

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



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The Irish Human Rights and Equality Commission was established under statute on 1 November 2014 to protect and promote human rights and equality in Ireland, to promote a culture of respect for human rights, equality and intercultural understanding, to promote understanding and awareness of the importance of human rights and equality, and to work towards the elimination of human rights abuses and discrimination.

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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)

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

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 Leitrim 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 03 October 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 05 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 carried out an assessment of need in 2019 whereby each Traveller household was invited for a consultation interview at a pre-arranged date and time to discuss their current housing need and also their projected housing needs and preferences going forward. The Council states that the results of the assessment of need, along with other relevant factors, contributed to the overall projections/targets relating to Traveller accommodation for the following five-year TAP. The Council notes that the majority of new and existing applicants for social housing expressed a preference for standard local authority housing in their assessment of need and in their housing applications, with very few families expressing an interest or preference for Traveller-specific accommodation.

In a clarification letter dated 05 June 2020, the Council states that it is its experience that over a number of years the clearly expressed preference of the local Traveller community, and in particular new applicants for social housing support, is for standard local authority housing with very limited expressions from the Traveller community for Traveller-specific accommodation. The Council observes that this is reflected in the occupancy level in the Carrick on Shannon Group Housing Scheme development, where there is little or no demand for properties as they become vacant.

The Council states that according to the most recent annual Traveller census, 60% of the Traveller households in County Leitrim are permanently housed in local authority accommodation. The Council notes that a further 25% are accommodated in long term contracts e.g. RAS, SHLI and HAP. This represents 85% of the Traveller community who are in permanent / long term accommodation. The remaining 15% are in short term rental arrangements, involuntary sharing and included on the Council's Housing Waiting List. The Council contends that these applicants / households are in constant communication with the Traveller Liaison Officer who assists them in sourcing and securing accommodation which suits their housing need.

The Council states that under its scheme of allocation priorities, members of the Traveller community may avail of both the standard housing list and also a Traveller-specific list. The Council states that membership of the Traveller community is a ground for prioritisation. In respect of standard housing, the Council states it does not operate a separate allocation scheme for Traveller applicants and due consideration is given to any household which requires an emergency allocation based on assessed need.

The Council states that it facilitates and operates an LTACC to oversee and advise on the provision of a wide range of services relating to the accommodation needs of Travellers as well as related matters. The Council states that this committee comprises six elected representatives, three Council officials as well as four Traveller representatives. The Committee meets four times a year with some meetings organised outside Áras an Chontae at a venue to facilitate Traveller representatives. The Council states that challenges have arisen over the lifetime of the last LTACC in ensuring full Traveller representation at all meetings. It states that despite efforts on its part to facilitate an improvement in representation, there is a lack of attendance on the part of the Traveller representatives with generally just one representative attending meetings.

The Council states that its Traveller Liaison Officer works closely with Traveller families and interfaces with the housing maintenance and technical teams to resolve any issues. The Traveller Liaison Officer is a member of the LTACC committee as well as other committees engaged in the provision of accommodation and other essential social services for the local Traveller community, including the TIG.

The Council states that it has an active TIG which is comprised of representatives from various social support agencies in Co. Leitrim. It is the policy of the Council to adopt an inter-agency approach in the provision of services and accommodation to Travellers. The review states that this approach is critical, particularly in relation to addressing any special needs accommodation and support requirements. The Council acknowledges that the HSE Public Health and Occupational Therapy services are central to this process. The TIG has three sub-committees: (a) Accommodation & Integration; (b)

Health & Well-being; and (c) Education & Training. The sub committees report to the quarterly TIG group meetings on progress in their particular areas.

The Council states that the housing maintenance team is available to deal with maintenance issues in relation to Traveller-specific accommodation. In relation to the 14 unit Traveller-specific group housing scheme within its functional area, the Council states that there have been issues regarding maintenance and waste over the years, with the Council having to intervene at stages with clean-ups and enforcement action. The Council states that it bears the cost of waste disposal for the 11 families currently resident in these units. The Council highlights that waste disposal is the responsibility of all other local authority tenants, including Travellers living in standard local authority housing, RAS and HAP tenancies.

The Council states that the Rosebank Traveller Development Group plays an important support role in the provision of services to Travellers. The Council further states that Leitrim Integrated Development Company's Traveller development worker also plays a significant role in liaising with Council staff on a wide range of issues, including maintenance requests, and they provide valued assistance in the delivery of Traveller accommodation services.

B. Comparison of funding to comparator group

The Council states that Tables 1 to 4 of its review set out a considerable number of projects carried out from 2015 to 2018 to address the housing needs of Travellers. However, according to the Council, for most of these projects funding came from standard housing funding sources rather than Traveller-specific accommodation funding, given the nature of the projects. In respect of those deemed to be Traveller-specific by the DHPLG, and so for which Traveller-specific funding was available, total allocation over these four years came to €498,515. The Council states that total drawdown came to €236,322. For 2019, no Traveller-specific funding was allocated or drawn down.

The Council states that from Tables 1 to 4, the total sum allocated for standard housing for the benefit of members of the Traveller community came to €768,041 and the total sum drawn down from this came to €738,428. In 2019, the total sum allocated for

standard housing for the benefit of members of the Traveller community came to €278,802. The Council states that all of this sum was drawn down.

The Council states that Table 6 of its review sets out the standard housing Acquisitions Programme 2015 -2018 (excluding units allocated to Traveller families already outlined in Tables 1 -5). According to the Council, the total sum allocated by the DHPLG over this period came to €5,110,932. The total drawdown from this was €5,044,643. Total additional local authority funding was €56,664.

In respect of revenue expenditure for Traveller-specific accommodation set out in Table 7, the Council states that the total drawdown from the DHPLG was €183,622. Total additional local authority funding added to this came to €172,119.

The Council states that Table 8 sets out revenue expenditure and funding in relation to general housing accommodation and the provision of housing services over the four-year period 2015 - 2018 (less revenue expenditure for traveller accommodation as detailed in table 7). The Council states that the total drawdown came to €14,449,293. Total additional local authority funding added to this was €1,710,280.

The Council highlights that the total drawdown for Traveller-specific accommodation from 2015-2018 was €236,322. The Council states that the total sum drawn down for standard housing for the benefit of Travellers over this period came to €738,428 and the total drawdown for standard housing, excluding that for the benefit of members of the Traveller community, was €5,044,643. The Council states that this demonstrates a ratio of spending for accommodation for Travellers to that for members of the settled community as 974,750 : 5,044,643 or 1 : 5. However, in the absence of figures for the population of each group in the functional area of the Council, no meaningful comparison can be drawn from this.

C. Adequacy of funding

Under the previous TAP 2014-2018, the Council states that it set a target of 46 units of accommodation over the five-year programme. In the period 1 January 2014 to 30 June 2019, the Council confirms that it achieved an actual output of 54 units of

accommodation, representing a 118% achievement of the original TAP 2014-2018 target.

In relation to the new TAP 2019-2024, after the first year the Council states that it has already reached 32% of the five-year target and 160% of the target for the first year of this programme.

The Council states that it has a caravan loan scheme in place and no caravan loans have been issued since 2011. The Council explains that there is no demand amongst the Leitrim Traveller Community for caravan loans. The Council asserts that Traveller group housing, standard local authority housing and long-term rental/lease accommodation (RAS, HAP, SHLI) are the preferred options of those families on their housing waiting list. The Council has one Traveller group housing scheme in Carrick-on-Shannon with 6 No services blocks and 8 family type houses. The Council states that 11 of these units are currently occupied and the Council is dealing with vacancy issues with the remaining three units.

D. Whether all funding allocated drawn down

The Council states that all funding approved by the DHPLG under the TAP in the last four years has been fully or partially drawn down by the Council. The exceptions to this, according to the Council, are projects which have been partially drawn down and the project has not been completed and works have rolled over into 2019, with the expectation of drawing down the remaining funds in 2019/20.

The Council states that there is no project where it has opted not to draw down the entirety of the funding allocated and approved. The Council explains that there may be an overlap from one year to the next where funding remains to be drawn down. Also, the Council believes that there may be works remaining to be completed.

In its letter of clarification of 05 June 2020, the Council states that in the four-year period 2015 to 2018, it has invested substantial resources and carried out extensive works relating to Traveller accommodation in the county. The Council states that the reason why all this funding is not reflected in TAP funding figures is because it has only one Traveller group housing scheme and the vast majority of Traveller families live in

standard local authority housing. The Council states that the group housing scheme was newly built in 2008 and during these years there was no major capital investment required for the scheme.

E. Any further issues of equality of opportunity

The Council draws attention to its provision of newly constructed equine facilities at Shannonside View Traveller Group Housing, Rosebank, Carrick-on-Shannon in conjunction with the Department of Agriculture, the Hungry Horse Outside Project and in consultation with surrounding local authorities.

The Council also highlights that it has a partnership with Urban Horse Project called the Pony Riding and Animal Welfare Project. The review states that this is a ten-week course which has been in existence since 2017 to train young Traveller and disadvantaged teenagers in proper equine care and practises. The Council states that transport to a local equestrian training centre is provided to the students and they are given training in horse riding and animal husbandry. Certificates are awarded upon completion of the course and an advanced course is available to those who complete the beginners' course. According to the Council, this project is part funded by the Council, Sports Ireland, Leitrim Development Company and Tusla and has been a template for surrounding counties to emulate.

The Council suggests that consideration can be given to the incorporation of an equality statement in future TAPs and relevant policies.

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 process of completing the Equality Review

There is no indication of the process pursued by the Council in undertaking this 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.

True preferences

The Council reports that in assessing the accommodation needs of local Travellers, as part of the development of the current TAP, each household was invited for a consultation interview to discuss their current and projected housing need and preferences. While the Council seemed to have a good system in place for the capture of Traveller accommodation needs through this prearranged consultation interview, the Council does not appear to have in place a robust mechanism for ensuring the accurate recording of such data. No information was provided on how members of the Traveller community were identified and contacted or how the Council ensured that all Travellers were reached. No information was provided on how many Travellers accepted the invitation to attend or on what questions they were asked or their responses. There is no further detail provided in regard to this consultation interview and how Travellers are supported to effectively engage with such processes to ensure that preferences identified are in fact true preferences. There is no independent verification process identified in relation to preferences and no tracking of these over time reported in the TAP or the Equality Review. Robust data collection and recording mechanisms are crucial for the Council to be in a position to be able to justify its policy and funding choices in respect of Traveller-specific accommodation.

The Council states that the majority of new and existing applicants for social housing expressed a preference for standard local authority housing in their assessment of need and in their housing applications with very few families expressing an interest or preference for Traveller-specific accommodation with the exception of 'a small number

of households' who wish to be accommodated on the existing Rosebank group housing scheme. From Tables 1 to 4 of the review, it seems that no new Traveller-specific accommodation projects were commenced. It was not clear what plans were made for the families who expressed a preference for Traveller-specific accommodation.

To say that it was the Council's experience that over a number of years the clearly expressed preference of the local Traveller community, and in particular new applicants for social housing support, was for standard local authority housing is a vague statement and an insufficient grounding for policy choices. The Council's observation that this was reflected in the occupancy level in the Carrick on Shannon Group Housing Scheme development, where there is little or no demand for properties as they become vacant, does not necessarily follow. Further information is required on the reasons why Travellers did not want to take up these vacancies: for example was this a true accommodation preference, or due to poor conditions on the site or due to concerns with the prospect of residing close to residents already on the site, or by reason of a desire to live near family members not living on the site?

The changing preference to standard social housing is not examined in the Council's Equality Review. It is unclear, therefore, what factors are at play in this regard. The current TAP indicates that the Council will 'consider maximising occupancy' on the Rosebank group housing site. This would appear to indicate that no new Traveller-specific accommodation is envisaged by the Council. The current TAP notes that the Mohill halting site was closed in 2014, due to issues including unfit living conditions. The families were rehoused in standard housing. These two developments could be factors in influencing the changing accommodation preferences of Travellers. This issue is something that would have benefitted from examination in the Equality Review.

The difficulties with the Council's approach were identified by the TAER, which found that recording snap-shot or historical data on existing accommodation did not equate to an accurate record of accommodation preferences. Furthermore, some members of the Traveller community perceive a lack of Traveller-specific accommodation or are exasperated by overcrowding or poor hygiene conditions on halting sites and for this reason, feel they have no choice but to apply for social housing. Accurate collecting and

recording of multiple preferences could rule out these potential underlying reasons and give the Council a more robust basis for its record of accommodation preferences. This in turn would create a more solid foundation for future Traveller-specific accommodation policies.

Available supports

The Council seems to have in place a number of support services to facilitate members of the Traveller community in accessing accommodation services. These included an active LTACC, a permanent Traveller Liaison Officer and the Traveller Interagency Group. The Equality Review advises that the Traveller Liaison Officer with the Council's housing team also sits on the LTACC. This role is the core support to Traveller tenants of the Council. There is no detail provided by the Council however, regarding the types of outcomes for Travellers engaging with this support and Travellers experiences of this support.

The important support roles of Rosebank Traveller Development Group and Leitrim Integrated Development Company's Traveller development worker are also noteworthy.

The Council reports that currently there are four Traveller representatives on their LTACC. It was of concern however that there was lack of attendance on the part of the Traveller representatives of the LTACC with generally just one representative attending meetings. The Council has made efforts to improve this situation, but these have not been successful. The Equality Review has provided no reasons for this and no further detail in regard to what barriers have been identified that are impeding this representation and what process was employed to attempt to address the situation. The Council notes that they have held LTACC meetings outside of the Council offices, at a venue to facilitate Traveller representatives to attend.

In addition, there is no detail provided regarding the process by which Traveller representatives are appointed onto the LTACC or the process for them to have accountability back to the wider local Traveller community or the supports provided to enable an effective participation.

It is noted that the housing maintenance team are available to deal with maintenance issues in relation to Traveller-specific accommodation. The current TAP does not identify a role for tenants in the maintenance and operation of Traveller-specific accommodation. The Council however states that in its group housing scheme, there have been issues regarding maintenance and waste over the years, with the Council having to intervene at stages with clean-ups and enforcement action. The Council states that it bears the cost of waste disposal for the 11 families currently resident in these units and highlights that on the contrary waste disposal is the responsibility of all other local authority tenants, including Travellers living in standard local authority housing, RAS and HAP tenancies. Other than a reference to the Traveller Liaison Officer acting as an intermediary between Traveller tenants and the Council's maintenance team, the Equality Review provides no further detail on specific initiatives/processes and outcomes from these, to address these issues with tenants and to enable Traveller participation in estate management. The Council also does not include information on what steps it has taken to consult with the residents of the group housing scheme on this issue. One solution could be that if this service is provided by the Council, there could be a notional rent or service charge payable by these residents. Consultation on such issues is crucial and the services of the Traveller Liaison Officer and the LTACC could be deployed here.

Travellers' experience of homelessness

Neither the Equality Review nor the TAP indicate whether there are Traveller households currently in emergency homeless accommodation in Leitrim, aside from the current TAP noting that there are no Traveller families living in unauthorised sites/roadside in the administrative area.

Funding and drawdown of funding

The financial data provided by the Council indicate that the majority of expenditure on accommodation for Traveller households was in regard to the acquisition of standard housing units and for the upgrade of units from the Council's housing stock under its 'Void Scheme', which were then allocated to Traveller families. This type of expenditure falls outside of the TAP allocation.

There was a significant under-spend on Traveller-specific accommodation from 2015 to 2018 and no expenditure at all in 2019. The Council provided disaggregated data on spending on standard housing as between that for the benefit of Travellers and that for the benefit of members of the settled community. In both cases there was either a partial underspend or the full sum allocated was drawn down.

Total drawdown for Traveller-specific accommodation from 2015-2018 was €236,322. The total sum drawdown for standard housing for the benefit of Travellers over this period came to €738,428 and the total drawdown for standard housing excluding that for the benefit of members of the Traveller community was €5,044,643. This demonstrates a ratio of spending for accommodation for Travellers to that for members of the settled community as 1 : 5. In the absence of figures for the population of each group in the functional area of the Council, no meaningful comparison can be drawn from this.

During the 2015-2019 period, it would appear that the only expenditure relating to Traveller-specific accommodation was the funding sought for the refurbishment of a unit at the Tawlaughtmore, Mohill site. In 2016, the Council was allocated €88,875, of the projected €270,000 budget, for this refurbishment, however, there was no drawdown until 2018, and the works were continued into 2019. The Equality Review provides indication of the reasons for this delay but does not provide any specific details.

The Council states that all funding approved by the DHPLG under the TAP in the last four years was fully or partially drawn down. Where partially drawn down, this was because the project had not been completed and the work had rolled over into the subsequent year.

Targets

No new Traveller-specific accommodation was planned in the TAP 2014-2018. In respect of the provision of standard accommodation for members of the Traveller community, the Council states that it achieved 118% of its TAP 2014-2018 target (target of 46 units versus achieved output of 54 units). The current TAP indicates that of these 54 achieved outputs, the accommodation provided was as follows: 20 in

standard local authority housing; 13 through RAS; 7 through HAP; 7 in the group housing/halting site; 4 in standard housing AHBs; 2 in long-term leasing; 1 through mobility grants. In relation to the new TAP 2019-2024, after the first year the Council states that it has already reached 32% of the five-year target and 160% of the target for the first year of this programme.

It is noted that the Council suggests that consideration could be given to the incorporation of an equality statement in future TAPs and relevant policies.

Traveller culture and ethnicity

It is of concern that consideration does not appear to have been given to addressing issues of cultural difference and any specific needs that might arise in this regard in the provision of standard housing. There is no reference to initiatives to support and sustain the development of integrated diverse communities on social housing estates. The current TAP references an inter-agency approach that was adopted to address the accommodation needs of Traveller families on the Mohill halting site and facilitating their successful transition from the site to standard local authority housing. It would have been useful if further details had been provided.

Further notable aspects of the review were the Council's provision of newly constructed equine facilities at Shannonside View Traveller Group Housing, Rosebank, Carrick-on-Shannon in conjunction with the Dept. of Agriculture, the Hungry Horse Outside Project, and in consultation with surrounding local authorities.

The Equality Review also refers to the Partnership in Urban Horse Project - Pony Riding and Animal Welfare Project, which the Council notes has provided a template for surrounding counties to emulate.

Transient sites

With regard to transient accommodation, the Council's current TAP indicates an openness to such provision, noting that:

“facilities for visitors to tenants of permanent Traveller-specific accommodation have been provided by Leitrim County Council”

and that:

“consideration will also be given to reassigning existing service block facilities to provide transient facilities should service blocks become vacant during the course of this programme and not be required to meet identified Traveller accommodation needs”.

The Council notes that transient provision should ideally be provided regionally and in conjunction with adjoining local authorities.

The private rented sector

The Equality Review does not address issues in relation to Travellers' access to private rented accommodation, despite there being a high number of Travellers accessing HAP/RAS/rent supplement supports: 21 of the 75 Traveller households in the functional area; and 20 of the 54 targets achieved for the previous TAP. The current TAP notes that provision to reach the proposed targets to 2024 will mainly be through standard local authority housing and RAS and HAP. Considering the well documented experiences of discrimination among Travellers accessing private rented accommodation and issues of shortages in provision and related issues of cost, it is of concern that these issues are not given some consideration in the Council's Equality Review.

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.

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:
 - 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;
 - 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;
 - establishing appropriate processes for Traveller participation in estate management on Traveller-specific accommodation;
 - responding to the practical implications of Traveller ethnicity, in the provision of standard housing, in particular for supporting and sustaining integrated diverse communities;
 - 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 imperative of an informed and empowered participation by Travellers on the LTACC through capacity-building or support for local Traveller organisations to emerge and play a role and in turn feeding into the report recommended at point 6) below; 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 draft a report on the reasons why there was poor attendance on the part of Traveller members of the LTACC and, if necessary, possible steps that could be taken to ensure that this committee operates as a truly consultative body, in which all opinions are heard and given weight. Any such steps taken by the Council should be published.
5. Record data on both funds allocated and drawn down for Traveller-specific accommodation and those for general accommodation. This would help to inform the Council to ensure that there is no less favourable treatment of Travellers in the provision of accommodation. Account may be taken of the true preferences of members of the Traveller community whose accommodation needs are met through general housing funds and of the fact that some forms of accommodation are more expensive than others.
6. 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 into the reasons for this and follow any recommendations made.
7. 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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an Duine agus Comhionannas
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