

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



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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 Monaghan 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 27 September 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 Equality Review states that the Council's TAP sets out annual targets and that the programme is reviewed annually. The Council states that it carries out an assessment of need annually and the accommodation needs of Traveller families are part of this assessment and include their preferences (standard social housing, private rented, Traveller-specific accommodation), which informs the TAP.

The Council states that in accordance with S. 6(6) of the *Equal Status Acts 2000-2018*, Travellers are treated differently in that:

“they avail of a specific Traveller Accommodation Programme with funding ring-fenced on an annual basis”.

The Council states that Travellers can avail of both standard and Traveller-specific housing. The Council states that housing legislation, 1966 to 2014, applies to Travellers in respect to eligibility for social housing supports and allocations. The Council states that it employs a Housing Officer who undertakes assessments for social housing support and allocations.

The Council reports that its LTACC is composed of five Traveller representatives, four Councillors and two Council officials and that there is an equal gender balance. It states that the committee have meetings every quarter and the meetings provide a forum for participation and consultation regarding Traveller accommodation. The Council reports that the LTACC liaises with local agencies who represent Travellers, for example Teach Na Daoine Family Resource Centre and Monaghan Integrated Development.

The Council states that there is ongoing individual contact with Travellers by housing officials in respect to their accommodation needs where required.

The Council reports that it employs a full time Social Worker who, as part of their duties, provides support to Travellers in relation to their accommodation needs and so that they can access mainstream services. The Council reports that internal housing

meetings are held to review individual Traveller cases with acute/urgent accommodation needs (for example, SEO, Housing Officer, Social Worker and technical staff meetings).

The Council states that it provides 'ongoing management and maintenance of its Traveller specific housing also the management and maintenance of an onsite community building, waste removal[,] grass cutting and general upkeep'. The Council states that it employs a full time Caretaker for its Traveller-specific accommodation.

In terms of projecting need, in correspondence received on 05 June 2020 the Council states that, as members of the LTACC, its staff review the appropriateness of the TAP strategy and provide an annual update on the Traveller accommodation needs assessment. It states that this exercise reviews the figures included in the document and addresses whether the numbers, form and type of accommodation being provided is satisfactory to meet current needs. The Council states that, subject to agreement, a review action programme with projects to be agreed is inserted as an addendum to the TAP and that any delays and reasons for the delays will be highlighted in the review.

In the body of the TAP 2019-2024, the Council states that projected need is based on the difference in the number of families in the county in 2014, at the time of the last TAP, which was 155 and the number assessed for this TAP, namely that there are now 176 families in the county, meaning an increase of 21 families since the last programme.

In terms of internal TAP monitoring, the Council states that an individual Case Officer (Technical Section) is tasked with progressing projects identified in the TAP and that that officer reports directly to the SE Engineer (Housing). It states that the Housing Management Team reviews capital projects in the TAP on a monthly basis to monitor progress. It states that the Housing SE Engineer is the direct contact for the DHPLG during project approval stages.

B. Comparison of funding to comparator group

The Council states that the most recent CSO data records 271 Travellers residing in the Council's functional area. The Council reports that in the 2011 Census, this was recorded as 255. The entire population of the county was recorded as 60,483 in the

2011 Census. The final appendix to the Council's review is entitled 'Annual estimate of Traveller families in Monaghan 2018'. The Council states that in 2018, it was estimated that there were 171 Traveller families residing in Monaghan, of which it states:

"102 are tenants of Monaghan County Council between standard social housing, one off purchases and the halting site".

The Council outlines, in Table 1a of the Equality Review, the annual capital expenditure for Traveller accommodation from 2015 to 2018. It is reported that the total 'sum of purchase price' for this entire period came to €1,511,215 and that the total sum for improvement works came to €366,892. This amounted to a total of €1,878,107. For 2019, it is reported that there was a total allocation of €214,009 for the pilot project upgrade on Gortakeegan site. The Council reported that none of these funds had yet been drawn down as of September 2019.

The Council reports that the DHPLG allocated 75% of spending, which was *circa* €65,000 per annum. In respect of an annual expenditure for Traveller accommodation from 2015 to 2018, the Council states that there was an allocation of €29,714 for upgrade of electrics in Traveller-specific accommodation in 2016, however the Council did not report whether this was drawn down. Total current cost for this period was set out as €317,424, however the Council did not report in the review as to whether this was a budgeted cost only, a sum allocated or total sum drawn down.

Over the period from 2015 to 2019, the Council reports that its total expenditure on capital construction projects and house purchases was €45,729,845. The Council states that there was no yearly allocation to capital projects, but that the recoupment matched the amount approved.

The Council states that it will continue to record all accommodation provided for Traveller families, especially the families provided with accommodation from funding that is not ring-fenced for Traveller-specific housing. It states that in its functional area, Traveller-specific accommodation is not what Traveller families are requesting.

The Council states that in its assessment of need, Traveller families are not seeking Traveller-specific accommodation which requires the drawdown of Traveller-specific

funding. The Council states that the failure to drawdown Traveller-specific funds does not mean that it is not responding to the needs of Traveller families in Monaghan.

C. Adequacy of funding

In the 2014-2018 TAP the Council's stated target was to deliver social housing support to 44 Traveller families.¹ The Council states that it in fact delivered social housing support to 57 Traveller families.

In the functional area of the Council, it is reported that 102 Traveller families are accommodated in social housing. The Council reports that it provides planned and responsive maintenance for all social housing stock.

In the 2014-2018 TAP, the Council reports that it exceeded targets set for the delivery of accommodation but did not draw down Traveller-specific funding as the assessment of need for that TAP did not identify any requirement for Traveller-specific accommodation.

The findings of the Council's assessment of needs (under S.6 of the 1998 Act) are detailed in its TAP 2019-2024. The Council states that no Traveller families at the time of assessment were seeking Traveller-specific accommodation.

D. Whether all funding allocated drawn down

In its Equality Review, the Council states that it was in the process of upgrading the Traveller-specific accommodation at Gortakeegan. It states that it was due to complete the pilot part of this project by the end of 2019 and intended to seek funding at that time.

The Council reports that Gortakeegan was a capital project that progressed under the 2009-2013 TAP and that it is now part of the 2019-2024 TAP for the addition of bedrooms. The Council states that it has made adaptations to its own stock during each TAP to deal with overcrowding and/or specific needs arising from disability.

¹ Stated to be 47 families in the body of the TAP 2019-2024.

The Council states that its internal TAP monitoring process is demonstrated in the current capital project involving the upgrade of the Traveller-specific accommodation at Gortakeegan halting site. In correspondence received on 05 June 2020 it states the following in this regard:

“The need for larger units on the existing halting site was identified through the LTACC and a review of the household makeup of the current occupants on the site. A Pilot Project was initiated which consisted of converting 4 welfare units into 3 dwellings providing one and two-bedroom accommodation. These were completed in December 2019”;

“The residents’ feedback was quite positive on the redevelopment of the units and reported back to the LTACC. Further redevelopment of the remaining 11 welfare units was recommended by the LTACC”;

“To progress Capital Projects of this type requires the Council to follow a four-stage process to secure funding from the DHPLG for works”;

“Tendering documents are being prepared to convert the remaining 16 welfare units into 11 dwellings. These works will be undertaken over two phases with an estimated cost of €200,000 for Phase 1 and €600,000 for Phase 2. Works were expected to commence in Quarter 3 of 2020 and full site completion in 2021”;

and

“Project review and monitoring will continue by the Housing Management Team and the LTACC”.

E. Any further issues of equality of opportunity

The Council states that it was a lead pilot local authority for the implementation of the Public Sector Duty in 2017/2018 on behalf of the LGMA. The Council identified the need to continue to ensure the promotion of equality and elimination of discrimination across its services and functions. The Council states that the approach within the local authority, given the resources available, is to take a broad and consistent approach to the elimination of discrimination and promotion of equality for all its service users. It states that this approach encompasses the needs of people with a disability, older people, migrants and members of the Traveller community. It states that the approach

of the Council is to meet the needs of the community in its functional area as identified in a variety of public consultation exercises.

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.

Accommodation needs and true preferences

The Council does not give sufficient information to be able to identify a robust system to capture and record true Traveller accommodation preferences. The Council does highlight the key role of the LTACC, but this representative body cannot know the true accommodation preferences of all members of the Traveller community. The Council states that projected need was based on the difference in the number of families in the county in 2014 at the time of the last TAP (which was 155) and the number assessed for this TAP (176), amounting to an increase of 21 families since the last programme. This, however, does not give any indication of how the accommodation preferences of these families are collected or recorded.

The TAER 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.

The current TAP advises that of the 47 families identified as in need of social housing supports, all have indicated a preference for standard housing. While the overwhelming preference for standard housing may be a true preference, it is also the case that the

Council appears to have reduced its targets and ambition for provision of Traveller-specific accommodation and that this could be an influencing factor on preferences. The current TAP, for example, advises that the Council's sole halting site will be reduced from a 20 unit site to a 13 unit site, over the lifetime of the TAP. It is also the case that while 6 Traveller families expressed a preference for group housing, for the TAP 2009-2013, none of these preferences were met in the programme outputs.

Neither the Equality Review nor the current TAP provide information on the process for undertaking the assessment of accommodation need in preparing the TAP. There is no detail provided in regard to whether and how Travellers are supported to effectively engage with the process 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.

The Council identifies overcrowding as an issue, yet no need for more Traveller-specific accommodation was identified in the TAP 2014-2018, nor in the more recent TAP 2019-2024. This is suggestive of a gap in the capturing of accommodation needs by the Council.

Engagement and consultation with the Traveller community

The further information supplied by the Council notes that:

“through direct engagement with Travellers in the community and also through liaison with regional and national Traveller organisations [the Council] ensure[s] that the needs, challenges and barriers experienced by Travellers are considered, reflected and accommodated within [its] policies, initiatives and practices”.

There is no detail provided, however, as to: how this process of consultation is undertaken and by whom; what the ‘needs, barriers and challenges’ are, that have been identified; and how these issues are addressed by the Council within its policies, initiatives, and practices.

The Council reports that, as of September 2019, there were five Traveller representatives on its LTACC. The current TAP advises that the Council:

“will liaise with statutory and voluntary bodies to develop and deliver appropriate training and support to enable meaningful participation by the Traveller representatives on the committee”.

This process, however, is not referenced in the Equality Review and 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.

Neither the current TAP nor the Equality Review identify whether there is any process in place to enable Traveller participation in estate management on the Council's halting site.

Support Services provided

A number of supports are reported as being available to members of the Traveller community to assist them in accessing accommodation services. The Equality Review advises that the Council employs a Social Worker and a Housing Officer to liaise with all tenants, including Travellers. It also states that a full time Caretaker is employed for the Council's Traveller-specific accommodation and that there is ongoing individual contact with Travellers by housing officials concerning their accommodation needs where required. The Equality Review, however, does not offer any further detail in regard to: whether, and how these general supports take account of the specific situation, experience and identity of Travellers and their specific needs; and particular outcomes for, and experiences of Travellers accessing these supports.

Monitoring progress

It is noted that the Council states that it has in place a system for monitoring the progress of capital projects set out in the TAP. The Council provided the current capital project involving the upgrade of the Traveller-specific accommodation at Gortakeegan halting site as an example of this system. The process as outlined by the Council suggests that there was communication between the residents of this site and the

LTACC, and between the LTACC and the Council. The Council records that there was 'quite positive feedback' from the residents in respect of the initial phase of this project, namely the conversion of 4 welfare units into 3 dwellings providing one and two-bedroom accommodation.

Data provided in respect of drawdown and spending

The financial data provided by the Council were not clear. In Table 1a of the Equality Review: Annual Capital Expenditure - Traveller Accommodation 2015-2018, the Council indicates a total expenditure of €1,878,107. The Council states that no Traveller-specific accommodation projects were planned in the TAP for that period and that in its assessment of need, Traveller families were not seeking Traveller-specific accommodation. This suggests that the figures provided in Table 1a relate to general social housing allocated to Travellers. However, it is not then clear whether the figures, provided in the letter of clarification dated 05 June 2020, for general housing relate to all general housing (including that allocated to members of the Traveller community) or only to general housing assigned to members of the population of Monaghan other than members of the Traveller community. For this reason, it was not possible to make a meaningful comparison between expenditure on Traveller-specific accommodation and expenditure on general housing.

Table 2 of the Equality Review, refers to revenue expenditure on Traveller accommodation, from 2015 to 2018. These data were also unclear. The Council gives a figure of '*circa*' €650,000 budgeted costs per annum, for maintenance costs, caretaker salary, insurance, light and heat. Regarding 2015, the table indicates, in the 'Allocation from Department' column, '75% of spending': there is no indication of drawdown (per year) however, nor is it indicated whether the reference to '75% of spending' applies to the subsequent three years. In addition to this yearly cost, the Council indicates additional budgeted costs of: €29,714 in 2016 (for electrical upgrade to Traveller-specific accommodation); €24,413 in 2017 (for upgrade of Traveller-specific accommodation); and €3,296 in 2018. The table indicates a Departmental allocation in respect of the 2016 upgrade, but no indication of drawdown in respect of this amount. In addition, there is no data provided regarding Departmental allocation or drawdown in

respect of the remaining budgeted costs. The additional information supplied by the Council does not provide any further clarity on the above.

Targets

It is noted that the Council exceeded its targets for the provision of accommodation to Travellers in its TAP 2014-2018. It assessed the number of families in need of accommodation at 47 and in fact delivered social housing support to 57 families throughout that period.

TAP 2019–2024

The Council's current TAP 2019-2024, is framed in terms that could be restrictive. The policy statement advises of four categories of Traveller applicants that will be considered for social housing supports. These include new Traveller families who move into County Monaghan during the period of this plan and who must:

“satisfy Monaghan Local Authorities that they qualify for and demonstrate that they have a genuine need to be accommodated in the area”.

There is no detail provided, in the TAP or the Equality Review, as to what assessment is applied to determine if this condition is satisfied. It would be important that the Council ensures that the application of this provision is not discriminatory and is not at odds with provisions in relation to local connection requirements for the general population under the 2011 Assessment Regulations.

The current TAP lists the types of accommodation that will be considered for Traveller applicants: the only reference to Traveller-specific accommodation listed is halting site provision and there is no reference to the possibility of group housing provision. The TAP does not reference any consideration of the need for transient accommodation provision in the administrative area, despite a requirement to do so under the 1998 Act. There is no reference to loans for the purchase of caravans.

The private rented sector

The Equality Review does not address issues in relation to the access of Travellers to private rented accommodation, despite there being a high number of Travellers

accessing HAP supports: 22 units of the overall 57 units target achieved for the 2014-2018 TAP. The current TAP notes that provision to reach the proposed targets to 2024 will mainly be through standard local authority housing 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 Equality Review of the Council.

Travellers' experience of homelessness

There is no reference to homelessness and whether this is an issue for Travellers, which might have been expected given the high rates of homelessness identified nationally for Travellers.

Traveller ethnicity and culture

The TAP does not include any reference to the Council's recognition of Travellers as a distinct ethnic group with specific needs, including accommodation needs, arising from this diversity.

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 Public Sector Equality and Human Rights Duty

There is no reference to the statutory obligations of the Council under S.42 of the 2014 Act: the Public Sector Equality and Human Rights Duty, in the current TAP or the Equality Review. In the further information submitted by the Council, the Council notes that, in 2017/2018, it was a lead pilot local authority for the implementation of the Public Sector Equality and Human Rights Duty, on behalf of the LGMA and in conjunction with the Commission. It refers to a 'variety of public consultation exercises' in respect of the implementation of the Public Sector Duty, but gives no details of any particular consultation process in respect of members of the Traveller community.

There is further no detail provided in regard to any specific steps relating to the Duty in the Council's development and implementation of its TAP.

It is noted that the Council's stated approach to the elimination of discrimination and promotion of equality for all its service users is one which is 'broad and consistent' and 'encompasses the needs of People with a disability, Older people, Migrants and Members of 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:

- presenting data and information 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;
- acknowledging the Council's recognition of Travellers as a distinct ethnic group and the specific accommodation needs that arise from this in its TAP;
- specifying in its TAP, the Council's qualifying conditions for approval for social housing supports for new Traveller families to the area, and ensuring there is no discrimination when these requirements are compared to the requirements on the wider community;
- tracking over time and independently verify 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 structures, processes, and supports 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 address the issues identified;

- establishing the level of Traveller homelessness, their specific experience of homelessness, and particular needs that might need to be taken into account in homelessness services;
 - establishing and developing a response to the needs of Travellers who are nomadic within and through the county through the provision of transient halting site bays;
 - 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
 - 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. Consider the possibility of employing a Traveller Liaison Officer, who should have a drop-in or phone clinic by which members of the Traveller community can voice any concerns they may have in respect of their accommodation directly.

The officer could also assist with online applications where members of the Traveller community have no access to the internet. The officer should have regular meetings with members of the Council mandated with housing issues to ensure regular feedback on accommodation issues raised by members of the Traveller community.

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.
7. Ensure that all staff receive training on its Public Sector Duty 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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