

An account of the Equality Review carried out by Donegal County Council in respect of Traveller-specific accommodation



Coimisiún na hÉireann um Chearta
an Duine agus Comhionannas
Irish Human Rights and Equality Commission



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Glossary

1998 Act: Housing (Traveller Accommodation) Act 1998

2009 Act: Housing (Miscellaneous Provisions) Act 2009

2011 Assessment Regulations: Social Housing Assessment Regulations 2011 (S.I. No. 84/2011)

2011 Allocation Regulations: Social Housing Allocation Regulations 2011 (S.I. No. 198/2011)

2014 Act: Irish Human Rights and Equality Act 2014

AHB: Approved Housing Body

AO: Administrative Officer

Capital expenditure: Generally relates to the costs of acquiring, upgrading or extending physical assets, such as buildings, equipment or facilities

Current expenditure: Also referred to as 'revenue expenditure'. Generally relates to operational costs, for example it may include operational costs of maintenance, caretaking, social worker provision or provision of emergency accommodation

CBL: Choice Based Lettings

CDP: Community Development Project

CENA: The Traveller-led Voluntary Accommodation Association (TVAA)

CLO: Community Liaison Officer

DCEDIY: Department of Children, Equality, Disability, Integration and Youth

DHPLG: Department of Housing, Planning and Local Government, known as the Department of Housing, Local Government and Heritage (DHLGH) since 30 September 2020

DoJ: Department of Justice, formerly known as the Department of Justice, Equality and Law Reform

DSP: Department of Social Protection, formerly known as the Department of Employment Affairs and Social Protection

ESA: Equal Status Acts 2000 - 2018

HAP: Housing Assistance Payment

HAO: Housing Assessment Officer

HLO: Housing Liaison Officer

HNA: Housing Needs Assessment

HWO: Housing Welfare Officer

LGMA: Local Government Management Agency

LTACC: Local Traveller Accommodation Consultative Committee

NTACC: National Traveller Accommodation Consultative Committee

RAS: Rental Accommodation Scheme

Revenue expenditure: Also referred to as 'current expenditure'. Generally relates to operational costs, for example it may include operational costs of maintenance, caretaking, social worker provision or provision of emergency accommodation

SEO: Senior Executive Officer

SHCIP: Social Housing Capital Investment Programme, sometimes referred to as Social Housing Investment Program (SHIP)

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SICAP: Social Inclusion and Community Activation Programme

TAER: Traveller Accommodation Expert Review, July 2019

TAO: Traveller Accommodation Officer

TAP: Traveller Accommodation Program

TAU: Traveller Accommodation Unit

TIF: Traveller Inter-agency Forum

TIG: Traveller Inter-agency Group

Introduction

Under section 32(1) of the *Irish Human Rights and Equality Commission Act 2014* (the '2014 Act') the Commission may invite a particular undertaking to carry out an equality review.

In June 2019 the Commission invited Donegal County Council (the 'Council') to undertake an equality review in the following terms:

1. That the Council would conduct an audit of the level of equality of opportunity and/or discrimination that exists in relation to members of the Traveller community who wish to avail of Traveller-specific accommodation, having regard to the drawdown by the Council of capital funding provided by the Department of Housing, Planning and Local Government for the provision of Traveller-specific accommodation having regard to the Council's obligations under the ESA; and
2. That the Council would conduct a review of its practices, procedures, and other relevant factors in relation to the drawdown of capital funding and the provision of Traveller-specific accommodation services to Travellers to determine whether those practices, procedures and other relevant factors are conducive to the promotion of equality of opportunity for these service users having regard to the Council's obligations under the ESA.

In conducting any equality review, the Commission requested that the Council would address and report on a number of specific issues. (See [Appendix 1](#))

The Council submitted its initial Equality Review response to the Commission on 30 August 2019. Following consideration of the Council's response, the Commission sought clarifications by letter dated 24 April 2020, which were provided by the Council by letter dated 09 June 2020.

This is the Commission's account of the Council's Equality Review that, pursuant to section 28(2) of the 2014 Act, is being published as part of the Commission's 2020 Annual Report.

It comprises three sections, namely:

1. **Key areas of interest** – which is a synopsis of the Equality Review undertaken, and the information provided, by the Council;
2. **Issues arising** – which comprises the Commission's consideration of the information contained in the Equality Review as undertaken by the Council; and
3. **Recommendations** – proposed recommendations from the Commission to the Council.

Section 1 Key Areas of Interest

A. Initial and ongoing assessment of Traveller-specific accommodation needs

The Council states that it has an excellent working relationship with Donegal Travellers Project and an efficient and functional LTACC, where the chairperson of the LTACC is a member of Donegal Travellers Project.

The Council identifies consultation and daily interaction between the Council's TAO and Donegal Travellers Project staff as a key component in relation to advising and informing on the provision of accommodation services to members of the Traveller community in Donegal. It also states that the LTACC has had a key role in facilitating the meeting and exceeding of objectives and targets set out in the past two TAPs.

In a letter setting out further clarifications dated 09 June 2020, the Council states that it has a full time TAO who has a key role in coordination and achieving solutions for members of the Traveller community based on their specific needs. The Council states that the TAO and local staff within each Public Service Centre in each municipal district work closely together in order to provide services, including accommodation solutions, and that the TAO arranges to meet directly with individuals/families at their local Public Service Centre, as necessary. The Council states that the ongoing review of cases is carried out by the TAO and the relevant local area manager, as part of the service delivery.

The Council states that the review meetings are held at least on a monthly basis between the TAO and the Director of Service / SEO to ensure implementation issues are progressed across the county and to ensure that any arising issues are addressed.

The Council reports that a further initiative that is in place specifically for members of the Traveller community is a dedicated call clinic which is held twice a week. It states that this allows direct linkage to the TAO, where issues can be discussed and raised directly.

The Council reports that it also has a central capital unit that assists with various design/technical issues, site supervision or projects and with funding claims and recoupments for capital projects, in conjunction with the TAO.

No information is provided in the Equality Review in relation to formal tenant participation processes in estate management facilitated by the Council.¹

B. Comparison of funding to comparator group

Over the duration of the TAP 2014-2018 and up to August 2019, the Council provides the following breakdown in respect of the total funds for Traveller accommodation capital projects:

- Amount allocated by the DHPLG:	€1,079,716
- Costs actually incurred by the Council:	€1,509,447
- Drawdown received from the DHPLG:	€818,135
- Drawdown awaited from the DHPLG:	€641,062

The Council states that it sources funding to meet general housing needs from a range of sources including SHIP and other initiatives such as the leasing programme, HAP, RAS etc. The Council states that over the course of the previous TAP, in excess of 70 units of accommodation were delivered through a range of social housing measures.

The Council states that, as of August 2019, over 60% of the entire Traveller population in County Donegal resides in standard local authority housing.

The expenditure tables submitted by the Council relate to a range of projects, including the allocation of accommodation via acquisition, new schemes, 'voids' that have been

¹ In June 2021, after receiving a draft copy of the Commission's account of the Council's Equality Review, the Council has advised the Commission of the following in relation to tenant participation processes:

"[t]enant participation is an ongoing and continuous aspect of the Council's work in consultation with residents and Donegal Travellers Project. Engagement and formal meetings between all parties has and continues to have positives outcomes for all concerned. There is a sense of ownership on the residents['] part and a general improvement of Traveller-specific sites as the specific needs of residents living on the sites are met. The residents and Donegal Traveller Project are effectively making decisions to improve the living conditions on sites assisted and implemented by the Council. Donegal County Council has a very strong relationship with residents and Donegal Travellers Project in relation to Tenant Participation Programmes on Traveller-specific accommodation".

refurbished, houses leased etc. The Council states that these were allocated on a case by case basis depending on individual circumstances and priorities. The Council explains that the amount of funding spent in this respect is not systematically recorded against specific groups, such as members of the Traveller community, therefore it was not possible to specifically outline the actual spend in respect of the provision of such accommodation.

No separate tables were submitted by the Council setting out general housing expenditure over the same period and so no comparison could be drawn between that and expenditure on Traveller-specific accommodation.

No information was provided in the Equality Review regarding the provision of transient sites in the Council's functional area.²

C. Adequacy of funding

The Council states that it has delivered on all objectives and targets contained in the previous TAP of 2014-2018.

D. Whether all funding allocated drawn down

The Council states that over the course of the TAP 2014-2018, funds allocated by the DHPLG for Traveller accommodation were not drawn down in full in any year. The Council states that this was due to delays in the completion of the relevant projects. It states that there were a number of projects that were not completed within the

² In June 2021, after receiving a draft copy of the Commission's account of the Council's Equality Review, the Council has advised the Commission of the following in relation to the Council's review, under the TAP 2014-2018, in relation to the provision of transient accommodation:

"The Council's Transient review process arose when the [TAP] 2014-2018 adopted by Council members on 27th January 2014 committed as one of its four main objectives to completing 'an overall comprehensive review of the position in terms of Transient accommodation, including such provision at regional / national level by the last quarter of 2014 with an action plan developed'. Following consideration by the [LTACC] the review included three key components; (1) Present position in the County in relation to Transient Accommodation (2) Pattern of nomadic movement of Travellers in the County over the past two years (3) Position in relation to Transient accommodation of six other local authorities in the general North Western region of the Country. The conclusion of the review as ratified by the LTACC having considered all factors including the use of existing Transient sites in the Council, consultation with adjoining and cross border local authorities etc., found that the evidence indicated that there was not a demonstrated need for Transient families to be catered for by means of Transient sites in the County. In light of the findings of the review, it is concluded that there was no identified requirement for a Transient site in Co. Donegal".

timeframe and others that carried into the following year. The Council gives examples of delays that have occurred including: a delay of over 12 months in relation to the significant refurbishment project at Ballintra; the current project at Trentaghmucklagh, St. Johnson, which was initially commenced in 2016; the project completed at the Big Isle halting site; and a further project at Station road, Ballyshannon.

The Council reports that these delays arose due to difficulties encountered on a number of levels. Examples of the difficulties cited include family refusal to move to refurbished site and 'difficult family negotiations'. The Council also cite, in particular circumstances, issues relating to damage of property by arson and acts of vandalism, as well as alleged intimidation of a contractor.

The Council recommends that there should be a more transparent methodology to reflect these types of situations where a local authority has been prevented from advancing a project, as opposed to a table which details a funding allocation to a local authority in the early part of the year and a corresponding 'nil' draw down figure at the end of the same year.

The Council explains that there is a further cause for funds not being drawn down. This is where the Council has completed projects and is awaiting recoupment / drawdown from the DHPLG. The Council states that not all projects receive funding allocation in advance of commencement.

The Council draws the Commission's attention to a revised procedure that has been notified to local authorities (Circular 03/2020). It states that this revised protocol should ensure a more accurate reflection of project delivery on the ground going forward. The Council gives the example that it was 'allocated' a budget of €161,000 in 2019 and while 'nil' spend was recorded nationally for Donegal in 2019, the actual spend on Traveller accommodation capital projects in Donegal that year was just over €720,000.

E. Any further issues of equality of opportunity

No distinct further issues were raised.

Section 2 Issues Arising

On the basis of the information provided by the Council, as summarised in Section 1, the Commission has considered the following issues arising:

The Equality Review process

There is no indication of the process pursued by the Council in preparing the Equality Review. In particular there is no mention of any participation by the LTACC or by local Travellers or Traveller organisations which would be expected in such a process.

Supports

The Council's TAO is noted as providing the core supports to local Travellers. The TAO has a key role:

“in coordinating and achieving solutions for members of the Traveller community based on their specific needs”

and works with local Public Services Centre staff in each district to

“provide services, including accommodation solutions”.

It is stated that the TAO works full time and arranges to meet directly with individuals/families at their local Public Service Centre, as necessary, and operates a dedicated call clinic twice a week. The TAO reviews cases with the relevant local area manager and attends meetings with other services of the Council on a monthly basis. There is no detail provided by the Council, however, regarding the types of outcomes for Travellers engaging with these supports, Travellers' experiences of these supports, and, in particular, how these supports are deployed to work with Travellers to assess their accommodation preferences and to support delivery of targets in regard to Traveller-specific accommodation.

Engagement and consultation with the Traveller community

The current TAP notes the approach by the Council to service provision based on consultation with local Travellers and Donegal Travellers Project. An interagency approach is also noted, in the TAP and in the Equality Review.

The Equality Review notes that the Chairperson of the Council's LTACC is a Traveller representative (a member of staff with Donegal Travellers Project), that the Council has an 'efficient and functional' LTACC, and that the Council places 'high regard on the benefits of the LTACC'. The Council, in both its current TAP and in its Equality Review, note the very positive working relationship the Council maintains with the local Traveller organisation (Donegal Travellers Project) noting in its review 'daily interaction' between the Council's TAO and Donegal Travellers Project staff.

The TAP 2014-2018 notes that:

"[t]he Council encourages the participation of Travellers in the Management and Maintenance of sites, with support from Donegal Travellers Project".

While there is no similar reference in the current TAP, in June 2021, the Council has advised that this continues to be the case and that:

"[t]he residents and Donegal Traveller Project are effectively making decisions to improve the living conditions on sites assisted and implemented by the Council".

While the Council states that this involves: 'engagement and formal meetings between all parties' and that 'there is a general improvement of Traveller-specific sites as the specific needs of residents are met', no further detail is provided in the Equality Review regarding the types of outcomes from the Council's 'Tenant Participation Programmes' in respect of Traveller-specific accommodation.

Accommodation need and preferences

The current TAP indicates that the target of providing '32 units of accommodation through a range of Social Housing measures' over the period of the TAP 2014-2018, was exceeded, in that '[i]n excess of 70 units of accommodation were delivered'. There is no information provided, however, in the TAP or the Equality Review, in regard to the breakdown of this provision by accommodation type.

The current TAP indicates that of 92 Traveller families identified as having a long term accommodation need:

“35 have not submitted an application for Social Housing Support/are not qualified applicants”.

The lack of detail provided means it is not possible to ascertain how many of these 35 families applied for, but were ineligible for social housing, and how many did not submit an application. This raises potential issues in that, while some of those in the latter group may have made an informed decision not to apply on the basis of knowing they would be ineligible, there may be others who did not apply as they were not sufficiently informed or supported to complete an application.

In its Equality Review, the Council notes that:

“[i]n Donegal, the large percentage of Traveller families opt for standard social housing as a first-choice accommodation preference”.

It also reports that 60% of Travellers in Donegal are accommodated in standard social housing.

In its current TAP, the Council identifies that 60 families will require social housing supports during the period of the current TAP, and that a further 30 families are projected to require accommodation supports before the end of the TAP period. The TAP identifies that of these 60 families, 59 have expressed a preference for standard social housing, and one for Traveller-specific housing.

This overwhelming preference for standard housing is something that would have required examination in the Equality Review, however, the issue of preferences is not addressed. There is no independent verification process identified in relation to the preferences and no tracking of these over time reported in the TAP or the Equality Review.

Draw down and funding

The Council sources funding to meet the housing needs of Travellers from a range of sources including SHIP, the leasing programme, HAP, RAS etc. The amount of funding spent on standard housing was not disaggregated as between members of the Traveller community and members of the settled community and so it was not possible

to estimate spending for needs of the Traveller community as distinct from general social housing.

While there were delays in drawing down funds allocated by the DHPLG for Traveller-specific accommodation, the Council states that all targets of its TAP were met.

The reasons for delays in the drawdown of funds from the DHPLG for Traveller-specific accommodation, according to the Council, included difficult family negotiations, issues of damage to property and alleged intimidation of a contractor. This is of concern as works to halting sites can only be successful with the buy-in of the residents of that halting site. It is crucial that consultations with Travellers take place before the planning stage for any envisaged works in order to allow their concerns to be voiced and addressed.

In regard to two projects, where the Council reported a delay in the drawdown of funds, issues regarding conflict on site around allocation of a dwelling, and residents' refusal of offers of accommodation, were noted as the reasons for the delay. In the context of preparing an Equality Review, it would be useful to understand the Council's approach to such issues and the views of residents in this regard, particularly where such issues are related to accommodation preferences and where they result in delays to progressing work on sites.

Another reason given for funds not being drawn down was that the Council was awaiting recoupment from the DHPLG, as not all projects received funding allocation in advance of commencement.

The financial data provided by the Council indicates an overspend in their TAP budget (by approximately €429,000) between 2014 and 2019. The reasons for the overspend are not adequately clarified in the data provided. Some anomalies in regard to the information provided are also noted.³

³ In the additional review information provided by the Council, by letter dated 10 June 2020, two projects are cited to illustrate issues that can delay funding drawdown. The sites referenced are: Canal Road, and Cashel Ardara. The review notes that the Department allocated funding of €44,268 and €55,000 respectively to the Canal Road and Cashel Ardara projects. However, the initial and additional funding

The Council drew attention to changes in drawdown procedures introduced by Housing Circular 03/2020. This introduces two key changes:

- to facilitate ease of access to funding for Traveller-specific accommodation, the DHPLG will no longer allocate specific budgets to individual local authorities. Instead it is open to all local authorities to apply for and draw down funds at any time throughout the year in adherence with the single stage and 4-stage approval processes on a case by case basis; and
- it also provides for the consideration by the DHPLG of funding of standard housing applications by the local authority for Traveller-specific capital provision in certain circumstances and satisfying certain criteria including the provision of a clearly identified need and outlining why any alternatives were not considered appropriate.

Traveller ethnicity and culture

There is no analysis of the practical implications of cultural diversity for the general provision of social housing to Travellers, or reference to initiatives to develop and sustain integrated diverse communities on social housing estates. This is of concern, given the significant numbers of Travellers opting for such provision.

The current TAP recognises the nomadic aspect of Traveller culture in allowing flexibility to travel:

“Donegal County Council recognises Travellers identity as an indigenous minority ethnic group. Where Traveller families wish to leave their accommodation for short periods, accommodation will not be considered abandoned, provided Donegal County Council has been notified and has agreed the period the accommodation will be vacant”.

Provision of transient sites

The current TAP makes reference to a review, undertaken over two years, in regard to the provision of transient sites, which concluded that there was:

“no identified requirement for a Transient site in Co. Donegal”.

information provided by the Council does not include any reference to Cashel Ardara, and the data regarding Canal Road indicates an allocation of €18,000 by the Department (and a final spend of €25,617).

While the Equality Review makes no reference to this review of transient accommodation provision, in June 2021, the Council has advised the Commission that it arose under the TAP 2014-2018, a main objective of which was to carry out:

“an overall comprehensive review of the position in terms of Transient accommodation, including such provision at regional/national level by the last quarter of 2014 with an action plan developed”.

The Council advises that:

“[f]ollowing consideration by the [LTACC], the review included three key components; (1) Present position in the County in relation to Transient Accommodation (2) Pattern of nomadic movement of Travellers in the County over the past two years (3) Position in relation to Transient accommodation of six other local authorities in the general North Western region of the Country.”

It advises that:

‘[t]he conclusion of the review as ratified by the LTACC having considered all factors including the use of existing Transient sites in the Council, consultation with adjoining and cross border local authorities etc., found that the evidence indicated that there was not a demonstrated need for Transient families to be catered for by means of Transient sites in the County”.

Given the imperative to respond to the needs arising from cultural difference and the potential importance of transient sites to the nomadic tradition of the Traveller community, it would have been relevant to include the evidence for its conclusions in the Equality Review.

Interagency framework

The Council's TAP 2014-2018 references the piloting (in two areas) of an interagency framework for addressing conflict/tensions between the Traveller and settled communities. The culmination of this work was the development of a good practice guidance tool, to assist any agency to assess, plan and manage such conflict situations. The Equality Review does not reference this project, however, therefore there is no

further detail on whether this guidance is still in use and/or its reach in regard to use by other administrative areas.

The private rented sector

There is significant reference to Travellers availing of the private rental sector in the current TAP. However, despite significant research establishing discrimination experienced by Travellers in this sector, the Equality Review makes no reference to this discrimination or to processes for addressing it.

The Public Sector Equality and Human Rights Duty

There is no reference to the statutory obligations of the Council under S42 of the 2014 Act: the Public Sector Equality and Human Rights Duty, in the current TAP or the Equality Review.

The Council's TAP 2019-2024 notes the following core principles as 'fundamental in the delivery of the TAP': equality; non-discrimination; self-determination; collective outcomes; empowerment; inclusivity in decision making; commitment to anti-poverty and high standards; and human rights including children's human rights. These principles are reiterated in the Equality Review as evidence of:

"the commitment to continue to provide accommodation services to the Traveller community on an equal and non-discriminatory basis".

There is, however, no detail provided in regard to the application of these core principles within the processes, practice, outputs and outcomes of the Council in providing accommodation services to the Traveller community.

Section 3 Recommendations

The Commission recommends that the Council should undertake the following actions to strengthen the level of equality of opportunity and non-discrimination in its systems for the provision of Traveller-specific accommodation services.

1. Address policy and procedure for:
 - mainstreaming the core principles identified by the Council, as underlying the TAP, into all policies, procedures, and practices of relevance to its implementation and review;
 - presenting data in the TAPs and progress reports, in particular: providing detail on the process for assessment of Traveller accommodation needs and preferences in the administrative area; and providing a breakdown, by accommodation type, for accommodation targets and outputs;
 - tracking and independently verifying the preferences of the Traveller community in relation to type of accommodation and ensuring a respect for Traveller culture and identity in meeting these;
 - enabling appropriate processes for Traveller participation in estate management on Traveller-specific accommodation;
 - tracking the experiences of the Traveller community in seeking to secure accommodation in the private rented sector and addressing the issues identified;
 - identifying and responding to the practical implications of the recognition of Traveller ethnicity, for the provision of standard housing, including in relation to supporting and sustaining integrated communities; and
 - implementing the Public Sector Equality and Human Rights Duty in the next review of the TAP.
2. Establish and implement an ethnicity identifier in data gathering and analysis in relation to the provision of social housing and homelessness services and include all Traveller-specific accommodation options in housing applications (i.e. allow applicants identify themselves as a member of the Traveller community if they wish and for the sole purpose of identifying accommodation needs and include a list of needs/preferences any or all of which may be ticked, including,

but not limited to permanent/transient halting site, group housing, outdoor space for dogs/horses and preference to be accommodated close to family members).

3. Develop a more transparent recording of the methodology of collection and data obtained in the annual count of members of the Traveller community (for example by survey, setting out the steps taken to ensure all members of the Traveller community were reached and including such questions as multiple accommodation preferences and difficulties in accessing such preferences or other accommodation in the past).
4. Engage the services of an appropriate independent body, to determine the reasons why residents of existing halting sites seem to be hostile towards planned works on these sites and any steps that could be taken to prevent any such future hostility, particularly in respect of improved consultation processes. Any such steps taken by the Council should be published.
5. Assess over the coming years whether the new procedures set out in Circular 03/2020 of the DHPLG improve its rate of draw down for Traveller-specific accommodation. If no improvement is evident at that point, the Council should commission an independent report to determine the reasons for this and follow any recommendations made.
6. Adopt a broad equality policy incorporating discrimination on all prohibited grounds and all staff should receive training on this policy.

Appendix 1

In conducting any equality review, the Commission requested that the Council would address and report on the following:

- (a) The practices, procedures and other relevant factors in respect of the provision of accommodation services to members of the Traveller community within the Council's functional area;
- (b) The amount of funds allocated by the Department of Housing, Planning and Local Government that the Council requested to draw down in each of the last four years;
- (c) The amount of funding applied for by the Council to the Department of Housing, Planning and Local Government, but which was not drawn down;
- (d) If the entirety of funding allocation was not drawn down, to provide the reason(s) for this;
- (e) For each of the previous four years, the projects for which the Council applied for funding from the Department of Housing, Planning and Local Government and to confirm which of these received funding. To also confirm which of these projects were completed, and if not completed, to advise of the reason(s) for this;
- (f) To confirm the amount of funding in respect of general or standard housing available to the Council in each of the previous four years, the amount requested to be drawn down and the amount in fact drawn down in each of these years;
- (g) The impact that any failure to draw down allocated funds has on the Council's statutory duty to provide sites for caravans, including sites with limited facilities;
- (h) To confirm the amount of funding in respect of the provision of Traveller specific accommodation already applied for and/or that will be applied for in 2019;

- (i) To specify how the issue of applying for and drawing down funding is to be addressed in the Council's strategy for securing the implementation of its Traveller Accommodation Programme;
- (j) Whether any issues of equality of opportunity or discrimination arise in respect of the above-mentioned practices, procedures and other relevant factors with regard to the provision of accommodation services to members of the Traveller community and the failure to draw down funding for Traveller specific accommodation; that is, are these practices, procedures and other relevant factors conducive to ensuring that service users who are members of the Traveller community can avail of accommodation services on an equal and non-discriminatory basis with service users who are settled persons/not members of the Traveller community; and
- (k) Any recommendations and/or findings arising from the review.



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