnic minority group and it is imperative that it is taken into consideration in the Traveller Accommodation Programme.

Recommendation: That the Public Sector Duty be fully embraced by local authorities in the drawing up of the Traveller Accommodation Programme.

Equality Reviews

The lessons learned from the IHRC equality reviews should be adapted into the TAP to . The Irish Human Rights and Equality Commission is an independent statutory body in Ireland tasked with promoting and protecting human rights and equality. The Commission has highlighted the importance of equality reviews in assessing and improving Traveller Accommodation Programmes across Ireland. In a report published in 2021, the Commission highlighted the ongoing inequality and marginalisation faced by the Traveller community in accessing suitable and adequate accommodation¹².

The Commission emphasized the need for effective monitoring and evaluation of Traveller Accommodation Programmes to ensure that they meet international human rights standards and effectively address the needs of the Traveller community. The Commission called for a rights-based approach to be adopted in the development and implementation of these programmes, with a focus on ensuring the meaningful participation and consultation of Travellers in decision-making processes.

The Commission's stance on equality reviews and Traveller Accommodation Programmes is that they are essential tools in advancing human rights and equality for the Traveller community in Ireland.

Recommendation: The local authority should ensure that the learning from the equality reviews be adapted into the Traveller Accommodation Programme.

¹² IHRC, *Accounts of First Council-by-Council Equality Review on Traveller Accommodation in History of State* Published <https://www.ihrec.ie/accounts-of-first-council-by-council-equality-review-on-traveller-accommodation-in-historyof-state-published/>



Submission to the Development of the Traveller Accommodation Programme 2025 - 2029

by Irish Traveller Movement, National Traveller Women's Forum and Pavee Point Traveller and Roma Centre

February 2024

Our Coalition: This report is submitted as a coalition of three national organisations which work towards achieving Traveller and Roma rights in Ireland.

The Irish Traveller Movement represent Traveller interests in national governmental, international and human rights settings, and challenge racism - individual, cultural and structural which Travellers face and promote human rights and equality.

Pavee Point Traveller and Roma Centre is a national non-governmental organisation working towards the attainment of human rights for Irish Travellers and Roma in Ireland and internationally since 1985.

The National Traveller Women's Forum is a network of Traveller women and Traveller organisations throughout Ireland that recognises the particular oppression of Traveller women in Irish society.

Traveller ethnicity

Travellers are an indigenous ethnic minority who, historical sources confirm, have been part of Irish society for centuries.

On the 1st of March 2017 Taoiseach Enda Kenny announced formal acknowledgment of Travellers as a minority ethnic group within the State.

Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029

The provisions of the *Housing (Traveller Accommodation) Act 1998 Act* provide for public input and consultation at all stages of the preparation and implementation of Traveller Accommodation Programmes. The following recommendations have been informed by current legislation, reviews of previous TAPs, and the insight and lived experience of our members.

1. **Adherence to Guidelines:** DHLGH (2023) Guidelines For The Preparation, Adoption And Implementation Of Local Authority Traveller Accommodation Programmes 2025-2029 be fully endorsed by Each Local Authority
2. **Community Consultation:** It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018 stated, local authorities should collaborate closely with representative bodies of the Traveller community. By involving the Traveller community and their representatives, first hand lived experiences and insights will greatly contribute to the success of the programme.
3. **Determining Need:** Traveller Accommodation Programme must relate to both the existing accommodation needs *and* the projected need that will arise during the period of the programmes, across a range of accommodation options including standard and group housing, permanent residential sites for caravan/trailer, and transient sites. There must be clear and measurable targets.
4. **Inclusion in Development Plans:** County, City and Local Area Development Plans must include objectives for the provision of accommodation for Travellers and the use of particular areas for that purpose.
5. **Alignment with Housing Strategies:** Traveller accommodation should be planned in an intersectional way, informed by Housing for All, The National Housing Strategy(s) for Disabled People 2019 – 2027, The Action Plan on 'Housing Options for our Ageing Population', Housing First (Homeless Strategy) and the National Youth Homeless Strategy.
6. **Adoption of Equality Reviews:** The Irish Human Rights and Equality Commission report of Equality Reviews recommended the implementation of these should form the next TAPs.
7. **Acceleration of Accommodation:** We call for prioritisation of provision to Traveller families in shared and overcrowded accommodation & for overcrowding to be phased out as a matter of urgency.
8. **Budgets:** Each local Authority should provide costing for the full implementation of the Traveller Accommodation programme 2025-2029, including Maintenance, Capital Projects and any other allocations to support TAPs.

9. **Alignment with Health Determinations:** We endorse recommendations of The Traveller Health Unit to the Eastern Region to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2025-2029. Health Impact Assessments should be a prerequisite in the design of Traveller accommodation. They should also be undertaken on existing accommodation and reviewed during the lifetime of the TAP.

10. Map Traveller Accommodation in the TAP:

- Each TAP should reflect the OPR's recommendation as referred in the DHLGH Circular 28/2022 Case Study Paper '*Traveller Accommodation and the Local Authority Development Plan*, that local authorities improve linkages between the Traveller Accommodation Programmes, whether existing or amended, and their Development Plans.
- Map sites in the TAP for the purpose of transient provision.

11. **Public Sector Duty:** The TAP should state the Council's statutory obligation under the Public Sector Duty to eliminate discrimination and promote equality. The cultural needs of Travellers should be considered and assessed during the course of the consultation process.

12. **The indigenous requirement** should be reviewed to ensure there is no discrimination when compared to the requirements of the wider community in accessing social housing, i.e. it should be discretionary, rather than conclusive, to prevent potentially unlawful discrimination against Travellers.

13. **An Environmental Health Framework:** Environmental and Climate Change considerations should be factored into the planning of Traveller Accommodation and include prioritised energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

14. **Play facilities** should be provided in Traveller specific accommodation in line with Action 61 in NTRIS¹.

15. **A Human rights-based Approach** to Traveller Accommodation to be implemented, including Anti-Racism Training for local authority staff and public representatives.

16. **A General Ethnic Identifier** should be used within the social housing application, as is best practice within a human rights framework, rather than a Traveller only question, and data should be collected specifically in each council for Travellers experiencing homelessness and reported via PASS.

17. **LTACC:** There is a need for each LTACC to have an independent chair. Each LTACC should produce an annual report, and have TAP as a standing item, including progress reports.

18. **Midterm review** of the Traveller Accommodation Programme should take into consideration the development of the future TAP Programme 2030-2034, with an awareness and understanding of future and projected need.

Traveller Accommodation Legal and Policy Obligations

Government commitment to Traveller accommodation is manifested under legal and policy instruments including The Housing (Traveller Accommodation) Act, 1998. The Act mandated Local Authorities

- a) to deliver culturally appropriate accommodation in all its forms, including: halting sites, group housing schemes, standard houses and transient accommodation in the Republic of Ireland to Travellers.
- b) establishment of Local Traveller Accommodation Consultative Committees, LTACCs, in each Local Authority area to advise on the provision and management of accommodation for Travellers.

*The Planning and Development Act 2000*², as amended, also requires that the land use aspects of TAPs should be reflected in the local authority's development plan. Under Section 10(2)(i) of the 2000 Act the development plan must include objectives for "the provision of accommodation for Travellers, and the use of particular areas for that purpose."

*Development Plan Guidelines 2007*³, was issued by the Minister under Section 28 of the 2000 Act, stipulating the approach of the development plan in addressing the accommodation needs of the Traveller community.

The Housing Need and Demand Assessment (HNDA), which emanates from the National Planning Framework (NPF), requires specifically, to address specialist needs categories including Traveller accommodation.

*The Programme for Government 2020*⁴, focused on ensuring that the accommodation needs of the Traveller community are met by local authorities and that capital funding programmes for such accommodation are drawn down and utilised.

*Housing for All 2021*⁵, has a remit to increase and improve the output of Traveller-specific accommodation, and a commitment by the Government to work with Local Authorities and AHBs.

*Land Development Agency Act 2021*⁶ under section Services to local authorities, 15 (1) (a) 'A local authority may request the Agency; to provide services to it in relation large scale, multi tenure or mixed-use development sites that may include sites that are fully or partially intended to secure the implementation of all or part of an accommodation programme, within the meaning of the Housing (Traveller Accommodation) Act 1998.

*The National Youth Homelessness Strategy*⁷, obligates councils to

- a) Include specific actions in future Traveller Accommodation Programmes (TAPs), to address youth homelessness'.

b) Work with the LTACCs to consider and put in place any additional supports that are required at a local level to assist young Travellers who are at risk of experiencing homelessness’.

Moratorium Part 8⁸ of the planning process The temporary time-limited moratorium on Part 8 of the planning process, January (2023) had a potential benefit for councils in the acceleration of Traveller specific projects.

Policy Reforms and Reviews since the TAP 2019-2024

The Traveller Accommodation Expert Review 2019⁹. The report sets out an integrated set of recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. These recommendations address four key themes: delivery reflecting need, planning, capacity and resources, and governance.

The Irish Human Rights and Equality Commission Equality Review (2019)¹⁰ The Commission invited 31 local authorities to undertake a review of their provision of Traveller accommodation and to conduct a review of the practices, procedures and other relevant factors in relation to the drawdown of capital funding and the provision of Traveller-specific accommodation services.

The Office of the Planning Regulator conducted a Case Study Paper entitled *Traveller Accommodation and the Local Authority Development Plan 2021¹¹*, and surveyed existing local authority development plans (1) and Traveller Accommodation Programmes (2) (TAP) to examine links between their policies and objectives relating to Traveller-specific accommodation. The purpose was to address knowledge gaps, to provide support for local authorities in performing their duties and to highlight best practice to foster shared learning.

Current Need

During the course of the current TAP 2019 – 2024, Ireland’s housing crisis has grown to unprecedented levels. The demand on housing and social housing stock has accelerated, in November 2023, over 13,500 people were in emergency accommodation, including 4000 children.¹²

These figures would undoubtedly increase if they were to be based on the ETHOS definition of homelessness, which includes overcrowding and couch surfing. In December 2023, only 3% of rental accommodation was available through HAP¹³. The housing crisis has a disproportionate impact on Travellers, who already face discrimination when accessing private rental accommodation. Over 8,000 Travellers are in need of accommodation, including 2000 families in overcrowded or emergency provision, or roadsides. Additionally, 13% of all homeless adults nationally were

Travellers¹⁴. As a comparator to national homeless findings (children and adults), this could equate to 1 in 5 Travellers as homeless, as a low estimate.

Social Housing Delivery Trends.

Delivery Rate Comparisons: 10,263 social homes were delivered in Ireland under Housing for All for in 2022 7,433 of these were new-build, 5,196 in 2021 and 5,073 in 2020. No Traveller specific builds were delivered under the Plan.

Comparing further for the 3-year period 2019-2022 of all local authority New builds with the rate of local authority Traveller new builds, nationally 5,771 units were built in 2019, in 2020 2,230 units and in 2021 1,998 units, a total of 9,999. For the same 3-year period only 44 units of Traveller accommodation were built by local authorities.¹⁵

Need for Traveller for Traveller Homelessness Task Forces.

National Homeless Action Committee (NHAC). There is no national audit or assessment of the need for Traveller homelessness. Homeless services and agencies do not collect Traveller data. Local authorities are responsible for the adoption of Homelessness Action Plans that address the challenges for all homeless people including Travellers, but an audit¹⁶ of local authority Traveller Accommodation Programmes (2014-2019) showed only some local collect data for those in Emergency or homeless accommodation, and 12 of the 31 did not record data with most deferring duty to homeless services. There is a specific urgent need for action focussed local Traveller Homelessness Task Forces, and a central Traveller Strategy with specific intersectional priorities based on disability, children, at risk of homelessness, single parenting and domestic violence.

Demographic trends since the last TAP

Population Data – The recent Census provides some suggestive baseline of community demographic patterns, however, is not a total count or assessment nationally. The rate of completion of the ethnic question by Travellers was enumerated in 2022 as 32,949 people¹⁷. The more accurate account is found in figures compiled by the Department of Housing / Local Authority annual estimates (November 2022) accounting for approx. 48,732 people working off a household size of 4.

The current Traveller family count nationally shows (2022)¹⁸ shows an increase of 381 families from the previous year. Further increases are found in the rate of overcrowding with an additional 79 Families Sharing (828 to 907) and (167 more families living on Unauthorised Sites (487 to 654). In total, culminating in a rate of need to approx. 3,500 people.

County trends indicate growth rates as follows: A population growth rate of 6% nationally, with the largest growth in Offaly (up 30%), Fingal (up 17%), Tipperary (up 17%), and Cork (up 11%). However, the number of Travellers enumerated in some counties fell between 2016 and 2022, including Longford (down 13%) and South Dublin (down 12%).¹⁹

Consultation

It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018²⁰ stated “It is essential that Traveller Accommodation Programmes are prepared in a consultative manner. The Act requires that housing authorities consult with adjoining housing authorities, the HSE, approved housing bodies, the Local Traveller Consultative Committee, other local Traveller representative groups, community and interest groups and the public in general. The purpose of broad consultation ensures that the interests of all concerned with or affected by proposals for Traveller accommodation are considered and to facilitate a planned and comprehensive response by housing authorities to the accommodation needs of Travellers’.

Consultation Process

We strongly recommend compliance of the National Traveller Accommodation Consultative Committee (NTACC) guidelines regarding Traveller consultation at local level and on LTACCs, in the preparation and implementation of TAPs and propose a timeframe to allow for consultation with community and their representative groups, within plans. Please see Appendix A for Operation and membership of Local Traveller Accommodation Consultative Committee’s (LTACCs) based on NTACC’s Guidelines.

Under Section 42 (Appendix B) of the *Irish Human Rights and Equality Act 2014*²¹ all public bodies in Ireland, including Local Authorities, have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, the PublicSector Equality and Human Rights Duty.

Statement of Strategy

The 6th TAP should be bound by SMART principles, Specific, Measurable, Achievable, Relevant and Time bound. This should be stated within the strategy statement and be reflected within the TAP. This can be achieved through setting targets and timeframes for both the delivery of accommodation and for Traveller accommodation service improvements.

Assessment of Needs

We recommend that local Traveller organisations should be involved in carrying out the assessment of need. In the case where local Traveller organisations have developed their own assessments, the local authority needs to take these into consideration when compiling figures. The assessment of need must include for: Halting sites, Accommodation for Nomadic families- transient halting sites are relevant to the “annual patterns of movement of Travellers”, so it must take account of nomadic families. The

assessment must also take account of present and future needs during the lifetime of the programme.

Traveller Accommodation Expert Review July 2019²²

This report set out an integrated set of 32 recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. The following recommendations are particularly relevant to the development of Traveller Accommodation Programmes.

Expert Review Recommendation A.8:

“Commission research on homelessness among Travellers and ensure that the particular accommodation challenges and preferences of this group are addressed in relevant strategies to combat homelessness.”

To align with this policy objective, Local Authorities should submit the current number of Travellers in emergency accommodation and number registered as homeless.

Expert Review Recommendations (A.3a and 3b),

Information on Travellers currently accommodated in RAS, HAP and Rent Supplement funded dwellings. This would require the inclusion of an ethnic identifier in applications for these housing allowances and the collation of data currently recorded by the Department of Employment and Social Protection (in the case of Rent Supplement) and on each local authority's 'transfer list' (in the case of RAS and HAP).

b. An in-depth nationwide survey of the characteristics of the Traveller population, their location and accommodation, commissioned from an independent, expert provider. This survey would provide more detailed information on Travellers' mobility patterns, family formation, existing accommodation tenure and conditions, and future accommodation preferences. It could also be used to inform the ongoing review of the accuracy of the Social Housing Assessments, as recommended above.

Traveller Specific Accommodation

The Office of the Planning Regulator ²³ identified as best practice, the need for Local Authorities, in planning for Traveller accommodation to:

- Provide recognition of the cultural requirements of members of Travellers in regard to accommodation.
- Prioritise community integration, access to services and supporting cultural infrastructure associated with Traveller culture.

In relation to Traveller-specific accommodation (group housing schemes, halting sites and transient sites) developments planned the following should be identified:

- Timeline
- Number of units
- Site for development should be identified and mapped.
- Indicative budget requirements

Development of Transient Sites

The DHLGH Guidelines and Circular 35/2018 underpin the recommendation of reviewing evidence of the assessment basis and survey methodology used to determine the need for a transient site, and future proofing specific delivery targets for transient provision, which can be identified and mapped in both the TAP and the Development Plan. This is a statutory obligation of the Traveller Accommodation Act 1998 Transient Accommodation should be provided simultaneously with the other types of accommodation.

Tenant Participation

The degree to which Travellers are involved in the development of accommodation options and supported to play a full and meaningful role in the management of such, is central to building and sustaining a successful Traveller Accommodation Strategy. Benefits of tenant participation include the generation of greater ownership within communities, resulting in tenants becoming more involved in the sustainability of their overall living environment; encourages dialogue between the housing authority officials and residents; moves the operational context from complaints to a plan of action based on need and develops an understanding of Traveller issues and builds new relationships between all involved.

Caravan Loan Scheme

We welcome the roll out of the Caravan Loan Scheme due for 2024 and recognise the hard work done to date. The Department confirm a review of the scheme will be conducted in 2024 and gives some reassurance to national and local Traveller organisations who continue to raise concerns about pace needed to meet the demand.

Fire Safety in Traveller Accommodation

The National Directorate for Fire and Emergency Management was mandated to lead and oversee at the national level a programme to review fire safety in local authority provided Traveller accommodation, following the tragic loss of life on 10th October, 2015 of ten members of an extended Traveller family living in local authority provided

Traveller accommodation in Carrickmines, Dublin. Under direction from the NDFEM, local authorities undertook a major exercise aimed at enhancing fire safety in Traveller accommodation in 2015/16.

An update to the NTACC on Local Authorities Fire Safety Measures for the period 1st September 2016 – 31st August 2019 was published in May 2022. There have been no subsequent reports by local authorities. Fire safety must be prioritised by local authorities, with regular reports on safety measures published and updated fire safety training provided. Fire safety should be part of the ongoing work of The Local Traveller Accommodation consultative Committee (LTACC).

Proposed Checklist for development of Traveller Accommodation

Programmes 2025 - 2029

Consultation	<ul style="list-style-type: none"> • Was there engagement with the LTACC, local Traveller organisations and stakeholders at all stages of the development of Traveller Accommodation programme? • Did the LTACC sign off on the original TAP?
Current Need	<ul style="list-style-type: none"> • What is the total of units / families in need? • What methodology was used to assess need and is this independently verifiable • Has current need been determined by accommodation type; differentiated across, Traveller specific accommodation, group housing schemes, transient sites, halting sites, HAP/RAS, standard social housing, Approved Housing Bodies, single instance/one off rural housing. • What methodology was used to assess Traveller need for accommodation preferences? • with a narrative on reasons for delay or amendments.. (not sure what that is) • Has need increased or changed since the TAP was drawn up and targets now in need of revision?

Future and Projected Need	<ul style="list-style-type: none"> • What is the total number of units / families in future need by accommodation type per year and delivery planned across each type per year? • Is increased growth reflected, where need has outgrown the original assessment and are indicators of measurement detailed to support figures?
Recognition of Culture	<ul style="list-style-type: none"> • Does the TAP identify the Council's statutory obligation under the Public Sector Duty to eliminate discrimination and promote equality? • Have the cultural needs of Travellers been considered and assessed? • Indigenous Requirement and Local Connection Rule • If the TAP references an indigenous requirement, has this been reviewed to ensure there is no discrimination when compared to the requirements of the wider
	community in accessing social housing, i.e. where it should be discretionary, rather than conclusive, to prevent potentially unlawful discrimination against Travellers
Homelessness	<ul style="list-style-type: none"> • Are figures provided on numbers of Travellers / families in homeless accommodation?
Budget and Planning	<ul style="list-style-type: none"> • Are timelines, site locations, target units and budgets identified for Traveller specific accommodation projects and have progress updates on each been provided? • Have these been mapped (or now amended to be) in line with the recommendations of the OPR report, in both the TAP and the Development Plan? • Have transient sites been assessed and planned for?

Appendices

Appendix A

Summary of Requirements for the Traveller Accommodation Programmes Provided in the DHLGH Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025-2029²⁴

- The Minister has, under section 6(1) of the 1998 Act, directed that relevant housing authorities for the purposes of preparing a Traveller Accommodation Programme in the functional area concerned, make an assessment of the accommodation needs of Travellers who are assessed under S.20 of the Housing (Miscellaneous Provisions) Act 2009 as being qualified for social housing support, including the need for sites.
- The Minister has given a direction under section 6(5) of the 1998 Act, specifying that relevant housing authorities shall make an estimate of the projected accommodation needs of Traveller families arising during the duration of the programme (1 January 2025 to 31 December 2029).
- Under section 10(2)(b) of the Act the Minister has directed that the information in relation to the needs to be met by the programmes shall be in summary form but in sufficient detail to show the needs for all categories of Traveller accommodation and the general area in which the accommodation is required.
- The Minister has directed under section 10(2) of the 1998 Act that annual targets be included in the programmes in respect of the implementation of the programmes. The targets should include details of the numbers of units of accommodation proposed to be delivered for each of the five years of the programme for Traveller specific accommodation (group housing, bays on halting sites, including transient sites) both new and refurbished and for standard housing.
- Under section 7(4) of the Act the Minister has specified 31 December, as the latest date by which accommodation programmes must be adopted.
- The Minister has, under section 10(1) of the 1998 Act, directed that the next accommodation programme should be for a period of 5 years and that the programme shall begin on the 1st of January 2025.
- The Minister has, under section 17(1) of the 1998 Act, directed that a review of the next accommodation programme should be carried out no later than 30th June 2027.

Appendix B

Operation and membership of Local Traveller Accommodation Consultative Committee's (LTACCs)

The following recommendations are based on the NTACC's Guidelines.

1. LTACCs are to advise the appointing authority in relation to: The provision and management of accommodation for Travellers.
2. Nomination procedures need to be inclusive and transparent and Traveller representatives appointed should be positioned to represent the overall Traveller population in each area. In areas where local Traveller accommodation organisations

exist, these groups should nominate their own representatives, where local groups do not exist, national Traveller organisations should be a point of reference to local authorities.

3. The preparation and implementation of any accommodation programme for the functional area of the appointing local authority. The issue of management of Traveller accommodation and discussion of individual accommodation cases, should not feature within the scope of the work of LTACCs.

4. Operation practice: LTACCs should meet a minimum of 4 times a year, as laid out. In accordance with the Housing Traveller Accommodation Act 1998 and NTACC guidelines.

The Director of Services should report in person to every meeting of the LTACC.

5. The overall objective of the LTACCs is to ensure Traveller Accommodation Programmes are implemented in full. In order for this to happen LTACCs should embed annual monitoring indicators offset against TAP annual targets and its own work plan. Process, as well as delivery, should be monitored by the LTACC.

6. The LTACC should produce an Annual Report including a summary of activities in the period. Copies of this Report should be given to the appointing Local Authority as well as a copy sent to the National Traveller Accommodation Consultative Committee.

7. The LTACC should formally report to the appointing Local Authority Manager & Director of Services twice a year. The Manager and Director of Services should formally be asked to meet with the LTACC once a year, on completion of the LTACCs Annual Report.

8. LTACCs are crucial to the success of TAPs. In cases where LTACCs are not functioning the national accommodation officer of the ITM are available to assist.

9. Ensure 'Memorandums of understanding' to inform the work practices of LTACC's and ensure an effective and pragmatic approach to working in partnership with positive duty obligations as per Section 42 of the IHREC Act (2014) for members of the LTACC.

Appendix C

Irish Human Rights and Equality Commission Act 2014, S.42

Public bodies

42. (1) A public body shall, in the performance of its functions, have regard to the need to— (a) eliminate discrimination,

(b) promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and

(c) protect the human rights of its members, staff and the persons to whom it provides services.

(2) For the purposes of giving effect to subsection (1), a public body shall, having regard to the functions and purpose of the body and to its size and the resources available to it—

(a) set out in a manner that is accessible to the public in its strategic plan (howsoever described) an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body and the policies, plans and actions in place or proposed to be put in place to address those issues, and (b) report in a manner that is accessible to the public on

developments and achievements in that regard in its annual report (howsoever described).

(3) In assisting public bodies to perform their functions in a manner consistent with subsection (1), the Commission may give guidance to and encourage public bodies in developing policies of, and exercising, good practice and operational standards in relation to, human rights and equality.

(4) Without prejudice to the generality of subsection (3), the Commission may—

(a) issue guidelines, or

(b) prepare codes of practice in accordance with section 31, in respect of the development by public bodies of performance measures, operational standards and written preventative strategies for the purpose of reducing discrimination and promoting human rights and equality in the public sector workplace and in the provision of services to the public.

(5) Where the Commission considers that there is evidence of a failure by a public body to perform its functions in a manner consistent with subsection (1) and that it is appropriate in all the circumstances to do so, the Commission may invite the public body to—

(a) carry out a review in relation to the performance by that body of its functions having regard to subsection (1), or

(b) prepare and implement an action plan in relation to the performance by that body of its functions having regard to subsection (1), or both.

(6) A review or an action plan under subsection (5) may relate to— (a) equality of opportunity or human rights generally, or (b) a particular aspect of human rights or discrimination, in the public body concerned.

(7) The Commission may, and, if requested by the Minister, shall, review the operation of subsection (1).

(8) For the purposes of assisting it in carrying out a review under subsection (7), the Commission shall consult such persons or bodies as it considers appropriate.

(9) Where the Commission carries out a review under subsection (7) it— (a) may, or

(b) where the Minister has requested the review, shall, make a report of the review to the Minister and any such report shall include such recommendations as the Commission thinks appropriate.

(10) The Commission shall cause a copy of the report to be laid before each House of the Oireachtas.

(11) Nothing in this section shall of itself operate to confer a cause of action on any person against a public body in respect of the performance by it of its functions under subsection

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²⁴ DHLGH (2023) *Guidelines For The Preparation, Adoption And Implementation Of Local Authority Traveller Accommodation Programmes 2025-2029*



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7th February 2024

To: The Traveller Accommodation Unit

From: Aishling Heffernan, Chair of the HSE National Traveller Health Implementation Group

**Submission by the National Traveller Health Implementation Group to the consultation
process for Traveller Accommodation Programmes 2025-2029**

To whom it concerns

The National Traveller Health Implementation Group (NTHIG) was established to oversee implementation of the National Traveller Health Action Plan 2022-2027 (NTHAP). The plan sets out to address serious inequalities in Traveller health over the five-year period. Travellers have significantly poorer health outcomes than the general population, including higher mortality rates, higher infant mortality rates, lower life expectancy, higher suicide rates and higher rates of chronic disease. Goal 3 of the NTHAP 'to address the social determinants of Traveller health through targeted and mainstreaming measures' includes a series of actions related to the social factors that affect Traveller health. Accommodation is a key social determinant of health and there are a number of accommodation related actions in the NTHAP, which include the HSE working in partnership with the local authority.

We welcome the opportunity to make a submission to the Traveller Accommodation Programme 2025-2029 consultation process. We would also welcome further engagement with our Local Authority colleagues to work in partnership through local and regional structures in relation to addressing the accommodation related social determinants of Traveller health as part of the implementation of the National Traveller Health Action Plan.

Thank you in advance for your consideration of this submission.

Kindest regards

Aishling Heffernan

**Chair of the National Traveller Health Implementation Group, Chief Officer Community
Health Care East**



TRAVELLER HEALTH STATUS

Travellers experience significant health inequalities as a result of social determinants of health. Mortality rates in the Traveller community are 3.5 times higher than non-Travellers with life expectancy 13.3 years less. The rate of suicide amongst Travellers is 6 times higher than in the general population and accounts for around 11% of all Traveller deaths. Infant mortality rates in the community is 4 times higher than in the general population, with chronic health conditions disproportionately affecting Travellers contributing to the mortality gap. This is seen in higher rates of cardio vascular disease, diabetes and hypertension (12% diagnosed with diabetes and over 10% with undiagnosed diabetes).

SOCIAL DETERMINANTS OF HEALTH

The social determinants of health (SDoH) are the non-medical factors that influence health outcomes. They are the conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life. Accommodation is a key determinant of health. The AITHS found that the better accommodated a Traveller family is the better their health status, stressing the importance of good quality accommodation and amenities in supporting and maintaining good health. The importance of access to good quality accommodation to enable and support positive health including mental health cannot be underestimated. For those living in Traveller specific accommodation, TAPs need to ensure well-maintained sites that are located close to local amenities, with proper sanitation facilities, energy efficient homes, adequate space for families and play facilities for children, as these are essential in supporting and enabling good health outcomes.

PARTNERSHIP WORKING

NTHAP is underpinned by partnership working; this includes HSE Public health, regional Traveller health structures and HSE social inclusion staff working alongside local authorities and government departments, as appropriate, to address the social determinants of Traveller health (Action 36). We welcome the continuation and strengthening of this partnership as part of the Traveller Accommodation Programme. We see an important role for Public Health in supporting and advising the Local Authority in ensuring Traveller accommodation enables and supports good physical and mental health through various means including the provision of Health Impact Assessments for existing and planned Traveller Accommodation in the lifetime of the TAPs.

ETHNIC EQUALITY MONITORING

A key element in ensuring adequate provision of Traveller accommodation is to ensure the robust monitoring processes. These processes can be supported by ensuring implementation of ethnic equality monitoring, including the introduction of a standardised ethnic identifier in line with the national census, across all relevant local authority data sets. This includes datasets for social housing and accommodation, allocations of social housing and accommodation and on homelessness. While we acknowledge that there have been some improvements in relation to data collection, including the addition of a question to capture Travellers in the social Housing Support application form, we recommend this be amended and updated as a universal ethnicity question (as per the census) in line with a human rights based approach.



7. That anti-racism and cultural awareness in-service training are undertaken by LTACC members as Local Authority staff as per Section 42, Irish Human Rights and Equality Act (2014).

Appendix 1- NTHAP relevant actions

Consolidate the public health measures put in place to minimise the impact of COVID-19 and other communicable diseases on Travellers, including primary childhood immunisation programmes, control of outbreaks such as hepatitis A, and COVID-19 vaccinations.	HSE Public Health + Local Authorities + other relevant agencies.	NTHS (Action 79) Healthy Ireland: A Framework for Improved Health and Wellbeing
Public Health Departments and regional Traveller Health Structures to work in partnership with local authorities and Government Departments, as appropriate to address the social determinants of Traveller Health.	HSE Public Health + other relevant agencies.	Healthy Ireland: A Framework for Improved Health and Wellbeing

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12th February, 2024

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Dear Ms Philips,

Please find for your consideration the submission from the Traveller Health Services in the Midwest Region to the Traveller Accommodation Programme 2025-2029

In this submission, we have highlighted five key areas which affect Travellers' health and are existing policy commitments which we believe needs to be taken account of in the development of the Traveller Accommodation Programme (TAPs)2024-2029. Namely:

1. Delivery and accountability of TAPs
2. Impact of accommodation policy as a driver of the social determinants on health
3. Impact of dispersal & private rented accommodation policy
4. Public health and environmental concerns
5. Safety of Traveller Children

We believe it is imperative that the health impacts, including public health concerns, of the living environment are seriously addressed in the development of the new TAPs.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Marie Boyle'.

Marie Boyle,
General Manager, Social Inclusion, Midwest Community Healthcare



Submission to Local Authorities Traveller Accommodation Plans (January 2024)

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The Regional Traveller health infrastructure is comprised of a core Traveller health staff team, a Traveller Health Unit and associated sub-groups, a Traveller health budget and links across the range of health directorates and services in MWCH and with external organisations to promote overall Traveller health and wellbeing issues.

The PHCPs employ Traveller Community Health Workers and other workers on a part-time basis, and they undertake health advocacy in a range of health arenas, e.g., mental health, health education; child and infant health; immunisation and health alerts; addiction; diet and exercise; health and well-being; women's health; men's health; and social determinants work including accommodation and environmental health issues. The reality is that the general physical and mental health of members of the Traveller Community is much worse than that of the general population. The key objective of our services is to enhance Traveller health status, improve the capacity of mainstream health services to respond to Traveller needs while acknowledging that social determinants of health are at the root of Traveller health inequalities. This work is underpinned by a partnership approach, which is crucial in supporting collective and coordinated responses to addressing Traveller health inequalities.

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70

Introduction

Mid West Community Health Care Traveller Health Service welcomes the opportunity to make this submission to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2024-2029 in this region. We acknowledge some progress has been made in the provision of Traveller accommodation during the last TAP and the work of Local Authority staff that contributed to making that possible. We would also like to acknowledge the positive relations between HSE staff and the local authorities in this region in working collaboratively in Traveller inter-agency work over many years. This was particularly evident during COVID-19 whereby HSE (including HSE Public Health), local authorities and the HSE worked positively together to try to mitigate the worst of the impact of the virus among Travellers. It is imperative that this positive engagement continues going forward given the importance of accommodation in relation to the social determinants of health.

Traveller Health Units (THU) were established in each Health Board area as recommended by the Task Force on Travelling People (1995). When the HSE was later established, a review was undertaken of THUs and it was recommended that they continue to operate on their original geographical area base. The Traveller Health Service in the Midwest Region covers Limerick, Clare and North Tipperary.

The aim of the HSE Traveller Health Service is to prioritise Traveller health at the local and regional level by:

- Monitoring the delivery of health services to Travellers and setting regional targets against which performance can be measured;
- Ensuring that Traveller health is given prominence on the agenda of the HSE;
- Ensuring coordination and liaison within the HSE, and between the HSE and other statutory and voluntary bodies, in relation to the health situation of Travellers;
- Collection of data on Travellers' health and utilisation of health services;
- Ensuring appropriate training of health service providers in terms of their understanding of and relationship with Travellers;
- Supporting the development of Traveller specific services, either directly by the HSE or, indirectly through appropriate voluntary organisations.

In this submission, we highlight five key areas, which affect Travellers' health, which are existing policy commitments which we believe need to be taken account of in the development of the Traveller Accommodation Programme 2025-2029. Namely:

1. Delivery and accountability of TAPs
2. Impact of accommodation policy as a driver of the social determinants on health
3. Impact of dispersal policy and slow pace in development of Traveller specific accommodation
4. Environmental concerns and their effect on health
5. Safety of Traveller Children

Recommendations for Traveller Accommodation Programmes

1. Support delivery of robust TAPs through accountability

Recommendations:

- Build on relationships established during COVID between Local Authorities and HSE Public Health to support and enable the provision of Traveller accommodation that supports and maintains good physical and mental health of Travellers.
- Ensure representation from Travellers on LTACC, nominated through Traveller organisations where Traveller organisations do not exist, NTACC to support nominations. Set a minimum number of representatives to ensure meaningful representation.
- Health Impact Assessments should be a prerequisite in the design of Traveller accommodation. They should also be undertaken on existing accommodation and reviewed during the lifetime of the TAP.
- Communications should reflect accommodation of low literacy levels, and supports should be offered to enable communications to be meaningful.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop and publish annual progress TAP reports to monitor progress; reports to be submitted to the Department of Housing Local Government and Heritage.
- Local Authorities should make available training in anti-Traveller racism and Traveller Cultural Awareness for LTACC members.

2. Address the Social Determinants of Health

Recommendations:

- Culturally appropriate Traveller-specific accommodation should be developed, and the needs of nomadic Travellers catered for *through provision of transient sites as recommended in the Housing (Traveller Accommodation) Act 1998*.
- Traveller organisations should be directly involved in the accommodation needs assessments to capture the existing needs and projected needs as per TAP guidelines. This should be inclusive of Traveller families who are homeless and living on unauthorized sites.
- Needs of older Travellers, Travellers with a disability and Traveller children need to be specifically taken into account in developing the TAP.
- Local Authority staff should receive in-service anti-racism and discrimination training in order to comply with positive duty obligations and fulfil commitments as per the National Plan Against Racism.
- Education providers to be included in the development of TAPs to ensure and to support education providers in understanding Traveller education needs in their locality.

3. Recognition of the impact of dispersal & private rented accommodation policy in Traveller homelessness

Recommendations:

- Traveller-specific accommodation should be provided for in the TAP.
- Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation, with input from Travellers themselves.
- A universal ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS.

4. Ensure a holistic approach to Traveller accommodation needs, including environmental concerns and their effect on health

Recommendations:

- A framework for improving environmental health in Traveller accommodation should be developed and incorporated into the TAP.
- Learning and mechanisms used to support the provision Traveller accommodation provision throughout COVID-19 should be utilised and mainstreamed into TAP processes.
- Walkability, safety, and transport need to be built into design of Traveller accommodation.
- We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.
- Environmental and Climate Change considerations to be factored into the planning of Traveller Accommodation.

Traveller Accommodation should be prioritised for energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

5. Future-proofing and ensuring the rights of Traveller children

Recommendations:

- National policies in relation to children, especially Better Outcomes, Brighter Futures, should be considered when planning the accommodation for Traveller Families.
- Play facilities should be provided in Traveller specific accommodation in line with Action 61 in NTRIS.
- The cultural rights of Traveller children should be taken into account in the planning and provision of Traveller accommodation.
- Childrens access to early childhood education, and mainstream education need to be considered and planned when planning Traveller accommodation.
- Child well-being indicators need to be factored into the TAP.

Traveller specific accommodation should be assessed in terms of its impact on children's well-being and the findings addressed in accommodation up-grading; maintenance or development.

1. TAP Delivery and Accountability

It is important from the outset to stress the need for TAPs to align with existing policy and legislation, including Public Sector Equality and Human Rights Duty¹; the National Traveller and Roma Inclusion Strategy (2017-2021)² and its soon to be successor strategy; Housing for All³; and the National Traveller Health Action Plan 2022-2027 (NTHAP).⁴ The NTHAP, launched in November 2022 sets out to address serious inequalities in Traveller health through targeted and mainstream measures, with a clear implementation strategy. Part of this strategy is the HSE close working with other public bodies that provide services that impact on Traveller health and wellbeing.

Accommodation is a key social determinant of health affecting both mental and physical health. Goal 3 of NTHAP 'Address the social determinants of health through targeted and mainstreaming measures' sets out to 'Ensure a whole of government and social determinants approach to addressing Traveller health inequalities in line with NTRIS, Healthy Ireland and Sláintecare'.

Fig. 2 Social Determinants of Health, NTHAP



¹ As per Section 42 of the Irish Human Rights and Equality Act (IHREC) 2014 has established a positive duty on public sector bodies to:

- eliminate discrimination
- promote equality of opportunity and treatment
- protect human rights

This means that all public bodies in Ireland, including Local Authorities, have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, called the Public-Sector Equality and Human Rights Duty.

² National Traveller and Roma Inclusion Strategy (2017-2021) <https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

³ Housing for All recognises that Travellers are overrepresented amongst the homeless population in Ireland and commits to a number of actions including working with Local Authorities and AHs to improve the quality and quantity of delivery of Traveller-specific accommodation.

⁴ National Traveller Health Action Plan 2022-2027: <https://www.hse.ie/eng/services/publications/socialinclusion/national-traveller-health-action-plan-2022-2027.pdf>

Traveller Health Service, HSE Mid West Community Healthcare, St. Joseph's Health Campus, South East Wing, Mulgrave St, Limerick V94 C8DV

NTHAP is underpinned by partnership working; this includes, HSE Public health and regional Traveller health structures working alongside local authorities and government departments, as appropriate to address the social determinants of Traveller health (Action 36). The importance of access to good quality accommodation to enable and support positive health including mental health cannot be underestimated. Traveller engagement with mainstream health services, and in particular, their capacity to act on advice from health professionals across all HSE services is contingent on access to good quality accommodation. For example, the adherence to public health measures throughout the COVID-19 pandemic was dependent on the availability of suitable accommodation, with space for isolation measures and appropriate sanitation facilities. Building on from partnership working between Local Authorities and HSE Public Health during COVID, we welcome the continuation and strengthening of this partnership as part of the Traveller Accommodation Programme. The health impacts of existing and planned traveller accommodation should be assessed.

The development of the NTHAP was informed by a consultation process that included 5 regional consultations (including representatives from Local Authorities). The process conceded that the current structures for Traveller accommodation (i.e.) LTACCs are not reaching their potential; often lacking meaningful Traveller representation, are poorly attended and do not have enforcement powers. Further, a consistent message from each consultation was slow and poor implementation of Traveller accommodation TAPs, despite allocated budgets and targets.

Low literacy levels exist among the Traveller population, and therefore, communications should reflect an understanding of this, possibly including support workers to follow up on communications.

The NTHAP consultation document stresses the need for current TAPs to ensure that budgets are spent for that purpose and is fully utilised, including the development of new accommodation where projected need is taken into account. Additionally, accountability for delivering Traveller accommodation is prioritised through a strong monitoring and evaluation framework.

Anti-Traveller racism and discrimination as well as a lack of Traveller cultural awareness affects the mental health of Travellers and can affect the planning and delivery of Traveller accommodation, through objections to proposed developments. NTHAP sees the provision of anti-racism and cultural awareness training as central to counteracting racism and ensuring appropriate cultural responses in addressing Traveller Health inequality. We are supporting the development of anti-racism and cultural awareness training in HSE services over the life of NTHAP. We suggest that councils take a similar approach in the making available anti-racism and cultural awareness training for initially for members of LTACCs. In addition, TAPs would benefit from actions to address anti-Traveller racism in the general community to support integration and improve Traveller mental and physical health.

Recommendations:

- Build on relationships established during COVID between Local Authorities and HSE Public Health to support and enable the provision of Traveller accommodation that supports and maintains good physical and mental health of Travellers.
- Ensure representation from Travellers on LTACC, nominated through Traveller organisations where Traveller organisations do not exist, NTACC to support nominations. Set a minimum number of representatives to ensure meaningful representation.
- Health Impact Assessments should be a prerequisite in the design of Traveller accommodation. They should also be undertaken on existing accommodation and reviewed during the lifetime of the TAP.
- Communications should reflect accommodation of low literacy levels, and supports should be offered to enable communications to be meaningful.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop and publish annual progress TAP reports to monitor progress;

- reports to be submitted to the Department of Housing Local Government and Heritage.
- Local Authorities should make available training in anti-Traveller racism and Traveller Cultural Awareness for LTACC members.

2. Social Determinants of Health

Improved accommodation can save lives, prevent disease, increase quality of life and reduce poverty. Our submission, in keeping with government policy, reflects a social determinants approach to health which recognises that some of the key determinants of health exist outside of the health care sector. This approach recognises that issues such as living conditions, educational attainment, employment status, racism, discrimination, and poverty all impact on health as reflected in Sláintecare, Housing for All and the National Traveller Health Action Plan. The vision of this Healthy Ireland Strategy is that *'we will have an Ireland where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility.'*

The latest Healthy Ireland Implementation Plan 2023-2027 affirms this vision and makes strong commitments to addressing health inequalities through a whole government approach. The Strategy also promotes partnerships and cross-sectoral working including greater collaboration between health services and Local Authorities

The All Ireland Traveller Health Study (AITHS) (2010) documented Travellers continue to have high mortality rates and low life expectancy. The study found that the life expectancies of the Traveller community today are comparable to life expectancies of the general population in the late 1940s for males and early 1960s for females. Some of the key findings in relation to mortality rates and life expectancy are as follows:

- Life Expectancy at birth for male Travellers has remained at the 1987 level which is 15.1 years less than men in the general population.
- Life expectancy for females is 11.5 years less than women in the general population.
- Traveller men have 3.7 times the mortality of males in the general population and for Traveller females the mortality is 3.1 times higher.
- Traveller infant mortality is estimated at 3.6 times higher than in the general population.
- Traveller suicide rate is 6 times higher than in the general population.

While the findings of the All Ireland Traveller Health Study were published in 2010, the veracity of its findings has been endorsed by a number of subsequent State surveys and research reports, including by the EU Fundamental Rights Agency in its 2019 Travellers in Ireland Survey, and more recently, by the national census which that 15% of Travellers reported experiencing at least one long-lasting condition or difficulty to a great extent or a lot compared with 8% of all people living in Ireland.⁵ Additionally, Census 2022 reported:

- Of all children under the age of 15 living in the State, 4% reported experiencing at least one long-lasting condition or difficulty to a great extent, compared with 7% of Traveller children.
- The proportion of 15- to 29-year-old Irish Travellers experiencing at least one long-lasting condition or difficulty to a great extent (13%) was more than twice that of all people in the same age cohort (6%).

⁵ <https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/#:~:text=Census%202022%20Results&text=The%20number%20of%20Irish%20Travellers,per%201%2000%20of%20the%20population.>

- Between the ages of 30 and 59, the proportion of the population experiencing at least one long-lasting condition or difficulty to a great extent, was over three times higher for Irish Travellers (21%) than the total population (6%)

The study indicated that access to a range of public service amenities was poor. Travellers are a very young population with 63% of Travellers under 25 years and a mere 3% over 65 years, the equivalent rate for the general population was 13.3%.⁶ The average Traveller family is comprised of a married couple with children had an average of 4 persons per household compared with 2.7 for the general population. The 2022 Census found that the majority of Travellers are living in standard accommodation, primarily by renting from a Local Authority.

However, we note in most recent figures published by the Department of Housing⁷, reports an 18% increase in Traveller families in sharing housing or living on the side of the road, on unauthorised sites, without access to basic facilities. This is in the context of severe overcrowding; with Traveller overcrowding seven times the national rate and disproportionate rates of Traveller homelessness.

As per the National Plan Against Racism, there is a recognition that systematic racism permeates throughout public services, adding further challenges to Travellers who are seeking appropriate support and accommodations provisions from their Local Authority. Therefore, the mainstreaming of anti-racism and discrimination in-service training for staff should be integrated into Local Authority processes.

Education is key social determinant of health. In the planning of Traveller Specific Accommodation, attention should be paid to how Traveller children and adults can access local education offerings. Education providers in the locality of planned developments should be included in the consultation process for development of Traveller specific accommodation with a view to raising awareness among those providers of the needs of the Traveller community, and ensuring those needs are included catered for locally.

Recommendations:

- Culturally appropriate Traveller-specific accommodation should be developed, and the needs of nomadic Travellers catered for *through provision of transient sites as recommended in the Housing (Traveller Accommodation) Act 1998*.
 - Traveller organisations should be directly involved in the accommodation needs assessments to capture the existing needs and projected needs as per TAP guidelines. This should be inclusive of Traveller families who are homeless and living on unauthorized sites.
 - Needs of older Travellers, Travellers with a disability and Traveller children need to be specifically taken into account in developing the TAP. Local Authority staff should receive in-service anti-racism and discrimination training in order to comply with positive duty obligations and fulfil commitments as per the National Plan Against Racism.
 - Education providers to be included in the development of TAPs to ensure and to support education providers in understanding Traveller education needs in their locality.

⁶ <https://www.cso.ie/en/releasesandpublications/ep/p-cp8iter/p8iter/p8itd/>

⁷ <https://www.gov.ie/en/collection/29c76-traveller-accommodation-statistics/#2022>

3. Impact of dispersal & private rented accommodation policy

The AITHS documented that the concept of Travellers as a community is integral to an understanding of their health status. Travellers self-identify, share a culture, and value systems, choose to socialise and congregate together and value immediate and extended family networks. Such 'social capital' is found to be good for your health.

Increasingly Local Authorities are accommodating Traveller families in the private rented sector—either in houses or apartments, with little Traveller specific accommodation provision being built. Lack of security of tenure is another emerging issue for Travellers with an ever-increasing number of Traveller families being accommodated through the private rented sector and the use of Housing Assistance Payment (HAP) and Rental Accommodation Scheme (RAS) scheme. Traveller families accommodated in this way remain invisible as Local Authority Social Housing Support/Assessment forms collect information on requests for Traveller specific accommodation, a request that is unlikely to be met by Local Authorities in the immediate future. While we acknowledge some progress in relation to the collection of ethnicity data by the Pathway Accommodation & Support System (PASS), through the implementation of a universal ethnic identifier, there are concerns that the social Housing Support application only applies this question to Travellers, which is contra to a human-rights based approach.

Where Traveller families are being accommodated in the private rental sector, particularly in rural areas, Traveller families are frequently being allocated accommodation in different towns posing difficulties in access to extended family members. These practices can contribute to a growing isolation among Traveller families and difficulties in accessing support from wider family members in child-rearing, baby-sitting, homework support, helping sick relatives, protecting women experiencing violence etc. They can also isolate Traveller families leaving them vulnerable to attack at times of community conflict. It can also expose children to discrimination from 'settled' neighbours at an early age. As indicated in Census 2022 Traveller families are being squeezed out of the private rental market and are being placed in vulnerable situations, including homelessness, with figures reporting that 14% of Travellers were living in "temporary accommodation," which effectively means Traveller families and children living on the side of the road, without access to basic facilities. Traveller families, like all families, find this situation very stressful and it is having a negative impact on their health.

The TAPs are a key driver to address the crisis of accommodation and disproportionate impact of homelessness among Travellers. It is estimated that 39% of Travellers are homeless according the ETHOS definition. Figures show from the Department of Housing that 1,561 Traveller families, or approximately 6,244 Travellers are living on the side of the road or doubling up in houses. It is important to note that Traveller families doubling/trebling up in bays, yards and facilities are not included in this dataset and therefore these figures underestimate the extent of the crisis. Women, in particular, are a particularly vulnerable group at risk of homelessness, and account for an estimated 50% of the homeless population, which is far higher than the national average. The impact of homelessness on Traveller women and children is profound; they experience layers of discrimination and have further difficulties in accessing public services, and can therefore be a "hidden" group of homeless.

The IHREC supports the analysis of Traveller homelessness, stating that "members of the Traveller Community are the most at risk of being homeless" and face further racism and discrimination in accessing housing in the public and private rental sector⁸. Local Authorities as the arbiter of culturally appropriate accommodation play a key role in preventing homelessness and the litany of

⁸ IHREC Discrimination and Inequality in Housing in Ireland, 2018

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health issues that are associated with this experience for Travellers, from isolation, addiction, domestic violence and increased risk of ill health and chronic conditions.

There is now a growing recognition in society that mental wellbeing is contingent on physical and social wellbeing. Perceived discrimination was a major problem for all Travellers documented in the AITHS. This, along with the evidence of a suicide rate six times the national average (and seven times for Traveller men), as well as the high numbers of Travellers who said their mental health was not good and that they experienced depression, indicates that accommodation provision is a key mediator of Traveller mental health, and that TAPs must take this into account.

Recommendations:

- Traveller-specific accommodation should be provided for in the TAP.
- Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation, with input from Travellers themselves.
- A universal ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS.

4. Environmental concerns and their effects on health

The National Traveller Health Action Plan recognises that importance of the environment in which Travellers are living as it relates to health outcomes. Many Travellers continue to live in very poor accommodation conditions and an unsafe physical environment which exposes families to communicable diseases such as influenza, rhinovirus, and infections. There is often a high level of overcrowding; damp problems; pest infestation and lack of basic facilities such as sewerage, public transport, paved roads, pedestrian pavements, and electric lighting. Illegal dumping and intermittent rubbish collection are problems highlighted by Travellers. Poor site design and drainage problems as well as environmental hazards from land adjoining Traveller accommodation are concerns for Traveller residents. The AITHS documented that few Travellers own their homes (less than 13% compared to 70% of other medical card holders). Some Travellers live under a constant threat of eviction. A quarter of families considered where they lived to be unhealthy or very unhealthy and 26.4% considered their place of residence unsafe.

The chronic deprivation seen across Traveller accommodation and public health issues that resulted from this were further exacerbated throughout the COVID-19 pandemic. Essential public health messages then, of hand-washing, social distancing and self-isolating to protect against COVID-19, were simply not possible for many Travellers who lived in overcrowded conditions and had no access to running water. Rates of Covid-19 infection were higher in the Traveller population throughout the pandemic. The provision of water, toilets, refurbishment, site works and additional mobile accommodation and space where there was overcrowding were made available due to the work of the THUs, Traveller organisations, HSE Public Health and the Local Authorities. It also made provision for self-isolating facilities, which included funding being made available to all Local Authorities to provide additional trailers (isolation units) where necessary. This mechanism and resulting works in partnership with Local Authorities and the local Traveller Health Units brought about many positive changes, however, recent data continues to show that overcrowding and homelessness is an increasing issue of concern, despite these interventions. Any further public health crises will continue to affect Travellers disproportionately where mitigating factors such as suitable accommodation remains to be an issue of concern.

Living on isolated sites, beyond walking distance from services, it may be impossible to travel to health appointments during the day. This is also true for education and employment opportunities. For those families without an authorised place to stay, finding a stopping place with sanitation and water may often prove more of a priority than dealing with preventative medical issues. Enforced mobility, through evictions or lack of available stopping places, greatly reduces opportunities to attend appointments, follow up previous care and access a range of preventative health care. Health impact assessments must be introduced into the design of Traveller accommodation, to ensure, at minimum, families can live in an environment that will promote their general health and wellbeing. Walkability and transport need to be considered when designing Traveller Accommodation.

For Travellers living on halting sites, in trailers and those living in energy inefficient homes group housing schemes, energy poverty is an issue and brings associated health problems. Census 2022 found the proportion of Irish Travellers living in private households who were living in trailers (caravans, mobile homes, or other temporary accommodation) was 8% in 2022. The annual count of Traveller families undertaken by Local Authorities for the Department of Housing Local Government and Heritage, would indicate a much higher figure (closer to the AITHS figure). It indicates 12% of families living on halting sites and another 7.6% living on unauthorised sites (trailers not on publicly approved sites or on private land).

This is significant, because we know the trailers (mobile homes/caravans) lived in by Travellers are not of a residential standard, are generally 15 years or older, have poor insulation and ventilation,

with 77% of Travellers living in mobile homes/caravans in energy poverty⁹. While Traveller specific accommodation is built in line with standard national building regulations, including group housing schemes and halting site. There is no requirement that trailers/mobile homes lived in by Travellers are of residential standard. We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.

*'Cold indoor temperatures place thermal stress on the body and can affect the immune circulatory and cardiovascular systems. Cold homes generate mould damp and dust mites which can affect respiratory and allergic conditions. Energy Poverty adversely impacts people's ability to access essential services and it limits their socialising internet access healthy food options attendance at education facilities and work. Children who are at risk of fuel poverty have been identified as a particularly vulnerable group for longer term health implications.'*¹⁰.

We know that climate change disproportionately affects disadvantaged groups not least Irish Travellers. Traveller Accommodation Programmes therefore must ensure that climate change considerations are comprehensively factored into the planning process for Traveller specific accommodation. Environmental concerns as they relate to the maintenance of positive mental and physical health should also be included in the planning process. Therefore, developments in terms of the location and layout of sites and the construction of individual accommodation units should be inclusive should be considered. It is important that Traveller Accommodation Programmes feature environmental and energy assessments the findings of which are incorporated into TAPs. As part of this process, plans should prioritize Traveller specific accommodation for climate mitigation and energy efficiency measures to ensure that accommodation is of good quality and can withstand the negative consequences of climate change. Traveller accommodation should be prioritised for energy efficiency measures.

Recommendations:

- A framework for improving environmental health in Traveller accommodation should be developed and incorporated into the TAP.
- Learning and mechanisms used to support the provision Traveller accommodation provision throughout COVID-19 should be utilised and mainstreamed into TAP processes.
- Walkability, safety, and transport need to be built into design of Traveller accommodation.
- We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.
- Environmental and Climate Change considerations to be factored into the planning of Traveller Accommodation.
- Traveller Accommodation should be prioritised for energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty

⁹ https://www.citizensinformationboard.ie/downloads/social_policy/MAB5_Energy_Poverty_Report_2019.pdf

¹⁰ <https://www.lenus.ie/bitstream/handle/10147/634784/Rapid%20report%20on%20energy%20poverty%20ADPHLG%2019%20Oct%202022.pdf?sequence=1&isAllowed=y#:~:text=Cold%20homes%20generate%20mould%2C%20damp,at%20education%20facilities%20and%20work.>

5. The Needs of Traveller Children

The national policy framework for children & young people 2014 – 2020 was titled Better Outcomes, Brighter Future. According to this policy, the five national outcomes we want for all our children and young people are that they:

1. Are active and healthy, with positive physical and mental wellbeing.
2. Are achieving their full potential in all areas of learning and development.
3. Are safe and protected from harm.
4. Have economic security and opportunity.
5. Are connected, respected, and contributing to their world.

When considering Traveller Accommodation Plans, it is important to bear these aims in mind and plan housing and accommodation that helps Traveller Children to also reach these goals.

Traveller families are larger than those in the general population, yet Travellers have fewer rooms in their homes than their settled counterparts (AITHS & Census 2022) which results in Traveller children often living in overcrowded conditions. Despite having bigger families, the AITHS documented that 77.5% of Traveller children had no safe play areas on their sites or group housing schemes. Absence of play facilities often posed a risk to Traveller children's safety. Action 61 in the National Traveller and Roma Inclusion Strategy (NTRIS) obliges Local Authorities, to ensure the need for access to safe, appropriate play areas when designing Traveller specific accommodation. Further, a risk of equal concern is the proximity of many Traveller sites to dual carriageways and the absence of pedestrian lighting; lack of public footpaths or lighting placing young Travellers in danger when walking to school, shops, or recreation facilities.

Living in poor quality accommodation and overcrowding can result in health difficulties for children. Research has shown that overcrowding can lead to an increase in infectious disease among children particularly gastro-enteritis, skin disorders and chest infections. There is also evidence that children's development can be hindered by living in cramped conditions and poor accommodation. It can also result in poor physical health including an increase in the incidence of asthma among children. The AITHS documented a child asthma rate of 70% in Traveller children reporting a current health problem. It also reported a higher prevalence of hearing, eyesight and speech problems among Traveller children compared to the general population-this is in keeping with international evidence.

Access to early childhood education for Traveller children needs to be encouraged, and considered when locations of Traveller accommodation are being planned. Poor uptake rates of early childhood education results in children being behind their peers from the beginning of schooling, and this gap is difficult to bridge. Access to Primary and Secondary schools also need to be factored in.

The UN Convention on the Rights of the Child protects the cultural rights of children belonging to indigenous and minority groups, including Traveller children. The lack of provision of Traveller specific accommodation and the implementation of the Miscellaneous Provisions Act undermines the rights of Traveller children in exercising their culture and having the opportunity to continue some of their traditions including the right to be nomadic. Dispersing Traveller families throughout Local Authority areas and isolating Traveller children in private rented houses and apartments is undermining of Traveller culture and having negative health impacts manifested in mental health problems, substance misuse and breakdown of families. Poor accommodation is also affecting Traveller children's participation in and outcomes from the education system.

IRISH COALITION TO END YOUTH HOMELESSNESS

The Irish Coalition to End Youth Homelessness, established in September 2017, consolidates the work of different organisations who work in the areas of youth, housing and homelessness,¹³ and is a member of the Steering Group established by the Department of Housing, Local Government and Heritage to oversee the implementation National Youth Homelessness Strategy 2023-25.

The Housing (Traveller Accommodation) Act 1998 Act provides for public input to, and consultation on the preparation and implementation of Traveller Accommodation Programmes.

The Irish Coalition to End Youth Homelessness calls on each Local Authority in the preparation of Traveller Accommodation programmes to ensure recognition of youth homelessness, in line with national policy under Housing for All, and the National Youth Homelessness Strategy 2023-25. The Youth Homelessness Strategy identifies young members of the Traveller community as a cohort of heightened vulnerability to youth homelessness.

In relation to Traveller Accommodation Programmes, the Youth Homelessness Strategy requires each Local Authority to include specific actions in future Traveller Accommodation Programmes to address youth homelessness.¹⁴

Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029

The Coalition also highlights the below related actions under the Youth Homelessness Strategy for which Local Authorities are named owners/ co-owners.

- Develop and implement homelessness prevention programmes for young people.¹⁵
- Enhance connectivity between local authorities and Tusla, to ensure that appropriate supports can be provided.¹⁶
- Work with the LTACCs to consider and put in place any additional supports that are required at a local level to assist young Travellers who are at risk of experiencing homelessness.¹⁷
- Ensure the specific inclusion of young people in Regional Homelessness Action Plans, with consideration given to those who have been identified in the Strategy as vulnerable cohorts.¹⁸
- Establish Youth Tenancy Support Programmes.¹⁹

Ensuring the connection between national, regional and local policies in relation to housing and homelessness, these actions should be considered by each Local Authority in the preparation of Traveller Accommodation Programmes to ensure comprehensive determination of need, and provision of appropriate support to meet this need.

¹³ The Coalition comprises of; Barnardos, Belong To, Clúid Housing, Cope Galway, Crosscare, Depaul, EPIC, Focus Ireland, Foróige, Irish Traveller Movement, National Youth Council of Ireland, Novas, Peter McVerry Trust, Simon Communities, Society of Saint Vincent de Paul, Spunout, Teen Parent Support Programme, Threshold, Union of Students in Ireland.

¹⁴ National Youth Homelessness Strategy Action 21: Include specific actions in future Traveller Accommodation Programmes (TAPs), to address youth homelessness.

¹⁵ Action 2.

¹⁶ Action 4.

¹⁷ Action 8.

¹⁸ Action 15.

¹⁹ Action 23.