



Kildare County Council
Comhairle Contae Chill Dara

DRAFT

Traveller

Accommodation

Programme

2025-2029



Prepared August 2024

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Introduction

The Housing (Traveller Accommodation) Act, 1998 requires Kildare County Council to prepare and adopt a 5-year Traveller Accommodation Programme to meet the existing and projected accommodation needs of members of the Travelling Community who are eligible for social housing support within the Council's administrative area.

Directions for the preparation of a new Programme were issued on the 18th of December 2023, by the Minister for Housing of State for Planning and Local Government together with the Guidelines on the Preparation and Implementation of Local Authority Traveller Accommodation Programmes 2025-2029.

In accordance with Section 10 of the 1998 Act, the Minister has directed that the next Traveller Accommodation Programme will cover the period from 1 January 2025 to 31 December 2029.

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



Public Sector Duty

There is a requirement on public bodies to promote equality, protect human rights and prevent discrimination in accordance with the Irish Human Rights and Equality Commission Act, 2014.

The Council is committed to addressing equality and human rights concerns for all in the delivery of housing, including Traveller accommodation, by the promotion of the values of dignity, inclusion, social justice, democracy, and autonomy.

The Council will endeavour to develop a human rights focus into the work of the Traveller Accommodation Programme, in accordance with our Public Sector Duty as set out in Section 42(1) of the Act.

The Council is committed to eliminating discrimination, achieving equality, and fulfilling human rights for all service users and in doing so recognises the diversity of people across the identified groups for the Duty. Membership of the Traveller Community is covered by 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 Traveller specific accommodation and have a relevance for the functions of the housing authority.

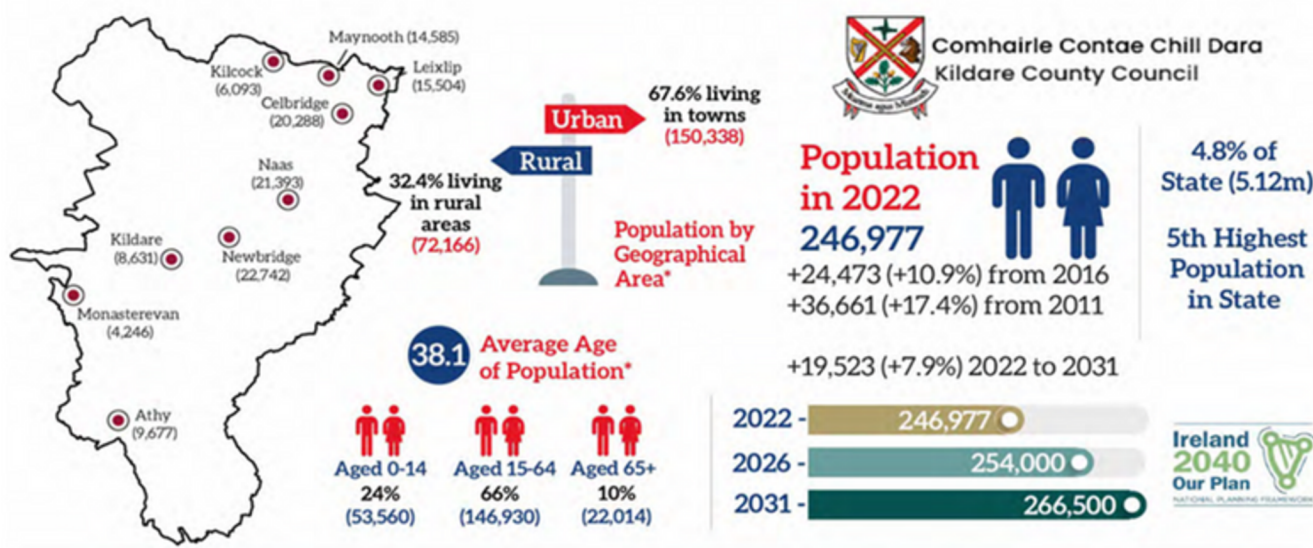
Address: identify and implement actions in place or proposed to be put in place by the Council to address the equality and human rights issues as assessed, as part of its strategic planning cycle.

Report: report annually on progress made in implementing the Duty and addressing the equality and human rights issues.

County Profile

Kildare is an inland county covering an area of 169,550 hectares. It occupies a strategic position within the Eastern Region of the Eastern and Midland Regional Assembly and forms part of the Greater Dublin Area (GDA).

The county is both a significant population base and has a significant residential base within the State with the eighth largest household stock nationally. The population recorded in the 2022 Census for the county was 246,977.



The number of Irish Travellers counted in the national Census 2022 was 32,949, which represented an increase of 6% from 2016 census figure of 30,987.

There were 929 Travellers in Kildare in Census 2022, compared with 739 in 2016 (+26%). This included 458 females and 471 males.

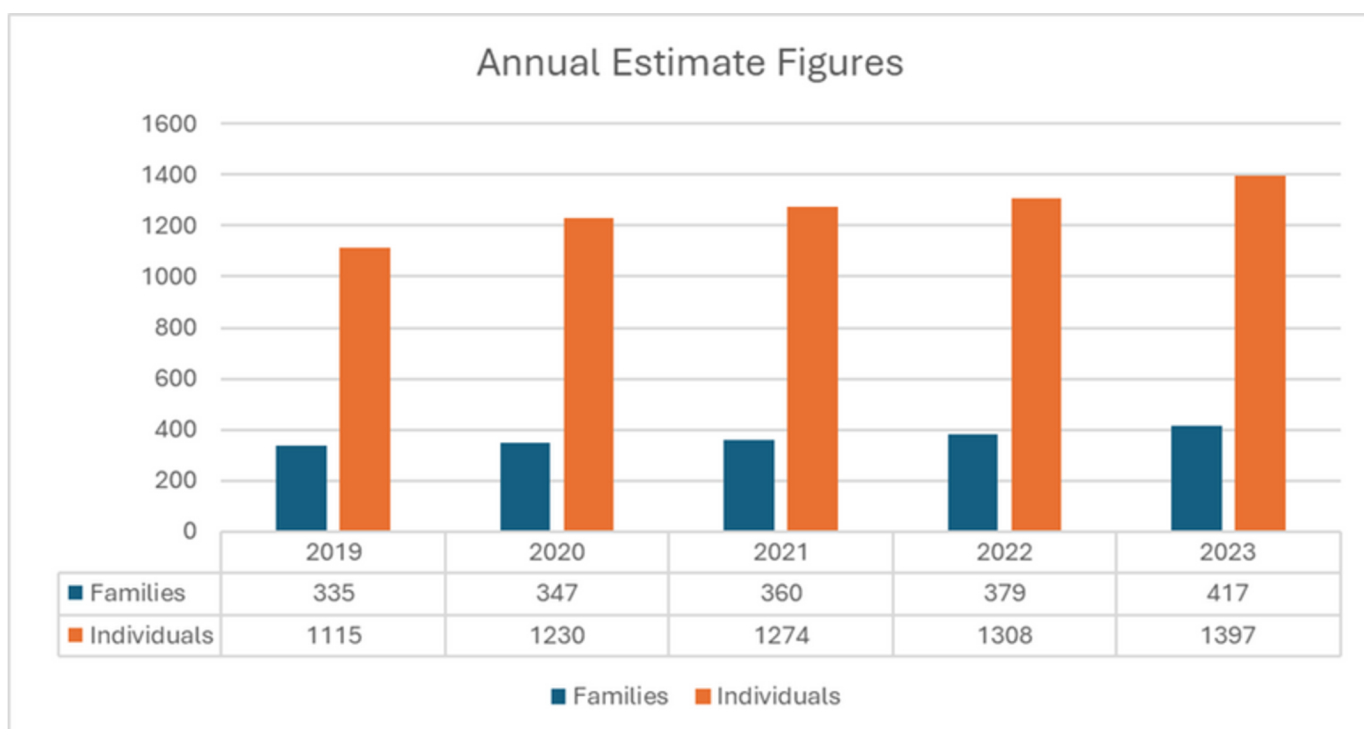
The 10% increase in the number of Traveller families in the annual estimate for Kildare exceeds the national increase.

Annual Estimate 2023

The most recent Annual Estimate of Accommodation of Travellers was conducted in November 2023 and recorded 417 Traveller families residing in County Kildare.

These families are accommodated in a range of accommodation types from Traveller specific group housing or halting sites to a range of social housing options and private owned and rented accommodation.

Comparison of Annual Estimate of Traveller families in County Kildare



These figures illustrate that in the context of the increasing numbers of Traveller families living in County Kildare, the Traveller population is a young population with increasing numbers of new and growing families.

There was an increase of 10% in the number of estimated numbers of Traveller families in Co. Kildare in 2023 compared with 2022.

Review of the Traveller Accommodation Programme 2019–2024

The last Traveller Accommodation Programme 2019– 2024 (TAP) was adopted by the members of Kildare County Council on the 23 September 2019. A Mid Term Review was completed in September 2022.

The Traveller Accommodation Programme 2025 – 2029 should be read as a continuation of the previous Traveller Accommodation Programmes.

Existing Traveller Specific Accommodation

The current position in relation to Traveller specific accommodation provided by Kildare County Council for Traveller families is as follows;

Location	Number of Units
Andrew Halting Site, Athy	6
Andrew Meadows Group Housing, Athy	6
Blacklion Halting Site, Maynooth	3
Blacklion Group Housing, Maynooth	8
Tankardsgarden Halting Site, Newbridge	2
Single Instance Properties	7
Total	32

Traveller Accommodation Programme 2019 – 2024



The Traveller Accommodation Programme 2019-2024 projected that the 73 accommodation units were needed to meet existing and projected accommodation needs including provision for new family formation and migration.

This was revised upwards to 89 units as part of the Mid Term Review, noting that the additional units would be delivered through the existing social housing delivery programme for 2023 and 2024.

A quarterly progress update on the Council's plan is presented to each meeting of the the Local Traveller Accommodation Consultative Committee.

The table below compares the targets for the TAP with actual delivery to date:

	Target in TAP 2019 – 2024	Mid-Term Review: Additional Need	Target Delivery	Actual Delivery	% Delivery
Standard Housing	58	16	74	83	112%
Traveller Specific*	15	0	15	12	80%
Total	73	16	89	95	106%

**Includes 5 single instance special purchase*

Breakdown of Housing Allocations 2019 – 2024

SOCIAL HOUSING

	2019	2020	2021	2022	2023	2024	Total
Standard Social-KCC	6	10	10	6	6	8	42
AHB* Social	4	6	7	6	12	2	36
Total	10	16	17	12	18	10	83

**AHB = Approved Housing Body*

TRAVELLER SPECIFIC

	2019	2020	2021	2022	2023	2024	Total
Group Housing	0	2	1	0	0	0	3
Halting Site	1	2	0	0	1	0	4
Special Purchase	1	1	0	1	1	1	5
Total	2	5	1	1	2	1	12

**Allocations up to July 2024*



The projected need for Traveller specific housing was for 15 units.

Twelve allocations were made in the period of the TAP 2019-2024. These allocations were comprised of 5 casual vacancies within current stock, 2 new units at the Tankardsgarden Halting site and 5 single instance/ special purchase properties. Casual vacancies arising within Traveller specific accommodation have an important role in meeting the targets.

The Council delivered 80% of the projected target for Traveller Specific allocations.

The projected need for social housing in the TAP 2019-2024 was for the provision of 58 standard social housing allocations to Travellers. This target was amended and increased by an additional 16 allocations following the Mid-Term Review.

The revised target for standard social housing allocations to Travellers was 74 units. A total of 83 standard social housing allocations have been delivered (to date), representing a delivery of 112% in this category.

Overall, the Council achieved a performance of 106% on the housing targets of the TAP 2019-2024.

Traveller Specific Accommodation

The Council has progressed the following schemes during the current plan:

- **Tankardsgarden, Newbridge**

A redevelopment project at the Tankardsgarden site was included in the Programme. However, this was discontinued in 2020 due to a change in the housing needs of the families on site and technical constraints associated with the erosion of land along the banks of the River Liffey, which runs alongside the site.

The site was subsequently renovated and upgraded in late 2021 to accommodate a new extended family group. Two halting site bays have now been provided on the site.

- **Andrew Redevelopment, Athy**

A redevelopment of the existing halting site (6 bays) to 5 group housing units and 3 enlarged bays has been approved by the Department of Housing, Local Government & Heritage (July 2024).

The Council expects to complete the Part 8 planning process by year end (Q4 2024), with a view to progressing this project to tender and commence construction by Q2 2025.



Proposed redevelopment of Andrew Halting Site, Athy

Traveller Specific Accommodation

- **Kildare Town – Group Housing**

As part of the Coolaghknock Glebe social housing development in Kildare town, 4 group housing units are included.

This project is currently at planning stage (Q3 2024) and expected to progress to tender and construction in Q3/ Q4 2025.



Proposed Group Housing at Coolaghknock Glebe

- **Blacklion, Maynooth – Halting Site**

A site feasibility report is being prepared to provide two additional halting site bays on this site (Q3 2024).

- **New and Refurbished Accommodation**

During the period of the TAP, the Council spent a combined total c. €3.25m on capital expenditure in respect of refurbishments and upgrade works on Traveller specific schemes, caravan loan scheme and single instance acquisitions.

The programme was significantly funded by the Department of Housing, Local Government & Heritage (Traveller Accommodation Programme).

- **Single Instance Units**

During lifetime of the 2019– 2024 Programme, five single instance housing units were acquired by the Council and provided to meet individual family needs/requirements, including medical priority. These purchases were delivered on a case-by-case basis.

Location	Units
Newbridge	1
Athy	2
Straffan	1
Leixlip	1
Location	5

Traveller Specific Accommodation

- **Mobile Home Replacement – Kildare and National Schemes**

The Council provides support to tenants living on council halting sites to access support for a mobile home purchase /upgrade based on exceptional need or hardship. A total of 7 families were supported from 2019 to 2023 under this Council scheme.

A National Pilot Caravan Loan Scheme was launched in 2022. To date, 5 additional purchases were facilitated through this scheme. This scheme is reviewed annually and is expected to continue in future years.

- **Energy Efficiency Retrofit Programme (EERP)**

Energy poverty is widely experienced within the Traveller Community. Under the EERP, the Council in 2023 afforded the opportunity for a retrofit upgrade to eight group housing tenants in the Blacklion estate, Maynooth. All 8 accepted to upgrade their homes and works were completed in Q2 2024.

The upgrade works were undertaken in early 2024 - works included the installation of air to water heat pumps, blocking up fireplaces and filling/capping chimneys. Window and door upgrades were previously undertaken at the properties.

Attic and cavity wall insulation (where required) were also installed to bring the properties up to a BER B2 rating or cost optimal. A total of c. €250,000 was spent on the scheme.



Traveller Pride Event in Athy Traveller Centre (2024)



Traveller Accommodation Programme 2025 – 2029

Local authorities are required under the Housing (Traveller Accommodation) Act 1998 to assess the accommodation needs of Travellers for the programme period.

Notice of this assessment was communicated to relevant statutory bodies, including members of the Housing and Regeneration Strategic Policy Committee, the Local Traveller Accommodation Consultative Committee (LTACC), Kildare Traveller Action and the Health Service Executive (HSE).

In March/ April 2024, a survey of Traveller households residing in the county was conducted to assess both current and projected future accommodation needs over the programme's lifespan. The assessment encompassed a range of accommodation options, including standard and Traveller specific housing.

This evaluation ensures that the Traveller Accommodation Programme reflects the accommodation needs and preferences as identified through the consultation process.

Basis and Methodology of Assessment of Need

Section 6 (as amended) of the Housing (Traveller Accommodation) Act 1998 requires housing authorities, for the purposes of preparing a programme in respect of their functional area, to assess the accommodation needs of Travellers who are assessed under Section 20 of the Housing (Miscellaneous Provisions) Act 2009 as being qualified for social housing support, including the need for sites.

To ensure a thorough assessment of need was completed, Kildare County Council Social Work Team based their Assessment of Need process on the following:

- Annual Estimate of Accommodation of Travellers – November 2023
- Housing Needs Assessment 2023 – Updated data held on the Council's housing data system.
- Letters were issued to all Traveller households with a housing need currently requiring accommodation to advise them of the preparation of the Traveller Accommodation Programme 2025-2029 and to invite their participation in survey by phone.

Basis and Methodology of Assessment of Need

- Families were given the opportunity to meet with a social worker on a one-to-one basis to complete a survey and express their accommodation preference.
- Consultation and collaboration with Kildare Traveller Action to ensure a complete picture of need was captured.
- The members of the LTACC also aided with the completion and return of surveys to ensure families had fully expressed their accommodation preferences.
- The Housing Assessment of Need (Travellers) in the county is also assessed and monitored on a continuous basis by the local authority Social Workers through their work and knowledge of the family groups.

It was estimated that there are 417 Traveller households in the County, following the Annual Estimate of Traveller families carried out in November 2023. The participants are resident in the county in various forms of accommodation including standard housing, group housing, halting sites, roadside locations, private rented and homeless/ emergency accommodation. Of this 417, a total of 248 households are social housing tenants.

The assessment for the preparation of the TAP in March/ April 2024 showed that there are a total of 36 families in Traveller specific halting site and group housing accommodation in the county. Of these families, 23 families are tenants with a further 13 families sharing. There were 11 households are living on the roadside at the time of the assessment. Furthermore, the assessment identified that 30 individuals who will reach the age of 18 years of age on or before the end of 2029.

Persons identified as having a future housing need are categorised as 'future family formation' (FFF). A provision of 50% (or 16 households) will be included for allocation in this plan. This reflects that not all applicants would qualify for a housing allocation within the period of the new programme.

There are 6 families with specific medical and disability housing requirements which will be met in the lifetime of this programme.

Assessment of Need 2025–2029

Current and Future Family Formation

This assessment suggests a need for an additional 104 accommodation units to meet current and future housing needs of Traveller families in the county.

The Council is focused on providing homes for households currently residing in homeless accommodation and shared accommodation.

In addition, the Council continues to support Traveller families in roadside caravans with the aim to support these households to source suitable standard or Traveller specific accommodation.



Traveller Pride 2023 at Newbridge Family Resource Centre

Households not included in the Housing Needs Assessment carried out in March/ April 2024 but who are eligible for social housing support may make an application for social housing support (including Traveller specific housing) and their application will be assessed in accordance with the Social Housing Assessment Regulations.

Standard Social Housing

Target by Municipal District area over the lifetime of the programme

	Athy MD	Celbridge/ Leixlip MD	Clane/ Maynooth MD	Kildare/ Newbridge MD	Naas MD	Total
Standard	17	16	13	21	8	75

Assessment of Need 2025–2029

Current and Future Family Formation

Traveller Specific

Target by Municipal District area over the lifetime of the programme

	Athy MD	Celbridge/Leixlip MD	Clane/ Maynooth MD	Kildare/ Newbridge MD	Naas MD	Total
Group Housing	9	4	0	6	3	22
Halting Site	4	0	2	0	0	6
Single Instance/ Rural	0	0	1	0	0	1
Total	13	4	3	6	3	29



Traveller Pride 2023 at Newbridge Family Resource Centre

Assessment of Need 2025–2029

Current and Future Family Formation

Standard Social Housing – including Approved Housing Bodies

Annual delivery target across all MD areas

Year	2025	2026	2027	2028	2029	Total
Units	15	15	15	15	15	75

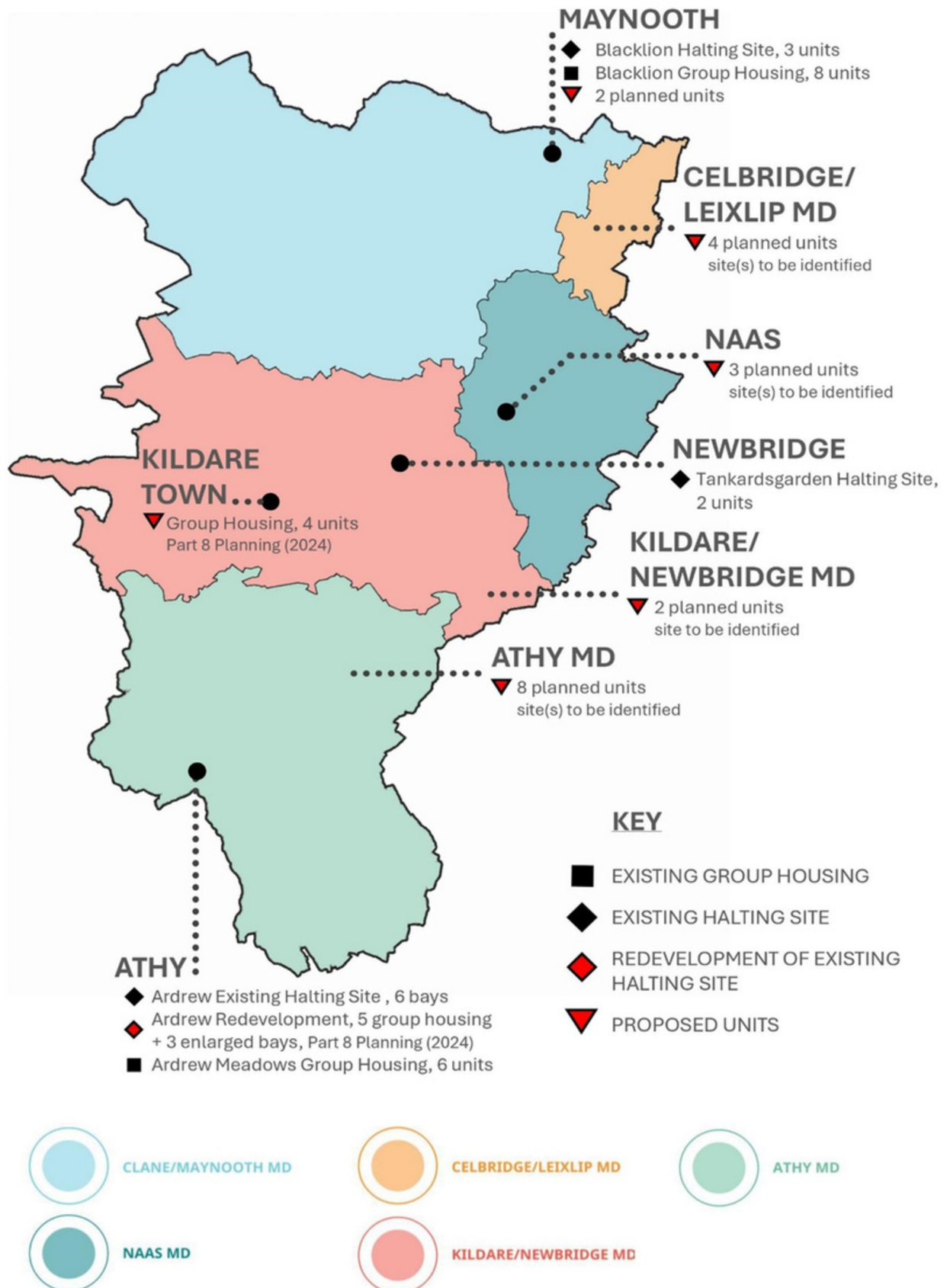
Traveller Specific

Annual delivery target across all MD areas

	Athy MD	Celbridge/ Leixlip MD	Clane/ Maynooth MD	Kildare/ Newbridge MD	Naas MD	Total
Delivery	2026 - 5 2029 - 9	2029	2025	2026 - 4 2027 - 2	2028	
Number of Units	13	4	3*	6	3	29

*Includes single instance acquisition

Existing and Proposed locations





Strategy and Implementation

Kildare County Council is the implementing authority for the Traveller Accommodation Programme 2025 – 2029.

It is the objective of the Council to provide accommodation for Travellers that forms part of the assessment processed detailed earlier, within the lifetime of the Programme.

Projected Targets and Implementation

The delivery of standard housing will be achieved through the Council's current Housing Delivery Action Plan 2022- 2026 (and future Plan).

The Plan includes delivery through Approved Housing Bodies (AHBs).

Traveller specific housing units will be delivered through development on new and existing sites in the county. Details provided previously.

The LTACC and Council will be updated as developments are being progressed.

Standard Local Authority Housing

The Council has identified the need to provide accommodation for 75 Traveller households in standard local authority housing (including Approved Housing Bodies – AHBs) housing within the period of this TAP.

Travellers will be offered housing in accordance with the Council's 'Allocation Scheme for the Provision of Social Housing Support'. This scheme outlines the criteria and order in which housing is allocated to applicants.

Staff are available to assist individuals with completing their housing applications. This support aims to ensure that applicants have the necessary help and guidance to successfully navigate the application process and support those with digital literacy issues. This approach aims to provide appropriate housing options for Travellers while promoting sustainable communities and ensuring tenants are well-prepared for their new homes.

Traveller Specific Accommodation

NEW BUILD

All new permanent Traveller specific accommodation will be designed in accordance with the DHLGH guidelines. The Council is also committed to exploring opportunities with Approved Housing Bodies including CENA, a Traveller-led AHB.

Designs for new sites will be submitted to the relevant Municipal District Committee for review as part of planning process. The preferences of Travellers for grouped housing over halting sites will be considered.

The implementation of the TAP, as outlined below, is contingent upon the identification of suitable sites, securing funding from DHLGH and obtaining necessary planning approvals. The following is a list of indicative locations for Traveller accommodation, with sites to be selected based on need:

- Kildare Town
- Naas town
- Celbridge Leixlip MD
- Athy MD



Traveller Pride Event at Royston Club, Newbridge (2024)

Traveller Specific Accommodation

Construction and Refurbishment Programme

EXISTING SITES

To address the accommodation needs of the Travellers, the Council propose a construction and refurbishment programme on two existing Traveller accommodation sites in consultation with the residents at:

1. Ardrew, Athy - Planning Part 8 (2024)
2. Blacklion, Maynooth - Feasibility Assessment (2024)
3. Countywide - Various - Energy Retrofit Programme (Ongoing)

The redevelopment of these sites is contingent upon funding from the DHLGH and the necessary planning approval.

The construction and refurbishment programme aims to resolve quality, design and provision challenges at existing sites.

The Council will actively engage with the LTACC, Kildare Traveller Action and the Traveller community and their representatives. This collaboration ensures that the the opinions and experiences of the Traveller community are central to the decision-making process.

The Council is committed to extending pilot Energy Retrofit Programme to provide more energy efficient housing options to Travellers in both our newly constructed homes and existing housing stock over the lifetime of the next TAP 2025-2029.



Traveller Specific Accommodation

Construction and Refurbishment Programme

FUTURE SITES

Feasibility studies will also be undertaken at the following locations (sites to be identified) to examine the potential for the construction of new Traveller specific housing schemes within the following Municipal District areas:

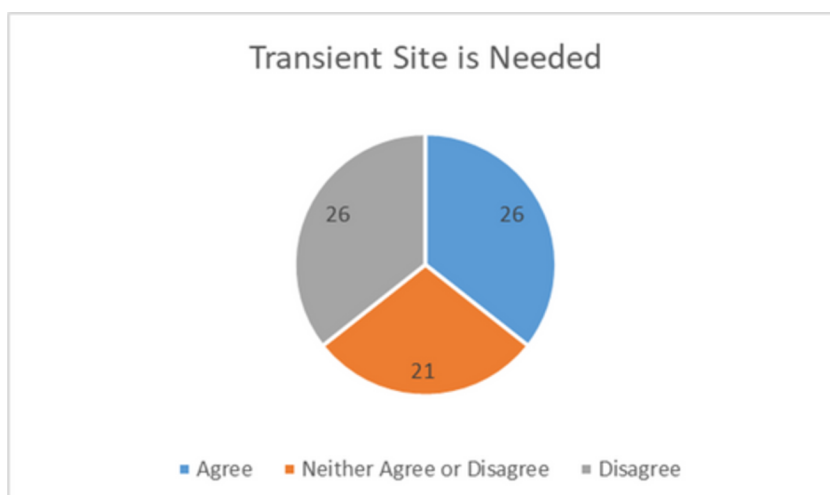
- Celbridge/ Leixlip
- Kildare/ Newbridge
- Athy
- Naas

TRANSIENT SITES

While it is recognised that there is a requirement to provide a national network of transient sites for Travellers in the context of recognising nomadism as a feature of Traveller culture, this should be considered on a regional basis in conjunction with other local authorities.

In the overall context, priority for accommodation will be given to those Travellers who have been identified as needing permanent accommodation in the assessment undertaken for the preparation of this Programme.

As part of the consultation for the new Programme, the Council asked respondents for their feedback on the development of transient sites within Kildare. The survey found that a lack of a particular preference for this type of site. Of those respondents who did not support transient sites, the general view expressed were reservations relating to families that they did not know coming into the area.





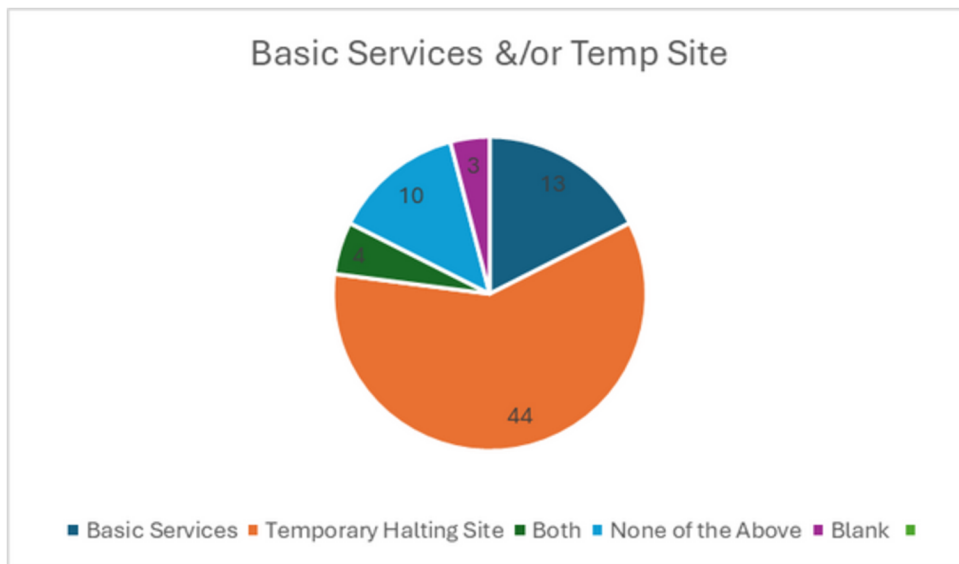
Traveller Specific Accommodation

Temporary Sites and Provision of Basic Services

As part of the consultation, the Council also asked respondents for their feedback on the development of temporary sites and the provision of basic services.

The feedback indicates that there was support for the development of temporary sites that could be used by families who are otherwise living on the roadside and are awaiting an offer of permanent accommodation.

The Traveller Accommodation Unit can undertake an assessment of need for families who are on the roadside and without access to basic facilities. Emergency accommodation can be offered in such instances.



Within County Kildare, there are currently no such temporary facilities for Traveller households.

Homelessness

As part of the Council's Homelessness Action Plan 2024 – 2026 (Mid East Region), specific key actions are included to support individuals and households experiencing homelessness or at risk of homelessness.

The Council recognises the vulnerability of Travellers who are experiencing homelessness and proactively assists these individuals and families.

In accordance with the Council's 'Allocation Scheme for Provision of Social Housing Support' priority is awarded to homeless persons alongside other specific categories of individuals in need of housing. Individuals and families awaiting an offer of permanent accommodation can avail of a range of supports from the Housing Department, including the Homeless Team.

The Team provides comprehensive outreach assistance as well as detailing emergency accommodation options, including accommodation placement, Homeless HAP Placefinder (Housing Assistance Payment), family hubs and other supported accommodation.

As part of the national Youth Homeless Strategy 2023- 2025, the Council is committed to work with the LTACC to consider and put in place any additional supports that are required at a local level to assist young Travellers who are in these categories. In this regard, the Council will explore specific needs in the county.



Mobile Home/ Caravan Loan Schemes

It is acknowledged that Travellers can face difficulty in accessing finance to purchase caravans/mobile homes. In response, the Council has operated a mobile home loan scheme since 2017.

Nationally, the DHLGH launched a national pilot scheme in 2022. The DHLGH has commenced a comprehensive evaluation of their pilot caravan loan scheme.

This evaluation, based on data collected from local authorities and other stakeholders, aims to explore options for the introduction of a permanent scheme.

The Council remains committed to facilitating access to suitable accommodation for Travellers through this financial support scheme.

Age-Friendly Accommodation

The Council proposes the development of specialised housing units designed to meet the specific needs of older members of the Traveller community.

Recognising the increasing age profile within this population, the Council aims to provide accommodation that supports the health, well-being, and independence of older tenants.

By creating age-friendly units, we can optimize the utilisation of existing housing stock through vacancy rates and reallocate larger units to families on the Traveller specific waiting list.

This strategy aligns with the Council's broader commitment to providing accessible and inclusive housing options for all residents.

Universal Access

The Council is committed to delivering housing that adheres to universal access principles.

This ensures that all residents, regardless of age, disability, or other factors, can live independently and with dignity.

By incorporating accessibility features into our housing developments, we create inclusive environments that enhance the quality of life for all community members.

Unauthorised Sites

The law regarding unauthorised sites is outlined in legislation as below:

- Roads Act 1993
- Housing (Traveller Accommodation) Act 1998
- Housing (Miscellaneous Provisions) Act 1992
- Local Government (Sanitary Services) Act 1948
- Housing (Miscellaneous Provisions) Act 2002

The Council will continue to use these powers where appropriate. In addition, in areas where Court injunctions are in place the Council will seek the enforcement of these orders.



Management and Maintenance of Developments

Traveller Accommodation Unit

Kildare County Council is committed to the delivery of high-quality accommodation and services and to this end, the Council established the Traveller Accommodation Unit within the Housing Department in 2018.

The unit consists of administrative, social work and warden staff. In addition, there is support from relevant personnel across the housing section including the Homeless Service, Tenant Liaison Service, Tenancy Sustainability Service, Maintenance, Assessments, Allocations and Rent Review teams. This team ensures that Traveller families will continue to receive a range of on and off-site services.

Estate Management

The Council is committed to supporting residents on Traveller accommodation sites to become involved in tenant participation and engagement in their estates. The Council's housing and community departments and Kildare Traveller Action are key this achieving this goal.

Funding from the national Dormant Accounts Fund over recent years has been beneficial in enhancing the physical environment at these developments and supporting tenant engagement.

The requirements of the Council's 'Anti Social Behaviour Strategy' (2024) apply to all the Council's social housing units, including Traveller specific accommodation.

Fire Safety

The Council provides updates on fire safety at Traveller specific developments at quarterly meetings of the LTACC. The ongoing support and engagement of the County Kildare Fire Service and Kildare Traveller Action is acknowledged.

An annual report on fire safety activities and initiatives is provided to the LTACC and National Traveller Accommodation Consultative Committee.

Control of Horses

Kildare County Council does not include the provision of accommodation for horses in any Traveller accommodation proposals.

Horse owners are responsible for the provision of appropriate accommodation for their horses. The control of horses is managed by the Environment Section of Kildare County Council.



Community Fire Safety Awareness Event in Blacklion, Maynooth (2023)

Policy Statement

The Council will ensure that all Traveller specific accommodation is provided to the highest standards in consultation with Traveller advocacy groups and residents.

Accommodation is located close to essential services such as schools, public transport, medical services, shops and recreational facilities. This will be achieved through a combination of construction and refurbishment programmes including the development of new sites, redevelopment of existing sites, casual vacancies as they arise and standard social housing.

To implement this programme the Council will work with the Local Traveller Accommodation Consultative Committee, members of the Traveller community in need of housing, Kildare Traveller Action, adjoining local authorities and national organisations. The Council will continue to provide on-site services to Travellers, including maintenance of sites and will provide caretaker services at Traveller specific accommodation.

Eligibility for Traveller specific accommodation will be in accordance with the criteria eligible for social housing support within the Council's administrative area. Assistance with applications for housing will continue to be made available to Travellers wishing to avail of social housing supports.

Policy Statement

All proposals for permanent Traveller-specific accommodation will adhere to the Part 8 Planning Process, as stipulated in the Local Government (Planning and Development) Regulations 2001 (as amended) and the Planning and Development Acts 2000 (as amended) and Section 179A of the Planning and Development Acts 2000 (as amended).

Unauthorised encampments and illegal occupiers will be addressed in accordance with the relevant legislation/protocols.

Nothing in this programme shall prevent the Council from exercising the powers conferred under Section 2 (9) of the City and County Management (Amendment) Act 1955, (as amended by Section 27 of the Housing Act 1988 and Section 24 of Housing (Traveller Accommodation) Act 1998 in an emergency.

Transparency and accountability will be maintained by reporting progress to:

- KCC Senior Management Team
- Local Authority Accommodation Consultative Committee (LTACC)
- Housing & Regeneration Strategic Policy Committee
- Department of Housing, Local Government & Heritage (DHLGH).

The Council will employ a strategic approach to ensure timely delivery of newly constructed and refurbished Traveller-specific accommodation in the lifetime of this plan.

This includes regular monitoring and review of project targets and management and review to identify and mitigate potential risks. Securing necessary funding from the Department of Housing, Local Government and Heritage is crucial for the programme's success.

The goal is to enhance the quality and the availability of Traveller accommodation in the county through strategic planning, stakeholder engagement and effective resource management to deliver and quality housing and building positive culturally appropriate communities for the Traveller community in Kildare.



Kildare County Development Plan 2023 – 2029

The County Development Plan references the Traveller Accommodation Programme as setting out Council policy regarding the provision of Traveller specific accommodation. The Council will, as necessary, continue to update its accommodation programme for the Travelling community in accordance with the principles of proper planning and sustainable development.

The current County Development Plan contains the following six (6) objectives in relation to the Traveller community:

- HO O30 Support the delivery of the Kildare County Council Traveller Accommodation Programme 2019 – 2024 (and any superseding programmes agreed by the Council) in accordance with the principles of proper planning and sustainable development.
- HO O31 Implement the delivery targets, of the Kildare County Council Traveller Accommodation Programme 2019-2024 (and any superseding programmes agreed by the Council) and to meet the delivery targets as a minimum, including to identify and develop sites for Traveller specific housing and to provide accommodation appropriate to the identified needs of members of the Traveller community.
- HO O32 Ensure that Traveller accommodation is located in proximity to key services including education, community, health, recreation and public transport facilities, and to support those communities in accessing Council services in their widest provision (including arts and culture).
- HO O33 Support the implementation of the recommendations of the Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in Co. Kildare.
- HO O34 Recognise the separate identity, culture, tradition, and history of the Travelling people in order to reduce the levels of disadvantage that Travellers experience, consistent with UN Sustainable Development Goal No. 10 – ‘Reduced Inequalities’.
- HO P8 Ensure that groups with specialist housing needs, such as older persons, people with disabilities, the homeless, Travellers, those in need of emergency accommodation including those fleeing domestic violence, are accommodated in a way suitable to each of their specific needs.

Traveller Ethnic Identifier

The statutory Social Housing Support Application now includes a Traveller identifier for applicants and was introduced from March 2022, under Regulation S.I. 73 of 2022.

The Council is committed to working with the Traveller advocacy groups to improve digital access/customer services to Travellers to inform applicants of the option to self-identify in the social housing application form.

The objective is to improve the collection and analysis of data on ethnicity that is collated in our Integrated Housing System. This anonymised statistical information can be better used to ensure accurate, robust and comprehensive data to inform decision making in relation to the provision and spending on Traveller accommodation in the county.

Local Traveller Accommodation Consultative Committee (LTACC)

The LTACC is integral to the consultation process regarding Traveller accommodation. It ensures accountability and facilitates communication with the Traveller community. Among its roles and responsibilities, the LTACC is consulted on matters related to Traveller accommodation. It plays a key consultative role in the provision and management of Traveller accommodation.

Updates and progress reports on the TAP are provided to the Committee at quarterly meetings. The LTACC members are supported in their roles through specific training and update briefings on housing issues relative to the Traveller community.

The Council will support Kildare Traveller Action to increase Traveller participation and engagement in the LTACC.

It is proposed that a special subgroup will be established by the LTACC to review and address issues such as fire safety, control of horses and waste management at Traveller accommodation sites in the county. Updates on this work of the subgroup will be provided to the LTACC.

The LTACC are informed on all aspects of Traveller accommodation development, management, and related matters to ensure that issues are systematically addressed, with regular updates and consultations involving all relevant stakeholders.

The members of the LTACC are contained in **Appendix 1** to this document

Kildare Traveller Action

Kildare County Council continues to work with the Department of Housing, Local Government and Heritage and support the valuable work undertaken by Kildare Traveller Action.

The Council is committed to maintaining ongoing consultation and collaboration with Kildare Traveller Action in relation to delivering on the accommodation needs of the Traveller families living within the county.

The Council is supportive of the expansion of KTA services across the county, particularly in community development.

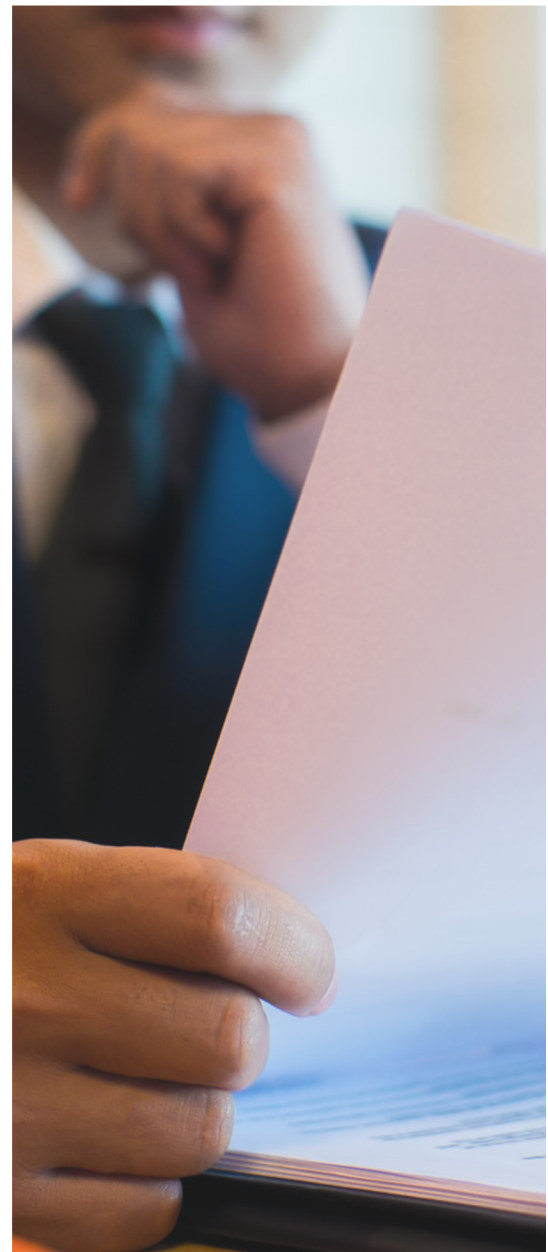
Review of the Traveller Accommodation Programme 2025 -2029

Annual targets will be reviewed on an ongoing basis to ensure that progress is being maintained. Regular reporting will be provided to the Council's Senior Management Team, LTACC, Housing & Regeneration Strategic Policy Committee and the Department of Housing, Planning and Local Government.

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 within 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 30th June 2027.



Consultation

The Housing (Traveller Accommodation) Act 1998 requires local authorities to undertake a consultation process as part of their preparation for the Traveller Accommodation Programme. Under Section 9 of the Housing (Traveller Accommodation) Act 1998, Kildare County Council is making available this Draft Traveller Accommodation Programme for public inspection and invite submissions.

Key stakeholders and public

For this review consultation was undertaken with the following key stakeholders and the public

- Local Traveller Accommodation Consultative Committee (LTACC)
- Kildare Traveller Action (KTA)
- Public consultation and newspaper advertisements
- Social media – Kildare County Council, Kildare Community Stories and via KTA/ Kildare PPN.
- Consultation with Traveller households, subject to eligibility.

Consultation with Traveller Households

- Consultation with Traveller households was conducted by survey.
- Surveys were invited via self- completion, phone survey or via office appointments. Surveys were conducted by KCC staff in Social Work and Traveller Accommodation Sections.
- Participation was supported through public advertisement and utilising information available from Social Housing Needs Assessments, Annual Traveller Estimate and local knowledge (Council's Housing Department, LTACC membership and Kildare Traveller Action).



Traveller Pride Event at Athy Traveller Centre (2024)

Public Consultation – Pre-Draft

As part of the preparation of this draft programme submissions were invited. Notification was also issued to neighbouring local authorities and advocacy groups.

Eight submissions were received as below:

- *Irish Traveller Movement – ITM, National Traveller Women’s Forum and Pavee Point Traveller & Roma Centre (Joint Submission)*
- *CENA Approved Housing Body*
- *Cluid Housing – Approved Housing Body*
- *Irish Coalition to End Youth Homelessness – Focus Ireland*
- *Councillor Seamie Moore*
- *Kildare Traveller Action – KTA*
- *Health Service Executive Community Healthcare (National Traveller Health Implementation Group)*
- *National Traveller Money Advice & Budgeting Service – MABS*

These were taken into consideration in the preparation of this draft programme (See **Appendix 2**).

Not all recommendations contained in the submissions relate directly to the provision of housing or Traveller specific housing, but rather link into a wider approach of inclusion and interagency collaboration.

Kildare County Council is committed to the development and implementation of the County Kildare Traveller and Roma Interagency Strategy at a local and national level.

Public Consultation

Draft Programme 2025 – 2029

The Council previously invited submissions for the Programme from interested parties to be made by Thursday, 28th March, 2024.

On foot of these submissions and following an assessment of existing and projected accommodation needs, this Draft Traveller Accommodation Programme has been prepared and is **available for public viewing from Thursday, 22nd August, 2024 to Thursday, 24th October, 2024.**

The draft can be accessed on the Council's website www.kildarecoco.ie Copies can also be requested by phoning Traveller Accommodation Unit, Housing Department at (045) 980991 and are available for viewing in the Council's Offices (Aras Chill Dara, Devoy Park, Naas, County Kildare).

Written comments and submissions in relation to the draft programme should be made in writing and returned in a sealed envelope marked 'Traveller Accommodation Programme 2025 – 2029' and addressed to Senior Executive Officer, Traveller Accommodation Unit, Housing Department, Kildare County Council, Aras Chill Dara, Devoy Park, Naas, County Kildare or online via the Council's Consultation Portal (Web link <https://consult.kildarecoco.ie/en>) **no later than 12 noon on Thursday, 24th October, 2024.**

APPENDICES

APPENDIX 1

Local Traveller Accommodation Consultative Committee Members 2024 – 2029

Elected Members

- Cllr. Anne Breen
- Cllr. Aoife Breslin
- Cllr. Darragh Fitzpatrick
- Cllr. Peggy O'Dwyer
- Cllr. Claire O'Rourke

Traveller Community Representatives

- Petra Daly, Kildare Traveller Action
- Nominations awaited.

Kildare County Council

- Annette Aspell, Director of Services, Housing & Regeneration
- Ollie Brady, Senior Executive Officer, Housing

Local Traveller Accommodation Consultative Committee Members 2019 – 2024

Elected Members

- Cllr. Peggy O'Dwyer (Chairperson)
- Cllr. Anne Breen
- Cllr. Aoife Breslin
- Cllr. Darragh Fitzpatrick
- Cllr. Nuala Killeen

Traveller Community Representatives

- Petra Daly – Kildare Traveller Action
- Ann O'Donnell
- Rose McInerney
- Kathleen Donoghue
- Elizabeth McDonagh
- Bridget Cawley

Kildare County Council

- Annette Aspell, Director of Services, Housing & Regeneration
- Ollie Brady, Senior Executive Officer, Housing

APPENDIX 2

Submissions received (March 2024)

1	Irish Traveller Movement – ITM, National Traveller Women’s Forum and Pavee Point Traveller & Roma Centre (Joint Submission)
2	CENA Approved Housing Body
3	Cluid Housing – Approved Housing Body
4	Irish Coalition to End Youth Homelessness – Focus Ireland
5	Councillor Seamie Moore
6	Kildare Traveller Action – KTA
7	Health Service Executive Community Healthcare (National Traveller Health Implementation Group)
8	National Traveller Money Advice & Budgeting Service – MABS

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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.

Submission 1

Irish Traveller Movement

ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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.*

Submission 1

Irish Traveller Movement

ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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 in to consideration the development of the future TAP Programme 2030-2034, with an awareness and understanding of future and projected need.*

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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, 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, 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 2024, 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, 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.

Submission 1

Irish Traveller Movement

ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

Land Development Agency Act 2016 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, 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 2019. 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.

Submission 1

Irish Traveller Movement

ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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.

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.

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 central Traveller Strategy with specific intersectional priorities based on disability, children, at risk of homelessness, single parenting and domestic violence.

Submission 1

Irish Traveller Movement

ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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%).

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'.

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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 2014²¹ 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 Public Sector 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.

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

Traveller Accommodation Expert Review July 2019

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.

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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.

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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?

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

Proposed Checklist for development of Traveller Accommodation Programmes 2025 - 2029

<p>Future and Projected Need</p>	<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?
<p>Recognition of Culture</p>	<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
<p>Homelessness</p>	<ul style="list-style-type: none"> • Are figures provided on numbers of Travellers / families in homeless accommodation?
<p>Budget and Planning</p>	<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) inline with the recommendations of the OPR report, in both the TAP and the Development Plan? • Have transient sites been assessed and planned for?

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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 2025-2029

- *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.*

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

Appendices

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.*

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Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

Appendices

Appendix B

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

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.

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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.

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

Appendix C

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

Public bodies

(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.

Submission 1

Irish Traveller Movement ITM, National Traveller Women's Forum and Pavee Point Traveller & Roma Centre (Joint Submission)

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Submission 2

CENA Approved Housing Body

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.

Submission 2

CENA Approved Housing Body

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 Council^[1] 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)

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.

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CENA Approved Housing Body

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.

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

Submission 3

Clúid Housing – Approved Housing Body

To offer guidance on Kildare County Council’s Traveller Accommodation Strategy based on Clúid Housing’s experience providing housing to Traveller residents.

Introduction

Designing and implementing effective strategies to provide Travellers with appropriate housing requires a comprehensive approach which is culturally sensitive and inclusive. Traveller specific accommodation must be accessible and appropriate in its design and, where required, it should come with individualised support services to ensure tenancies are a success.

Clúid’s current pipeline of properties will be funded through CALF or, in the case of our Cost Rental units, CREL. As such, Clúid does not intend to develop CAS funded specialist housing at this time. However, Clúid has experience providing Traveller accommodation, both through CAS funded purpose-built schemes and through allocations to our CALF funded general needs tenancies. As such, Clúid is in a position to provide guidance based on our experiences in this area.

Flexibility and Options

It is often the preference of Travellers to be housed together with extended family. This necessitates the continued development of Traveller-specific schemes or clusters of designated units for families within larger developments. On this basis, we believe a flexible and nuanced approach to nominations and allocations should be adopted to ensure that tenants are assigned units which suit their individual needs and preferences

This approach ensures that respect is given to the culture and traditions of Traveller communities. Alongside flexibility in allocation, there should be some level of flexibility in design. For example, units may require space for mobile homes, sheds, or grazing space for animals. While the provision of additional space is not always possible, Travellers should be given the option to select Traveller-specific accommodation on housing application forms, if they wish to be allocated a unit of this type.

Community Engagement and Consultation

Clúid’s experience suggests that early consultation and community engagement are essential to the long-term success of Traveller-specific housing. It is vital to speak with potential residents, Housing Officers, and, where appropriate, support workers to ensure residents are set-up for success.

Submission 3

Clúid Housing – Approved Housing Body

This process of consultation and engagement should continue throughout the lifetime of a scheme. Ongoing dialogue with individuals and wider Traveller communities is required to understand specific needs and changing preferences regarding housing. Local authorities should therefore establish a robust system for monitoring and evaluating the effectiveness of their housing strategies, with mechanisms in place to reevaluate aspects of a plan which are not working as intended. This should be done in an open and transparent manner, which allows Travellers to have a say in decisions which impact them.

Wrap-Around Supports and Staff Training

It may be the case that some residents will require additional supports to retain their tenancies. This should be factored into allocations. Where required, Local Authorities should partner with support providers to ensure wrap-around services are in place upon commencement of a tenancy. This may include mental health or addiction support, assistance in accessing employment or education, support with literacy, or any number of other services which may contribute to the success of a tenancy.

In order to facilitate this work, it may be beneficial for Local Authority and AHB staff to complete Traveller Cultural Awareness Training (TCAT). Such training can help staff to understand the unique culture of Travellers as a recognised ethnic minority group in Ireland. Furthermore, this recognition ensures that Travellers are protected from discrimination based on their ethnicity. As such, all organisations involved in housing of Travellers should implement policies and programmes that actively combat discrimination and promote inclusivity within the sector.

It is also important to address discrimination towards Travellers amongst the wider communities in which they are housed. While Clúid sometimes receives negative responses from those living near our General Needs schemes, this stigma can be particularly acute when it comes to developments for Travellers. Any efforts on the behalf of the local authority to tackle racism and discrimination will undoubtedly benefit Travellers housed with them and beyond.

At Clúid, we have invested in a Quality in Our Diversity project which outlines a 5-step process aimed at creating welcoming and inclusive communities for people of all backgrounds. So far, the Quality in Our Diversity framework has been adopted by three of Ireland's leading AHBs and it is hoped that it, or something similar, will eventually be implemented by local authorities.

Submission 3

Cluid Housing – Approved Housing Body

Underspend of Traveller Accommodation Budgets

It is vital that all funds allocated for the provision of Traveller accommodation are spent in full. Where capacity is an issue, AHBs like Clúid could be consulted to explore the possibility of collaborating to deliver or manage units.

In order to prevent budgets being underspent on an annual basis, planning should take place on a multi-year basis with an agreed pipeline of properties ensuring the delivery of units reflects allocated funds.

It is also crucial that additional funding be factored into Traveller accommodation budgets to provide for retrofitting of existing units and planned maintenance. Stock condition surveys should be arranged to determine the extent of funding required in this area.

Case Study

Castle Meadows, Trim

- *Owned by Meath County Council. Managed by Clúid.*
- *Location: Trim, Meath*
- *Number of units: 14*
-

Below we set out a number of strengths and challenges associated with this scheme. The strengths of this scheme are a result of strong collaboration across all involved stakeholders and a commitment to the provision of good quality, secure homes for Travellers. In terms of the challenges, there are potential learnings which may be of benefit to local authorities. They also point to opportunities for further engagement with local authorities, the Department of Housing, Local Government and Heritage and the Housing Agency in devising solutions to deliver even better Traveller-specific accommodation in the future.

Strengths

- *Provision of 14 good quality homes to the Traveller community.*
- *Allowed families that had lived together previously to be housed together again.*
- *Mix of multi-storey houses and bungalows to suit different needs.*
- *All families were provided with choice of flooring, fireplace, and kitchens to minimise the financial burden of setting up the property.*

Submission 3

Cluid Housing – Approved Housing Body

- *Each home has a space to park a caravan and a vehicle. This is important to Traveller families who are still involved in touring.*
- *On-site community centre with an anchor tenant. An Involve Youth Project is run from this facility. Centre also provides space for meetings with families in a neutral setting if required.*
- *On-site caretaker who is a fulltime employee of Meath County Council.*
- *Clúid organises a 'skip day' once per year to prevent dumping on the estate.*
- *Located close to Trim town and its amenities.*

Challenges

Management

- *The scheme caretaker reports directly to the LA. Clúid's preference is to line manage staff onsite directly to ensure facilities management is as coordinated as possible.*
- *The dedicated social worker from the Local Authority was active at the allocations stage but support appears to have been removed once residents were housed. Given the huge change in lifestyle many families experienced in taking up these tenancies, ongoing support from a social worker would have been beneficial.*
- *Careful consideration needs to be given to any new family going into this estate. This can be time consuming and can extend void times.*
- *Some residents struggle with literacy, which can create communication problems, particularly in the process of rent assessment.*

Design and Safety concerns

- *New fire regulations were introduced since this estate was built. Where touring caravans are allowed, fire walls should be in place to protect the dwelling.*
- *While residents had agreed to only use caravans for touring purposes, it has been observed that they are regularly occupied overnight by friends and family. This represents a high degree of risk, especially in the context of new fire regulations.*
- *When this development was first built, a barrier was put in to stop mobile homes and high-top vans gaining access. Unfortunately, there was a house fire, and fire services could not release the barrier. This caused grave concerns and was removed after the incident. Residents approved of this decision as they felt the barrier drew attention to the estate and increased the negative perception of the development amongst the wider community.*
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Submission 3

Cluid Housing – Approved Housing Body

Voids

- *Given the shortage of Traveller accommodation, in particular schemes which allow extended families to live together, means that voids must be boarded up immediately to prevent unauthorised occupation, which is costly. If notice of vacation is not given by the family, the property can become occupied without authorisation.*
- *Some Travellers who have been housed here find it hard to settle. This has increased the number of voids.*

Consultation

- *13 of the 14 houses have asked for grass to be removed. These families prefer yards/concrete. Residents expressed that they did not wish to maintain grass or engage in gardening. Consultation with residents at the design phase could have prevented these issues.*
- *The parking bay on the estate is rarely used by residents. As a result, unauthorised occupants have camped in it. This space could have been put to alternative use had it been raised with residents prior to development.*

Submission 4

Irish Coalition to End Youth Homelessness – Focus Ireland

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,[1] 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.[2]

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.[3]*
- Enhance connectivity between local authorities and Tusla, to ensure that appropriate supports can be provided.[4]*
- 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.[5]*
- 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.[6]*
- Establish Youth Tenancy Support Programmes.[7]*
- 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.*

Submission 4

Irish Coalition to End Youth Homelessness – Focus Ireland

[1] 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.

[2] National Youth Homelessness Strategy Action 21: Include specific actions in future Traveller Accommodation

Programmes (TAPs), to address youth homelessness.

[3] Action 2.

[4] Action 4.

[5] Action 8.

[6] Action 15.

[7] Action 23.

Submission 5

Councillor Seamie Moore, Naas Municipal District, Kildare County Council

I wish to make the following submission to the Chief Executive of Kildare CC on the Traveller Accommodation Programme 2025–2029.

It is my firm belief that there are two policies that must be considered together when accommodation for the Traveller Community is being examined as a programme.

1. First Consideration – Options on ‘Halting Sites’, ‘Traveller Specific’, ‘Settled Housing’ or ‘Caravan Travelling’.

In the first consideration we should be examining the progress towards full integration of the Traveller Community into a national system that will benefit the traveller community over the previous decadent, impoverished and disadvantaged systems of accommodation of the past. Where dissident family groupings are placed in accommodations in close proximity to each other, even when they are ‘towns apart’, the original ‘grouping and separation’ becomes a reason for anti-social disturbances between such ‘population developed’ groupings. In my opinion, the Local Authority is facilitating the ‘dissent’ and the evolving incidents between such ‘family or ‘clan’ groups by ‘containment’ in over crowded halting sites or site specific settlements, for many years, over which they exercise very little control.

The future threats of ‘dissident legacy differences’ between families, where they are known to exist, must receive a primary consideration when this programme is being prepared.

Despite the strong held views of many members of the Traveller Community that they are born to live their lives as ‘nomads’ and should be allowed to continue their lives in that manner, the evidence gleaned over the past, ten-fifteen years, would indicate that ‘settlement’ into the general community, is proving far better for living conditions, education options and economic opportunities. That evolvement must be given every opportunity to develop further.

These conditions, education options and opportunities are in turn, providing much greater economic benefits, reduced societal dependency, reduced trauma and increased personal independence and freedoms.

Add to those considerations we now have proven Census Data on the shortened longevity of the lives of members of the Travelling Community as a result of a list of those short comings, combined with their various levels of living conditions.

Kildare County Council can take credit that having invested in the ‘spread’ of Traveller Accommodation options over a range of different type of accommodations during the past 20 years, with various support services provided to suit each type of accommodation, that it has achieved a great deal of progress and accumulated valuable knowledge from those ‘option provisions.’

Submission 5

Councillor Seamie Moore, Naas Municipal District, Kildare County Council

2. Second Consideration - Social Housing in Communities

Despite misgivings among the 'settled community' of 'integrating a traveller family into housing estates, the 'settled communities' have proven very resilient to 'early day' problems and there is now a very large 'acceptance to 'traveller integration' where it is not 'overdone'.

Likewise, despite misgivings on the part of traveller families, they too have, in the vast majority of cases' accepted the new arrangements as 'normal'.

The National Television Service RTE has highlighted on many occasions how this integration 'settlement' system has proven to be very popular and successful in many locations throughout Ireland, particularly with traveller families with young children and young women. Traveller children and young women deserve to have this 'opportunity of change'. It is accepted that there may be some older members of the Traveller Community who may find it very problematic to live in 'community housing'.

There is a strong 'social' need to develop standard 'community interests' among the Traveller Community, in a selection of sports, education, work experiences and general integration with community involvements and 'local responsibilities, especially with the younger generation of traveller families. Integration training will never be successfully experienced in 'Traveller specific' or 'halting site' accommodations. The opposite 'separation' is determined by 'separation'.

It is my considered opinion that 'settlement into standard or social housing' has proven to be the system with the best beneficial results. That system has many inbuilt protections and advantages, with social and environmental capacity building supports that may be specifically needed to support such new tenants, more readily available community-wise in large towns.

It may also be unwise to have a halting site or traveller specific housing in or near a population centre that has already provided 'settled accommodations' for traveller families as the 'diverse culture' of living styles can have unsettling influences on the different family groupings.

Submission 5

Councillor Seamie Moore, Naas Municipal District, Kildare County Council

It is therefore my recommendation to this future programme for traveller accommodation that larger populated towns like Naas, should continue to be used for 'integration' of traveller families into community living housing estates.

This will allow for a more contented generational development and successful integration of families that have chosen to go the route of 'settled accommodation' in 'integration towns' where better social, educational and economic lifestyles and opportunities are available.

It is also my recommendation that other forms of traveller specific housing or halting sites should not 'clash' with the 'settled accommodation approach' in large populated towns by ensuring the programme keeps the families with different chosen lifestyles in different locations.

I make this submission to assist the makings of a new programme 2025-2029 and wish the Local Authority, Kildare CC, every success with its programme for those of the Traveller Community from Kildare who are seeking suitable accommodation in Kildare.

Kildare, as the Local Authority should have responsibility only for those that have traditionally lived in Kildare and have chosen Kildare as the county in which they wish to continue to live.

I wish to be contacted with the various decisions, judgements and recommendations on each stage of the making of this new Traveller Accommodation Programme 2025-2029 for Kildare County Council.

Submission 6

Kildare Traveller Action – KTA

Kildare Traveller Action welcomes the opportunity to submit comments and recommendations to the Kildare County Council draft Traveller Accommodation Programme (TAP) 2024–2028. KTA’s submission does not include all Travellers living throughout Kildare, it only includes the Travellers that are currently engaged with the organisation. Population: The population in Kildare consists of 365 families with 1480 individuals, about 500 are children under 15 years. KTA currently is working with approximately 200 plus families. This number is increasing with our outreach plans.

This submission includes recommendations in the following areas:

- 1. Travellers living on the side of the road/unofficial sites*
- 2. Those in Emergency Accommodation in the county*
- 3. Official Sites*
- 4. Group Housing Schemes*
- 5. Standard Housing*
- 6. Young Couples & New Families*
- 7. Racism*
- 8. Mental health*
- 9. Conclusion*

We are hopeful that if the recommendations contained in this submission are accepted, there will be benefits for the wider community in Kildare, all the agencies that work in Kildare, the Traveller community themselves and those charged with responsibility to provide culturally appropriate accommodation for them.

1. Travellers Living on the Side of the Road/unofficial sites 2024

Regardless of the reasons why families find themselves living on the roadside, these families are in an extremely vulnerable position. In response to the situation that these families find themselves in, there is an onus on the local authority to provide emergency accommodation and/or facilities where appropriate.

This is a crisis situation for KTA and in line with current research which outlines that the national homeless crisis impacts more negatively on disadvantaged communities such as Travellers.

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Kildare Traveller Action – KTA

KTA are in no doubt that the number of families taking to the roadside will continue to increase year on year during the lifetime of the plan and in particular young and newly married families due to a lack of accommodation in the county. It is imperative that the families on the side of the road/ in unofficial sites in the county are prioritised for appropriate accommodation and that in the interim sufficient services are put in place to ensure these families can live safely with dignity and respect as a basic human right.

KTA is concerned with the high number of children who are currently on the roadside over 40. We recommend that safe zones need to be designated by Kildare County Council; where Travellers in caravans can go temporarily while awaiting more secure accommodation provision. These zones should have the basic facilities that are needed such as toilets, showers, electricity and refuse collection. It would ensure that services operating in Kildare can access these vulnerable families easily and ensure the appropriate supports are put in place to try to minimise the long-term negative impact on people's physical and mental health.

We believe that if these safe zones are designated this will be welcomed firstly by the Traveller families themselves, and secondly by the residence in the towns in Kildare who are understandable frustrated and concerned with the number of Travellers on the side of the road. We believe this will also be welcomed by all the statutory agencies, not least An Garda Síochána and the County Council executive who are spending time and resources consistently moving people on, while knowing they have nowhere to go. KTA recommends that the TAP 2024–2028 represents the crisis situation that we are currently in and addresses it with urgency.

The health and safety of Travellers on the roadside needs to be prioritised in providing basic human rights and facilities to prevent health outbreaks.

There are a number of Traveller families who travel to Kildare for work during the year. This is historical and these families while travelling temporarily need to have consideration within the accommodation plan with provision of temporary services.

KTA recommends: A Full needs assessment of the Traveller families on the side of the road be carried out and provision in the TAP 2024–2028 to accommodate them in suitable and appropriate accommodation.

Safe Zones: which are fully serviced be set up in Kildare where Travellers are roadside, in areas like Maynooth, Kildare, Monasterevin. These would provide safe serviced spaces for families especially those with children while more suitable accommodation is sourced.

Submission 6

Kildare Traveller Action – KTA

2. Emergency accommodation

KTA is concerned at the number of Travellers who are in emergency and temporary accommodation and are homeless. The families we work with have reported to us that this situation is having a detrimental impact on their mental health with overcrowding, lack of facilities and the length of time they are having to stay in this situation. KTA feels that priority should to be given to Travellers who are homeless, or in emergency accommodation to find more suitable accommodation especially where

- their mental health is impacted*
- Where domestic abuse is present and families are fleeing danger*
- for those who have children with additional needs such as autism ADHD and*
- When they have been in the emergency accommodation for 12 months.*

KTA Recommends that a more holistic wraparound support should be provided to these families with priority given to ensure more secure accommodation is provided. Currently KTA is working with 7 families in emergency accommodation all who have young children and who have identified that their mental health has suffered as a result. Two of the families have children with additional needs such as ADHD, Autism and the need to respond to the accommodation need for children with additional need is vital. This needs to be considered by the local authority when prioritising families for accommodation. It is known that Travellers tend to have larger families and this needs to be considered when providing suitable emergency accommodation.

KTA is concerned that when Travellers who are homeless present to the service they are required to find their own accommodation when emergency accommodation isn't available to them. They are expected to search for hotels for their own accommodation and if the hotel is willing to accept payment from invoices, many hotels aren't willing accept them when a Traveller is presenting. We believe this is adding undue mental health difficulties stressors to Travellers a number of whom have contacted KTA for support in this area.

KTA recommends that where a Traveller is tasked with finding hotel accommodation support from the County council is provided to find a suitable space for the family. A list of hotels which the county council has built a relationship and is willing to provide accommodation should be provided and especially where children are concerned immediate support given. The majority of hotels contacted will not accept invoiced payments and will only accept pre-payment a more user friendly system will need to be found to support Travellers emergency accommodation needs in this regard. We would recommend that this needs to be resourced in a different way so that the impact on mental health is lessened and what is a stressful and difficult time in someone's life is not exacerbated further by having to source their own emergency accommodation. Travellers often are refused entry to the very hotels they are trying to find for emergency accommodation in and this can often be extremely distressing for the family involved.

Submission 6

Kildare Traveller Action – KTA

3. Official Sites

There are three official sites in County Kildare, Tankards garden, Newbridge, Ardrew Athy, Blacklion Maynooth

KTA welcomes the completion of improvements to the Newbridge site and the proposed redevelopment of the Athy site. Improvements are needed in the Blacklion with residents worried about the mould and need for deep retrofit and upgrading of their homes there. This needs to be prioritised in the new Traveller accommodation plan.

The Ardrew halting site in Athy is prone to flooding and needs remedial work to ensure that it is safe and healthy.

4. Group Housing

Evidence across the country has shown that when small group housing schemes are provided to Traveller families the results are positive and remove some of the issues of large groups of Travellers being housed together which has on occasion lead to conflict. When the immediate family are accommodated in this manner it can have positive outcomes. We have families who would like to avail of group housing as their preferred accommodation in Naas, Newbridge, Kildare and across the county.

KTA recommends that group housing schemes are developed as part of the new Traveller Accommodation Plan. KTA recommends that over the life of the plan that 6 such developments are identified, planned and implemented over the life of the Accommodation plan.

5. Standard housing

Most Travellers are in standard accommodation whether private rented or county council provided accommodation. The number of families that KTA have supported in these areas are coming from overcrowded accommodation and there are significant issues with the accommodation where cold damp conditions exist. KTA recommend that a deep retrofit be completed in the life of this plan. Given that there is evidence of poorer health outcomes for Travellers providing homes which are safe free from mould and damp and are warm should be a priority of the county council especially in an environment where being more energy efficient is important.

KTA is constantly being asked to support families who are in substandard accommodation and often in overcrowded spaces. We currently work with 6 families with 4 or more children one family has 8 children in a three bedroom house and this overcrowding is an issue for those with larger families. This needs to be addressed in the development of accommodation plans and larger dwellings sourced for such families.

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Kildare Traveller Action – KTA

Accommodation: The KPI figures for 2023 showed that 39 individual Travellers were signposted to the local authority for accommodation issues. These issues include roadside, emergency, homeless and unsuitable accommodation. These families are vulnerable with many challenges including mental health issues, family support poor health and /or with special needs children.

6. Young Couples and new families

KTA currently have over 300 Travellers in Kildare in the 15-25 age category who are consented to work with the Primary Healthcare team. It is likely within the life of the plan that a majority of these young people will be getting married and starting their families. This will need to be considered in the housing need in the lifetime of the plan.

7. Racism

KTA works with over 200 families, and those who have sought support from us related to accommodation have all spoken about their feelings when having to engage with services. The feeling that Travellers express most to us when interacting with officials from county council departments in relation to accommodation are mostly negative. Being hung up on, spoken to abruptly, not communicated with in relation to their application, being spoken down to, being told to stay with friends and family when they are homeless and don't have this option open to them have all been identified to us in KTA as issues which are not helpful and antagonise. While these situations may arise because of pressure related to work the perception that Travellers have because of the racism they experience is negative and staff would need to be mindful of the duty of care they have in this regard.

8. Mental Health

The social determinants of health model identify the impact of poor accommodation on health and when responding to accommodation in the Traveller community this needs to be acknowledged and something needs to change so that the health impact on Travellers is lessened.

Our outreach work shows mental health as a major issue. The KPI showed 252 individuals received support for mental health issues while 40 individuals required referrals to the relevant services. Travellers who we have worked with in the last year have identified the impact that their living situation has been having on their mental health especially those in emergency accommodation or on the roadside.

The impact of poor mental health can have an impact on maintaining tenancies and KTA would recommend that if Travellers tenancies are being put at risk due to mental health issues that additional wraparound supports be identified to support these vulnerable tenants. KTA is willing to support the county council in these areas in identifying suitable solutions before evictions happen.

Submission 6

Kildare Traveller Action – KTA

9. Conclusion

KTA and Travellers have for a long time raised the issue with Accommodation

- *Homelessness, roadside families over 40 children living roadside*
- *Overcrowding, couch surfing*
- *Sub standard accommodation need to upgrade and make it more energy efficient.*
- *Need for building Traveller specific group housing 6 families who would avail of this.*
- *Young families over 300 young Travellers who in the lifetime of the plan will need accommodation.*
- *Supporting the families in homeless, emergency accommodation to access suitable long term accommodation*

There is a need to implement the actions from the Traveller Accommodation Plan 2024-2028 and that the same issues do not emerge in the next plan. Solutions need to be found which are workable for all of the needs within the Traveller community.

Submission 7

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

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.

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 cardiovascular disease, diabetes and hypertension (12% diagnosed with diabetes and over 10% with undiagnosed diabetes).

Submission 7

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

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.

Submission 7

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

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

<p>35</p>	<p>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.</p>	<p>HSE PublicHealth + Local Authorities + other relevant agencies.</p>	<p>NTRIS (Action 79) Healthy Ireland: A Framework for Improved Health and Wellbeing</p>
<p>36</p>	<p>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.</p>	<p>Health + other relevant agencies.</p>	<p>Healthy Ireland: A Framework for Improved Health and Wellbeing</p>

Submission 8

National Traveller MABS Submission 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 schemes[1]. 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 provision of fuel efficient affordable culturally appropriate accommodation[2]. 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 homes[3]. 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 income[4].

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.

Submission 8

National Traveller MABS Submission February 2024

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.

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.

Submission 8

National Traveller MABS Submission February 2024

Recommendations for the Traveller Accommodation Programme 2025–2029

- 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.

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National Traveller MABS Submission February 2024

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 Government[5].

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 fuel[6].

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 measures[7]. A follow up study carried out in 2022 showed that a large majority of the Traveller families living in trailers surveyed (~75%) were paying between €120 - €360 on electricity, and €105- €400 on heating fuels (i.e. gas, coal wood) on a monthly basis[8]. 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.

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National Traveller MABS Submission February 2024

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 contribute to reduced energy spend^[9]. 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 Travellers^[10]. 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 years^[11]. 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.

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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:

- *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.*
- *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.*
- *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.*
- *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.

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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 accommodation^[12].

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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.

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