

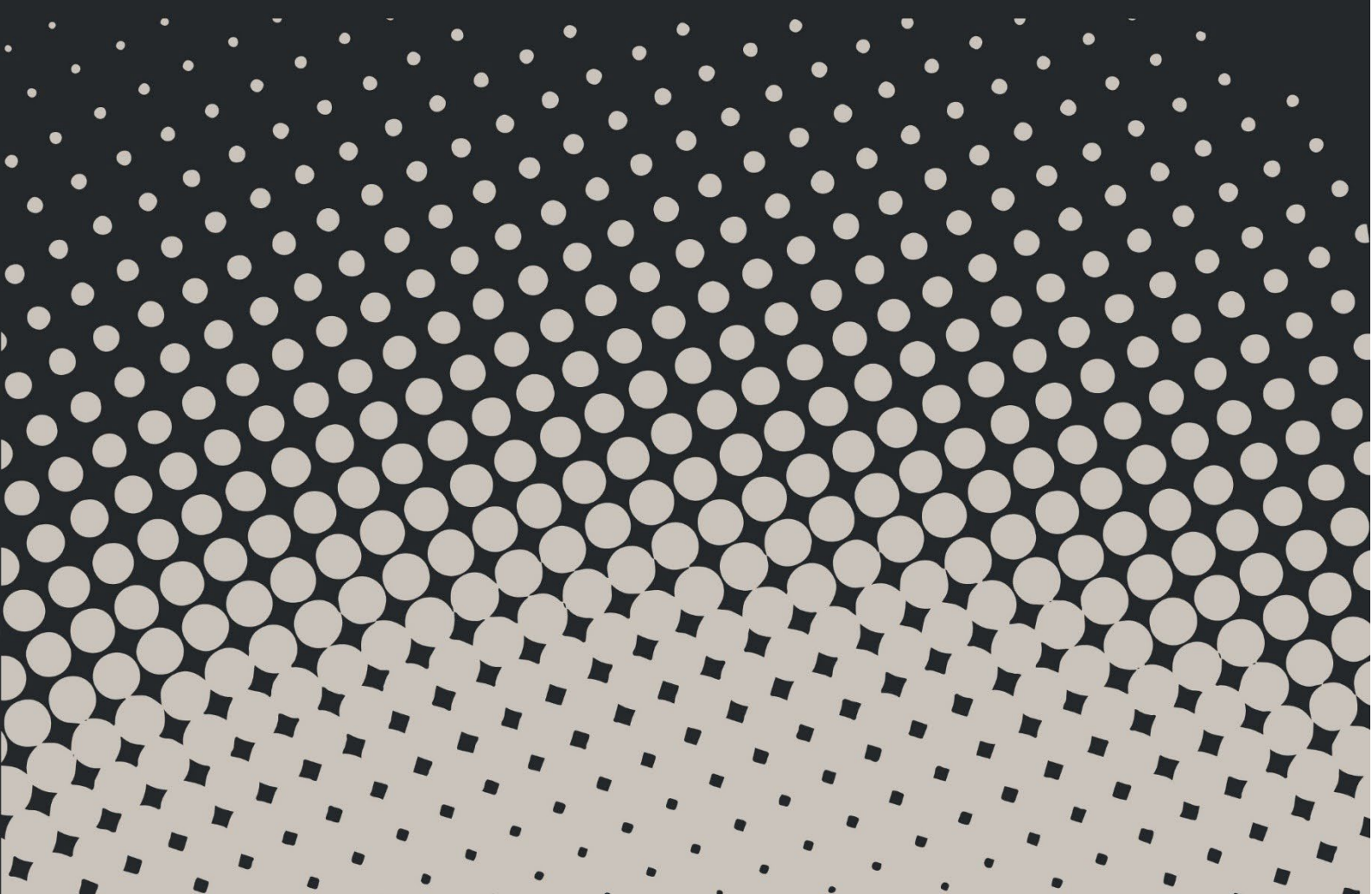


Coimisiún na hÉireann um Chearta
an Duine agus Comhionannas
Irish Human Rights and Equality Commission

An Account of the Equality Action Plan prepared by Cork City Council in respect of Traveller specific accommodation

Irish Human Rights and Equality Commission

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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.

Contents

Glossary.....2

Introduction3

Summary of Actions identified in the Equality Action Plan4

Recommendations.....20

Conclusion30

Appendix 131

Glossary

2014 Act:	Irish Human Rights and Equality Act 2014
AHB:	Approved Housing Body
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
Cena:	The Traveller-led Voluntary Accommodation Association (TVAA)
DHPLG:	Department of Housing, Planning and Local Government, known as the Department of Housing, Local Government and Heritage (DHLGH) since 30 September 2020
ESA:	Equal Status Acts 2000 - 2018
HAP:	Housing Assistance Payment
LTACC:	Local Traveller Accommodation Consultative Committee
NTACC:	National Traveller Accommodation Consultative Committee
PSEHRD:	Public Sector Equality and Human Rights Duty
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
TAO:	Traveller Accommodation Officer
TAP:	Traveller Accommodation Program
TAU:	Traveller Accommodation Unit

Introduction

In June 2019, Cork City Council (the ‘Council’) was invited to prepare an Equality Review with respect of Traveller accommodation and services, and this was submitted to the Commission in August 2019. The Commission’s account of the Council’s Equality Review was published here as part of the Commission’s 2020 Annual Report.

Under section 32(1)(b) of the Irish Human Rights and Equality Commission Act 2014 (the ‘2014 Act’), the Commission may invite a particular undertaking to prepare and implement an Equality Action Plan.

In November 2022, the Commission invited the Council to prepare an Equality Action Plan (the ‘Plan’) to further the promotion of equality of opportunity regarding the access to and provision of Traveller-specific accommodation, including specified and time-bound actions regarding practices, procedures, and policies that relate to the drawdown of capital funding and the provision of Traveller-specific accommodation services to Travellers in the functional area of the Council.

The Council was invited to prepare a Plan with identified objectives that were specific, measurable, attainable, relevant and time-based. The Council was invited to prepare a Plan that identified the person responsible for ensuring that the objectives are achieved and that included arrangements for monitoring and review. The invitation referenced the importance of consultation with Travellers, their representative groups and other stakeholders in the preparation, implementation and communication of the Plan in order to ensure that the preparation and implementation of the Plan was achievable and could deliver real results for the affected community.

In preparing and implementing any Plan, the Commission requested that the Council address and report on a number of specific issues. (See Appendix 1).

The Council submitted its Plan response to the Commission in June 2023. This is the Commission’s account of the Council’s Plan that, pursuant to section 28(2) of the 2014 Act, is being published as part of the Commission’s 2024 Annual Report.

Summary of Actions identified in the Equality Action Plan

The Plan is structured by reference to various headings which identify the core issues addressed in each section. Under each heading, the Plan first details the outcome of the consultation undertaken in the preparation of the Plan with reference to each issue, and then sets out the actions taken and planned by the Council. This account will follow that format to comment on the issues identified and the corresponding actions outlined in the Plan.

Improvement in accuracy of annual count/census of Traveller accommodation need

In respect of improving the accuracy of the count, in summary, the Plan identified the following issues from consultation with stakeholders:

- › that the existing method used for the annual census/count should be revised to address a concern that there is an under counting of the number of Travellers living in the Council's functional area;
- › that it is increasingly difficult to plan for and provide sufficient Traveller specific housing options without accurate data;
- › that there are several issues that impact the uptake and accuracy of the Traveller count/census, including: digital and literacy barriers, and the absence of culturally appropriate configurations of data gathering instruments;
- › that Travellers and their representatives had a strong interest in participating in peer researcher training for the census;
- › that Council offices as a location for census taking may not be suitable, and a neutral and accessible space for peer researchers to facilitate data recording for the census might be more acceptable;
- › that the current census form does not currently capture relevant information regarding multiple accommodation preferences, and that it should be revised to improve the format, accessibility and administration of data gathering so that the data is culturally appropriate and meaningfully reflects the preferences of Travellers within the Council's functional area;

- › that the existing census compilation method does not fully capture relevant information regarding new family formations and other demographic indicators and that this needs to be reflected in the planning, design, delivery and ongoing management so that forward planning can be undertaken based on an accurate evidence base; and
- › that the information gathered must be comprehensive and robust so it can form a meaningful evidence base to inform policy.

The Plan then sets out actions to address the concerns as identified above, including:

- › a review of existing methods used for the count/census, including a review of the methods of data gathering and the making of recommendations to the DHLGH to ensure the count/census accurately captures multiple accommodation preferences of the Traveller community;
- › identification of best practice in the field in relation to inclusive methodologies for census/data gathering;
- › engagement, through an inclusive and culturally appropriate process, with members of the Traveller community, Traveller advocacy and representative groups (local and national) and other relevant stakeholders to ensure the count methodology is robust and inclusive, and ensures accurate counting of Travellers living across different tenures within the Council's functional area;
- › commencement of a thorough review of existing data gathering instruments, and a comprehensive revision and re-design of the content and form of the count/census instrument, in collaboration with the Traveller community, and where necessary in consultation with experts in inclusive research methodologies;
- › liaising with University College Cork Department of Adult Continuing Education and the EU UNIC Traveller inclusion programme to put in place a Traveller Census training module to upskill and train researchers in research methods;
- › action to ensure that definitions of accommodation preferences are Traveller-led and expressed in a culturally appropriate form addressing literacy and accessibility concerns;
- › a revision of the census process to take account of additional and relevant information from local and national sources that could impact on accommodation planning and delivery, including family formations, marriage rates, birth rates,

household structure, age profile, morbidity and mortality rates, health indicators, and other relevant demographic indicators;

- › development of processes for improving the quality of information from the count/census, which will directly inform policy on Traveller accommodation provision; and
- › actions to ensure the information management infrastructure will facilitate effective data analysis to enable short-, medium- and long-term accommodation planning, policy, and provision.

Accuracy and completeness of the TAP

In summary, the Plan identified the following issues under this heading from consultation with stakeholders:

- › that, with reference to previous consultations on the TAP, the information gathered for the TAP does not include a breakdown by accommodation type or current accommodation status of Travellers;
- › that the Council has an awareness of the accommodation needs and preferences of Travellers, but that this is based on data which is not sufficiently comprehensive or robust;
- › that the Council utilises available data as effectively as possible, but more reliable evidence base would reflect the accommodation needs and preferences of Travellers more accurately;
- › that the TAP needs to be informed by a reliable and robust evidence base to ensure it is fit for purpose to meet those needs and preferences and to inform how those will be met; and
- › that the current TAP targets have not been impacted by the number of additional families housed within Traveller specific housing or by other means, and that they are based on a timeframe rather than a number of units/standard housing delivery.

The Plan then sets out that it will do the following to address the accuracy and completeness of the TAP, including:

- › compile more accurate and comprehensive information to determine the current accommodation status of Travellers, to include a breakdown of accommodation

type of the current accommodation status of Travellers in the Council's functional area;

- › ensure that relevant data on the needs and preferences will be collated and is accurate, robust and utilised to inform the Council's TAP, and that the TAP is informed by such reliable data collated from a comprehensive Traveller census;
- › ensure that the roles, responsibilities and reporting processes arising from the delivery of the TAP will be assigned to relevant stakeholders; and
- › ensure that future TAP reviews include a defined process for the TAP targets impacted by the number of additional families housed within Traveller-specific housing, or other means.

Traveller participation in estate management

The Plan does not address this issue under a discrete heading. Feedback and relevant actions on estate management are detailed under below heading that covers, more broadly, actions relating to Traveller ethnicity, provision of housing services, and sustaining integrated and diverse communities.

Promoting the practical implications of Traveller ethnicity, respect for Traveller culture and identity in provision of housing services, and sustaining diverse and integrated communities

In summary, the Plan identifies the following feedback from consultation with stakeholders:

- › that horse-ownership is recognised as a significant cultural practice for the Traveller community and there is a desire in the community for a dedicated horse project;
- › that horse-ownership is recognised by the Council as a priority for the community;
- › that there is a strong affinity with animal ownership on a wider level, and that the Council's Social Inclusion Unit has adopted a holistic approach to animal ownership, including provision of a series of animal welfare days/clinics on halting sites around the city, which have been met with a high degree of satisfaction from the Traveller community;

- › that the Traveller community place importance on family cohesion and connection with extended family, but that the Council faces challenges translating this into practice and has not yet fully responded to this need;
- › that the Council's progress to date in promoting cultural and other needs of the Traveller community is acknowledged and that the Council is committed to responding to the wider needs of the Traveller community through interventions such as roll out of Traveller Cultural Awareness Training ('TCAT') to Council staff and by utilising the Traveller Interagency Services Group ('TIG') and its working group;
- › that fostering positive community relations between Travellers and non-Traveller communities is important in order to break down barriers, address misconceptions, and build trust and interactions based on mutual respect;
- › that the Council is currently responsible for estate management whereby Council representatives periodically travel to sites to hold meetings to gather information and address any issues, and that while these meetings see positive levels of interaction, they focus on immediate issues rather than on progress being made, and they do not extend to crisis meetings for severe weather warnings, floods and environmental events; and
- › that Cena, the Approved Housing Body, has been providing specialist advice and training in inclusive, culturally appropriate estate management for Traveller sites, and that examples of good practice locally and nationally have been identified.

The Plan then sets out actions to address the concerns as identified above, including:

- › continued roll out of successful animal welfare initiative to promote responsible animal ownership, including horse ownership;
- › maintaining engagement with relevant parties in its commitment to the provision of land for horse grazing and care as part of an equine trial project, supported by the Council and potentially managed in partnership with the Traveller community;
- › development of strategies and practices in agreement with the Traveller community to support family cohesion by providing housing that promotes connection with extended family;
- › analysis of relevant data on family formation trends and Traveller preferences in terms of location and type to support and sustain family cohesion and connections;

- › continuation of dedicated TCAT for Council staff to embed understanding and foster respect for Traveller culture, including creation of measureable actions / indicators as part of this action and provider refresher training in a structured manner;
- › continued support of the work of the TIG and to report on how Traveller culture is promoted and fostered in tangible and measurable ways;
- › provision of training on unconscious bias and on equality and diversity for all staff, and provision of refresher training in a structured manner;
- › continued engagement with the TIG to promote positive relations between Traveller and non-Traveller communities, including extending the membership of the Group where this contributes to delivery of the Plan;
- › promotion of actions and projects to promote inter-community relations including employment, education and skills, youth services, and training in leadership, media and visibility;
- › continued promotion of a cultural of positive engagement between the Traveller and non-Traveller community through the TIG programme of activities;
- › development of estate management options appropriate to the needs of Travellers through engaging with community and representative groups;
- › exploring the scope for members of the Traveller community to be provided with training to take on paid estate management/caretaker roles;
- › development and implementation of a procedure for crisis warnings and updates in responding to extreme weather with specific reference to the impacts on the Traveller community; and
- › maintaining engagement with Cena in relation to inclusive estate management, with reference to upskilling, training and employment opportunities for members of the Traveller community.

Provision of appropriate and accessible homeless services

In respect of provision of appropriate and accessible homeless services, in summary, the Plan identified the following feedback from consultation with stakeholders:

- › that the Council provides general support for people at risk of, or experiencing homelessness, including digital and literacy supports, but that there is no Traveller specific support available;

- › that some members of the community and their advocates reported that there is not adequate follow up by the Council with Travellers who are registered as homeless and that Traveller ethnicity is used directly and indirectly to limit opportunities to accessing private rental accommodation through the HAP scheme; and
- › that there is no current co-ordination or alignment of any actions or plans regarding homeless accommodation provision to Travellers with national bodies.

The Plan then sets out actions to address the issues as identified above, including:

- › development of practices to provide specific supports for members of the Traveller community who are at risk of, or experiencing, homelessness;
- › actions to ensure that engagement with the private rental sector via the HAP scheme is fully in compliance with equality legislation; and
- › coordination and alignment of homeless accommodation provision to members of the Traveller community with any relevant national bodies and to avail of best practice examples and relevant supports including research and finance.

Provision of transient halting sites

In respect of the issue of transient halting sites, in summary, the Plan identified the following feedback from consultation with stakeholders:

- › that provision of transient halting sites was seen as a mid- to long-term action rather than a priority action;
- › that the Council has not yet engaged with other local authorities for a coordinated approach to transient halting sites; and
- › that national bodies have not been in contact with the Council regarding provision of a network of transient halting sites.

The Plan then sets out actions to address the issues as identified above, including:

- › collating and analysis of information to clearly understand the true preferences regarding transient halting sites among the Traveller community;
- › liaison with other local authorities to assess scope to develop a coordinated approach to providing transient halting sites; and

- › engagement with national bodies to explore the feasibility of providing a network of transient halting sites.

Provision of a Caravan Loan Scheme

In respect of the Caravan Loan Scheme, in summary, the Plan identified the following feedback from consultation with stakeholders:

- › that the Council was part of the first pilot Caravan Loan Scheme in 2021 and the second pilot Caravan Loan Scheme in 2022;
- › that there was significant demand for the Scheme with approximately 23 applications waiting for a new Scheme to be launched, with a considerable number of applications from families who are requesting a replacement mobile home;
- › that there have been delays between the end of one pilot scheme and the start of the next which leave families and the Council with no options for acquisition of replacement mobile homes;
- › that no training has been given to Council staff on assessing the loan applications, for example, interpreting credit checks;
- › that in 2021, under the first pilot Scheme, €30,000 was offered to families to purchase a mobile home/caravan with the Council and that 15 loans were granted;
- › that in 2022, under the second pilot Scheme, €40,000 was offered to families and 10 loans were granted;
- › that the cost to the Council of facilitating the scheme is significant, with the average cost of installing a mobile home being €10,000+, and if such costs must be covered by the Council in future schemes, it would greatly limit the value and number of loans being offered;
- › that under both pilot Schemes, the number of applications was greater than the number of loans granted and that for each Scheme, the standard national application form was used and each applicant met with a representative of the Council's TAU, with loans granted using a needs-based and site-specific approach, influenced by available space;
- › that the Council and Traveller representative groups share several concerns regarding the Scheme, including: that the time allowed to run the Scheme is limited; that insufficient funds are available to meet the demand; that the Scheme has

replaced the welfare-based approach to providing housing; that maintenance costs are not included in the Scheme; that issues arise with depreciation and lack of financial sustainability; that concerns that mobile homes will not outlive the loan period; and that mobile homes are not of a residential standard and are not suitable for permanent living;

- › that details of the Scheme were shared with members of the Traveller community through Traveller representative groups and directly during clinics and meetings, and there are approximately 23 applications waiting for a new Scheme to be launched;
- › that the Scheme was communicated in writing to all sites within the Council's functional area, and to any others who had expressed interest in the Scheme;
- › that the TAP has not yet responded to or considered the Scheme in its mid-term review; and
- › that the DHLGH have been provided with feedback on the Scheme.

Under the actions in respect of this issue, the Plan states that the Council does not have control over this Scheme and it is a matter for DHLGH to advise the Council on how to administer it.

The Plan then sets out actions to address the concerns as identified above, including:

- › the Council will advocate with the DHLGH to ensure that the annual Scheme is announced/launched in quarter one to give appropriate time to the Traveller community and the Council to follow through fully on applications, including the Council endeavouring to allow an appeals process for unsuccessful candidates. This action is stated to be dependent on the timeframes set by the DHLGH for the administration of the Scheme;
- › the Council will explore the feasibility and suitability of accommodation types other than mobile homes, such as modular homes as recommended by Traveller families, if the DHLGH extend the Scheme to include other accommodation options;
- › provision of specialist staff training for the assessment of applications, including on interpretation of credit checks, assessment of applications for the ability to pay;
- › assessment of the financial viability and impact of the Scheme to ensure it is poverty proofed for applicants;

- › advocacy by the Council with the DHLGH to increase the budget and funding available outside the Council's resources;
- › continued recording of data in relation to the Scheme and identification of ways to improve the impact and sustainability of the Scheme;
- › forwarding of the evaluation and recommendations to the DHLGH;
- › exploring, in consultation with relevant partners, options for modular housing or chalet accommodation to be offered along with mobile homes;
- › ensuring that the TAU will continue to provide updates on the Scheme to the Traveller community;
- › inclusion of the Scheme in any amendments of the TAP; and
- › continued gathering and sharing of TAU feedback for the Scheme.

Introduction of the ethnic identifier

In respect of the use of the ethnic identifier, in summary, the Plan identified the following feedback from consultation with stakeholders:

- › that the DHLGH 'level change' has been implemented and the social housing form includes optional ethnic identifier for social housing applications from the Traveller community;
- › that the Council will devise and share a one-page announcement of the option to self-identify in the social housing application form with the Traveller community;
- › that the Council has no current process in place to collect and analyse self-identification data; and
- › that there is no current plan in place to use this data to strengthen and inform decision-making in relation to spending on the provision of Traveller-specific accommodation and related services.

The Plan then sets out actions to address the concerns as identified above, including:

- › communication of the option to self-identify on the social housing application form through the TAU and Traveller representative groups;
- › provision of the opportunity for members of the Traveller community to have their records updated;
- › facilitating the TAU to lead on collection and analysis of this data; and

- › developing a plan to use data to inform future TAP and financial plans related to spending on provision of Traveller-specific accommodation and related services.

Engagement with Traveller community in accessing services

In respect of the accessibility of services, in summary, the Plan identified the following feedback from consultation with stakeholders:

- › that there had been recruitment of a specialist Traveller Liaison Officer ('TLO') who has been employed for a three-year period from February 2023 to act as a direct link between the Traveller community and the Council, and that they work within the TAU;
- › that the TAU is due to increase the accessibility of services to members of the Traveller community by facilitating drop-in and phone clinics, and facilitating and supporting access to online services;
- › that the TLO will be the main point of contact for Travellers and will enhance accessibility and ensure supports are responsive to the community's needs;
- › that arrangements regarding the funding and duration of the role of the TLO will be kept under review;
- › that Travellers can directly voice their accommodation concerns as members of the LTACC which meets bi-monthly and includes Traveller representatives, local area Councillors, and a representative from the Council;
- › that Travellers can contact staff in the TAU directly to voice any accommodation concerns;
- › that Traveller representative groups are often used to contact the Council;
- › that Traveller representatives raised concerns that residents who serve on the LTACC are unpaid, receive no expenses or reimbursement for their service, in contrast to elected representatives, paid Council staff, and paid advocacy staff; and
- › that the Council hosts regular clinics where members of the Traveller community can receive feedback on accommodation issues they have raised.

The Plan then sets out actions to address the concerns as identified above, including:

- › employment of the TLO as part of a structured team to support engagement between the Traveller community and the Council;

- › continued development and enhancing of the accessibility of service provision to the Traveller community by the TAU;
- › continuing to support Traveller representation on the LTACC;
- › development of an engagement plan with regular structured meetings with the Traveller community to voice any of their accommodation concerns and connect with the TAU to respond to these concerns;
- › exploring options for the reimbursement of expenses to Traveller residents who sit on the LTACC; and
- › scheduling of regular meetings with the TAU and the Director of Housing to feedback issues and influence plans.

Recording of data on allocated funds

In respect of the draw down and recording of funding, in summary, the Plan identified the following feedback from consultation with stakeholders:

- › that data on funds allocated and drawn down for Traveller specific accommodation is currently recorded and analysed separately from general accommodation and housing applicants;
- › that the Council applies for funds from the DHLGH throughout the year as different projects are ready to action with the funds claimed every quarter;
- › that there are no current procedures that comprehensively allow the Council to take account of the true preferences of members of the Traveller community whose housing needs are met through general housing funds;
- › that there is no report of the varying costs of different forms of accommodation;
- › that there is a separate process to record and report on the draw down and allocation of funding for the refurbishment of existing Traveller specific accommodation;
- › that the new procedures set out in Circular 03/2020 have been working well as funds can be drawn down throughout the year, allowing the Council to better utilise and manage funds and resources; and
- › that the Council sends an expected annual budget to the DHPLG which is not a requirement and that the Council would make the DHPLG aware of proposed projects that are likely to be applied for.

The Plan then sets out actions to address the concerns as identified above, including:

- › continued use of a transparent process to record data on funds allocated and drawn down for Traveller specific accommodation;
- › inclusion of questions in the annual count/census form that capture the true preference of Travellers;
- › undertaking / commissioning research and analysis of the varying costs of different forms of accommodation;
- › continued recording and reporting on the draw down and allocation of funding for the refurbishment of existing Traveller specific accommodation;
- › ensuring there is a separate recording for items of expenditure; and
- › engaging with the DHLGH to ascertain the status of the Council's applications for funds on a more timely basis.

Clarification on steps taken further to Cena report

The Council was invited to clarify, in the Plan, actions taken or planned pursuant to a report that the Council was due to receive from Cena on 21 October 2019, including: to assess and consider the contents of the report; to address the concerns of residents of the halting sites in question; to address the safety issues arising more generally; and to publish details of any such actions taken or planned.

With respect of this issue, the Plan refers to feedback from consultation and, in summary, states:

- › that subsequent to the Cena report and the report of the Ombudsman for Children's Office (the 'OCO'), the Council engaged independent stakeholder engagement specialists to assist with ongoing resident relations in Spring Lane;
- › that subsequent to the reports, the Council engaged independent stakeholder engagement specialists to address and remediate safety issues in Spring Lane; and
- › that information on any actions planned or taken is included in the monthly CEO report to the Council, and that the LTACC minutes and the Housing SPC also include updates which are published on the Council's website.

The Plan then sets out actions to address the concerns as identified above, including:

- › to continue to employ independent stakeholder engagement specialists and engage with Cena where appropriate; and
- › to continue to share such updates via appropriate channels.

Addressing provision of Traveller specific accommodation

In respect of the provision of Traveller specific accommodation, in summary, the Plan identified the following feedback from consultation with stakeholders:

- › that the issue was raised by all stakeholders;
- › that there are projects underway for refurbishment and re-development of existing sites, and development of a new site; and
- › that there is a preference for smaller halting sites situated around Cork city in order to take account of culturally appropriate accommodation for Traveller families and extended / intergenerational co-habitation.

The Plan then sets out actions to address the concerns as identified above, including:

- › setting of goals and clear timelines based on evidence of current need and future demand to extend Traveller specific accommodation within Cork city to alleviate overcrowding in halting sites through a process of consultation and planning, and based on evidence of current need and future demand informing the TAP;
- › initiating a process to identify smaller halting site locations around the city and including these in the TAP.

Response to and implementation of the Equality Review and related recommendations

In respect of responding to the Equality Review and related recommendations, the Plan refers to consultation with stakeholders and reports that the Council provided TCAT in January 2022 across the housing department and intends to roll out further TCAT for the organisation in 2023.

The Plan then sets out actions relating to above, including:

- › development and implementation of an Equality Statement for the TAP;

- › engagement with the TCAT with regular refresher sessions to ensure ongoing awareness of work practices and procedures with equality guidelines and cultural awareness in respect of Traveller accommodation;
- › development of an equality statement for housing allocations;
- › provision of TCAT to all staff;
- › application of new practices arising from the training;
- › development of an equality statement to include direct reference to homeless assessments and allocations; and
- › roll out of TCAT across the organisation and apply new practices arising from the training.

Organisational equality arrangements including equality policy and training

The Plan does not make reference to this issue and no specific actions are included under a separate heading to promote organisational equality arrangements. Reference is made above, however, to inclusion of equality statements in various housing policies and plans, and also to relevant training on Traveller culture.

Public Sector Equality and Human Rights Duty

The Plan does not list detailed actions that directly reference the PSEHRD.

Notwithstanding this, the Plan commits the Council to fulfilling its implementation of the PSEHRD in the introduction section, and makes reference to the Commission's guidelines in this regard. In its introduction, the Plan states that it is:

“a programme of actions which ensure equality of opportunity for members of the Traveller community regarding their access to, and Cork City Council's delivery of Traveller specific / culturally appropriate accommodation and related services.”

The Plan includes a narrative in the introduction that sets out the relevant considerations with respect of implementation of the PSEHRD. The Plan refers to the Council's self-nomination to the Commission to participate as a pilot urban authority for implementation of the PSEHRD and reports on the work undertaken and ongoing with respect of that project.

The Plan states that its preparation was informed by the Commission's guide on the implementation of the PSEHRD, and makes references to the stages of assess, address and report.

The Plan is framed with reference to three objectives, with the third objective being compliance with the PSEHRD. This section includes actions on equality policy and training.

Recommendations

Introduction and overview

The Council's Equality Action Plan is a detailed document that reports on several actions taken since the Equality Review. The Council references wide-ranging actions to improve the accuracy of the census/count, including several progressive steps to improve the process and promote greater engagement of Travellers in the process. There is also considerable detail included in the Plan regarding improving the quality of data on which the TAP is based, and these actions are particularly timely.

The Council provides considerable detail on the wide range of stakeholders consulted in the course of preparation of the Plan. It takes a helpful and clear approach to the manner in which the consultation feedback is presented such that it is directly next to the issue of concern, with actions adjacent to the feedback. It is therefore clear in what manner the feedback is being addressed or taken into account in the Plan. The Commission commends such an approach, as it is designed to avoid feedback from consultation being overlooked and not addressed.

The Commission welcomes the detail in the Plan on the methodology used in its preparation together with the detail on the format of the consultation undertaken. This includes a list of the interviews completed confirming that a wide range of stakeholders were consulted in the preparation phase.

In relation to implementation and oversight mechanisms, the Commission welcomes the specific section within the Plan that sets out how the Plan will be implemented and how fulfilment of the stated goals will be monitored. It makes reference to active leadership of Council management of staff with the co-operation and participation of the Traveller community and their advocates. It is essential that stakeholders have sight of both the Plan and the progress reports and related documents, so their participation can be fully informed.

The Commission commends the establishment of a Steering Group to oversee implementation of the Plan and reference to a timeframe within which it will be completed. As referred to above, in the view of the Commission, it is important that external partners who are on that steering group are fully aware of the contents of the Plan and the

proposed implementation period so they can have a meaningful role in such implementation.

The Commission notes the section in the Plan that discusses the resourcing of the Plan. This includes a welcome statement that responding to the needs of the Traveller community is a Council priority.

In respect of resourcing implementation of the Plan, the Council's consideration of how best to deploy the resources behind the TAU is welcome. In this regard, the Plan proposes to establish a dual structure for the TAU going forward, dividing it into 'operations' and 'strategic', with 'strategic' being responsible for implementation of the Plan and reporting on its progress. Related to this, the Plan proposes to recruit a Senior Staff Officer for a period of five years in order to implement, monitor and report on the progress of the Plan and also to assist in developing the TAP. The Plan also references clerical support that will be available to the Officer.

The Commission commends the commitment to recruit a dedicated staff member to lead on and oversee the implementation of the Plan, and recognises the value in this staff member also contributing to the development of the TAP. It is critical that secure funding is available to resource such a position and that the recruitment is prioritised early in the implementation phase to ensure focused and timely implementation of the actions in the Plan.

Improvement in accuracy of annual count/census of Traveller accommodation need

As noted above, the Plan includes comprehensive and wide-ranging actions to promote improved accuracy of the count/census. The Commission welcomes the broad approach taken under the Plan, which seeks to fully evaluate existing methods with reference to both stakeholders and wider best practice, and proposes the involvement of academic experts. The Commission notes the innovative proposal, identified through consultation, of training peer researchers and would welcome clear time-bound steps and a comment on the resource implications of these actions.

Accuracy and completeness of the TAP

The Plan clearly acknowledges the importance of reliable and robust evidence and the use of that evidence and data to enable an effective TAP. There are welcome commitments to actions aiming to improve the quality of the data relied on in the TAP. The Commission welcomes a commitment to ensure that roles, responsibilities and reporting processes arising from the delivery of the TAP are assigned to relevant stakeholders.

While the consultation feedback is responded to in the actions, the Commission notes a lack of specificity regarding the exact measures to be implemented. The Plan would be strengthened by greater detail on the exact measures to be taken to meet the objective of a more accurate and complete TAP, together with a timeline for completion.

Traveller participation in estate management

This issue was not commented on in a discrete section but was addressed under the below heading and is considered there.

Promoting the practical implications of Traveller ethnicity, respect for Traveller culture and identity in provision of housing services, and sustaining diverse and integrated communities

The Plan makes reference to the existing practices of the Council designed to promote Traveller ethnicity including the provision of animal welfare clinics at halting sites which has evidently been a welcome and positive action.

The Plan includes further actions designed to build on these practices. There is a good level of detail in respect of actions. This includes to promote engagement of members of the Traveller community in estate management and improve community relations, including provision of training and consideration of employment opportunities.

The Commission welcomes the Council's acknowledgement of the importance of animal and in particular horse ownership, and welcomes the commitment to promote an equine trial project. It is important that this be properly funded and progressed in a timely manner. With that in mind, the action would benefit considerably from specific steps being outlined and milestone, and a clear statement on how it will be resourced.

The Commission welcomes the positive emphasis on inter-community relationships and related activities that are included in the Plan.

Provision of appropriate and accessible homeless services

The Plan, pursuant to consultation during its preparation, identified the absence of any specific supports for Travellers who are at risk of, or experiencing, homelessness. The Commission therefore recognises the particular relevance of the proposed actions to develop such supports, and welcomes the plan to avail of any resources and best practice examples available at national level.

The Commission would welcome greater clarity on the roles within the Council to follow through on these actions, particularly with respect of any Traveller Accommodation Unit and Homeless Action Team, and would also welcome consideration of any multi-disciplinary element to the response to Traveller homelessness. The Council's consideration of the issue of hidden homelessness when developing any responses here is an important factor in ensuring the actions respond to the real needs of the affected group.

The Commission notes that the Plan overall indicates the Council's awareness of the practical implications of Traveller ethnicity, including the need for family cohesion, and in other areas, actions are proposed to respond to that issue. The Commission would welcome the inclusion of actions in respect of the provision of homeless accommodation to Travellers that both reflect cultural needs of the community including family cohesion, accommodation of larger family sizes, and access to culturally appropriate emergency accommodation.

Provision of transient halting sites

The Commission welcomes the commitment in the Plan to revisit the issue of provision of transient halting sites and recognises the benefit of coordination with other local authorities and national bodies. There is, however, a lack of detail around how the actions will be rolled out, and there is no reference to consideration of this issue with reference to the TAP. There is also little reference to the Council's prior consideration and consultation on this issue, which is likely to provide valuable context to any actions going forward. Overall,

the actions would benefit from greater precision and detail to ensure they are meaningful and will fully engage on the issue of provision of transient sites.

Provision of a Caravan Loan Scheme

There is a welcome level of detail in the Plan that identifies, through consultation, a number of shortcomings of the Scheme. Many of these are stated to be outside the control of the Council, and it appears that any reformed and improved operation of the Scheme will necessitate the cooperation and input of the DHLGH. The Commission is concerned that there is a substantial delay in both parties acting on feedback on the Scheme, particularly in circumstances where the Scheme is stated to be in demand and the last pilot concluded at the end of 2022.

The Commission welcomes the reference to the shortcomings in the Scheme and identification of actions, within the Council's control, which aim to make it more accessible and effective. These actions appear to have been formulated in direct response to the consultation feedback. For example, the Commission notes the Council's intention to explore options for alternatives to be offered along with mobile homes, including modular housing or chalet accommodation.

It is evident that the timescales for the current cycle of the Scheme are problematic. It is noted that there are some actions within the control of the Council that could improve the overall running of the Scheme and it would be important for those to be prioritised for early 2024 to improve the overall accessibility and functionality of it.

Introduction of the ethnic identifier

The Commission notes the sparse detail in this section, both in respect of actions taken to date and proposed actions.

The ethnic identifier has been included in the social housing application form since April 2022 yet when the Plan was prepared, there was no process being developed or in place to enable the Council to capture and use this data to inform spending on and delivery of Traveller-specific accommodation. The reason for this is not apparent from the Plan, and it is therefore unclear what the current position is with familiarity and use of the identifier.

The Commission believes that the Plan would be strengthened by more wide-ranging actions to address the potentially sensitive issue of data collection. There is no acknowledgement of or reference in the Plan to potential digital or literacy barriers to Travellers accessing the identifier. There does not appear to be any clear plan to consult with Travellers and their representative groups on how the Council might best approach any data collection on ethnicity. More detailed steps on how the data would be analysed and used would considerably strengthen the Plan.

Engagement with Traveller community in accessing services

The Commission welcomes the action taken by the Council to employ a TLO, noting that this was recommended in the preceding Equality Review. The Plan evidences the related actions that flow from such an appointment, including increased mechanisms for engagement by Travellers with the housing services of the Council.

The Commission also welcomes the proposal to explore options for reimbursing expenses of Traveller representatives on the LTACC and recognises that this is likely to facilitate their engagement in that Committee which is essential for its effective functioning.

The Commission notes the planned action to develop an engagement plan with regular meetings so that Travellers can voice accommodation concerns. There is a lack of detail on whether such a planned action is one that was proposed by Travellers, or Traveller representative groups, and how such a forum would work in practice.

Recording of data on allocated funds

The Commission welcomes the actions included in the Plan to continue its recording data on funds allocated and drawn down for Traveller specific accommodation, including, separately refurbishment. Actions to ensure the true housing preference of Travellers are important steps on this issue, and the Commission would welcome development of such actions in consultation with key stakeholders.

It is unclear to whom this data is being provided and how it is impacting or influencing on housing decisions regarding Traveller accommodation. Greater detail on the purpose and goal of the recording of data would strengthen the Plan.

The Commission notes the analysis of the operation of Circular 03/2020 contained in the Plan and welcomes engagement by the Council with the DHLGH to ensure new processes run smoothly and effectively, serving the ultimate end point of timely and adequate delivery of culturally appropriate accommodation to Travellers within the Council's functional area.

Operation of Circular 03/2020

This issue was not addressed in a discrete heading in the Plan but was commented on in respect of the above concern.

While the response above indicates that the Council is actively monitoring the operation of the Circular, the Plan would have been strengthened by further detail on how it was impacting on the rate of drawdown of funding for Traveller specific accommodation and a stated method for assessing effectiveness of the new system.

Clarification on steps taken further to Cena report

The Commission welcomes the Council's engagement of external specialists to address the several issues arising.

It is unclear from the Plan what impact such engagement has had in addressing the core concerns regarding the site and to respond to the issues raised in the reports. In the Commission's view, the Plan would be considerably strengthened by clear references to published statements/actions of the Council and detail on how the issues on the site are to be properly and robustly addressed.

Addressing provision of Traveller specific accommodation

The Commission considers the delivery of Traveller specific accommodation to be a key overall priority and welcomes actions that are designed to deliver on this overall goal.

The Commission is concerned, however, at a lack of detailed steps set out in the Plan to ensure that the overall aim of provision of such accommodation will be achieved. It is important that goals set have clear timelines for completion.

The Commission welcomes the consultation undertaken with respect of this issue, and the identification of actions to respond to the feedback including, for example, that smaller halting sites would best meet the needs of Traveller families.

It is noted that the demand for smaller halting sites was identified pursuant to the Equality Review undertaken in 2019. The Plan does not detail any reason for a delay in progressing this issue. In the Commission's view, it is essential that the Council identify, through the Plan, any underlying reasons for such delay.

Response to and implementation of the Equality Review and related recommendations

The Council welcomes training to be provided to housing staff on Traveller culture, implemented as part of actions to promote equality of opportunity and eliminate discrimination. Such training is proposed to continue and be expanded to all staff, which is welcome by the Commission. An evaluation of the relevance and impact of such training would be a valuable tool to ensuring it has a positive role in promoting equality.

The Commission welcomes the proposals to include an equality statement in the TAP, for housing allocations, and for homeless assessments. There is no detail on how such statements are to be developed, in consultation with whom and within what timeframe, all of which would help ensure the achievements of these net goals.

Organisational equality arrangements including equality policy and training

The Plan does not make reference to this issue specifically and no discrete actions are included under any separate heading aiming to promote organisational equality arrangements. Reference is made above, however, to inclusion of equality statements in various housing policies and plans, and also to relevant training on Traveller culture.

Notwithstanding this inclusion, the Commission would welcome a more robust training plan that encompasses broader equality training. Such training is likely to be of relevance to members of the LTACC and other committees involved in decisions or consideration of Traveller housing issues.

Public Sector Equality and Human Rights Duty

The PSEHRD contained in Section 42 of 2014 Act requires all public bodies in the State to eliminate discrimination, promote equality, and protect the human rights of their staff, customers, service users and everyone affected by their policies and plans.

Compliance with the PSEHRD requires a public body to carry out a three step process to meet the statutory obligations

1. **Assess:** to carry out an assessment of the equality and human rights issues relevant to their functions and purpose;
2. **Address:** develop policies, plans and actions to address issues raised in the assessment;
3. **Report:** report annually on progress and achievements in relation to identified policies, plans and actions.

A public body is required to publish its human rights and equality assessment, and the policies, plans and actions in place or proposed to be put in place to address the issues identified in that assessment, in a manner that is accessible to the public in its strategic plan/corporate plan.

The PSEHRD is an ongoing obligation and to ensure compliance with the duty on an ongoing basis a public body must before reviewing, developing or adopting a plan, policy, strategy, programme or service and making a key decision public bodies would have regard to the PSEHRD.

The Council has demonstrated a clear and thorough understanding and commitment to its statutory obligations pursuant to the PSEHRD in the preparation, development and proposed implementation of the Plan. Each action is clearly linked to an outcome of consultation and engagement with Travellers and representative groups, demonstrating that the Council has had regard to the PSEHRD.

The Plan is informed by the equality and human rights issues identified in consultation, and considers the issues identified in consultation with specific focus on Traveller accommodation services. It sets out actions to take to address the issues identified and

proposes a number of actions to further explore the equality and human rights issues experienced by Travellers with regard to Traveller accommodation services, so as to identify solutions to improve outcomes for Travellers.

The Plan sets out an evidence based actions/objectives supported by consultation and actions proposed are specific and relevant to Traveller accommodation.

Conclusion

The Council's engagement in preparing the Equality Action Plan is to be commended and the Commission is conscious of the considerable time and resources committed to completing same.

The Commission welcomes the manner in which the Council has undertaken its preparation of the Plan, noting the documented methodology and wide-ranging consultation. The Commission also welcomes the way in which the Plan is presented, such that feedback from consultation is clearly set out with reference to related actions designed to address the issues arising.

The Commission welcomes the Council's consideration of how the Plan will be implemented and resourced, and recognises the importance of having in place a dedicated staff member and steering committee at the earliest opportunity to drive implementation of the Plan and monitor and review progress in that regard.

In some parts, the Plan is lacking in detail, including for example, on how data on draw down and spend on Traveller specific accommodation is to be shared and used within the Council. The Commission would also welcome greater detail on broader organisational equality arrangements.

There is little reference to the role of the LTACC in implementation of the Plan and this, in the view of the Commission, is a potential gap. It is essential that the LTACC has capacity, training and support to operate effectively.

The Commission welcomes the high level of detail on actions designed to properly address the shortcomings in the data on Traveller housing preferences, and anticipates that if prioritised, such actions have the potential to impact positively on the accuracy and impact of the upcoming TAP.

The overall success of the actions in the Plan - including in respect of gathering of robust and accurate data - will depend, in part, on positive relationships between key stakeholders, including between the Council, Travellers and Traveller representative groups. The Commission welcomes actions to foster and promote such positive relationships and communication together with a partnership approach to addressing the issues arising.

Appendix 1

In terms of the findings in the Equality Review and the related published account of that review, including the recommendations of the Commission, the following matters would now fall to be properly addressed in an Equality Action Plan:

- a. Please clarify the steps taken to date, or planned, where appropriate in coordination with any national bodies (such as the Department of Housing, the Programme Board, and the National Traveller Accommodation Authority (the 'NTACC')), to improve the accuracy of the annual count/census of Traveller accommodation needs in the functional area of the Council, including steps:
 - i. to evaluate the existing methods used for the count/census in consultation with members of the Traveller community and representative groups, and action findings of this evaluation including on accuracy and efficacy of current methods;
 - ii. to improve the quality and accuracy of the count/census of Traveller accommodation needs, where appropriate in coordination with national bodies and other local authorities;
 - iii. to engage peer researchers in the carrying out of future surveys with members of the Traveller community, and to provide respondents with the option to take part in locations other than the Council's offices in order to increase response rates;
 - iv. to enable accurate capturing of multiple accommodation preferences of members of the Traveller community within the Council's functional area;
 - v. to ensure that any additional and relevant information that will impact on accommodation planning and/or delivery is properly captured in the count/census, including new family formations and other demographic indicators; and
 - vi. to implement processes for that information to directly influence decisions and policy on Traveller accommodation provision by the Council.
- b. Please clarify the steps taken to date, or planned, to address the manner in which data is presented - specifically in the Traveller Accommodation Programme (the 'TAP') and related progress reports - to ensure their accuracy and completeness, in particular ensuring they include the following:

- i. a breakdown, by accommodation type, of current accommodation status of Travellers in the functional area of the Council, where appropriate linked to above action (a);
 - ii. details of the specific accommodation needs and preferences of Travellers in the functional area of the Council, and how these are identified;
 - iii. details of how these accommodation needs are to be met through the TAP and related processes, with assignment of roles to relevant stakeholders responsible for delivering on the TAP; and
 - iv. details of the impact on targets within the TAP of the estimation of the number of additional families housed within Traveller-specific housing, or through other means.
- c. Please clarify the steps taken to date, or planned, to recognise and promote the practical implications of Traveller ethnicity, to ensure respect for Traveller culture and identity in the provision of housing services including standard housing, and to sustain integrated and diverse communities, to include:
 - i. consultation with the relevant community and representative groups on the practical implications of Traveller ethnicity and the identification of priorities of Travellers within the functional area of the Council;
 - ii. where identified as needed by the affected community, the promotion and facilitation of home-ownership by members of the Traveller community residing in the functional area of the Council and availing of social housing support;
 - iii. where identified as needed by the affected community, the promotion of family cohesion and connection with extended family in the provision of housing to members of the Traveller community residing in the functional area of the Council;
 - iv. responses to the other needs of members of the Traveller community to promote and foster respect for Traveller culture; and
 - v. engagement with Traveller and non-Traveller communities with the overall aim of fostering positive community relations.
- d. Please clarify the steps taken to date, or planned regarding Traveller participation in estate management and development of the Council's function regarding estate management for Traveller accommodation, including consultation with Travellers

within the Council's functional area and their participation in relation to estate management functions and responses of the Council.

- e. Please clarify the steps taken to date, or planned, regarding culturally-specific responses to the needs of Travellers experiencing homelessness, including:
 - i. the provision of culturally appropriate homeless accommodation to members of the Traveller community who are experiencing homelessness, that responds to the preferences and needs of this group by, for example, providing accommodation that takes proper account of family size and reliance on family networks for support;
 - ii. the provision of specific supports for members of the Traveller community who are at risk of, or experiencing homelessness, ensuring that such supports are accessible and responsive to their needs, and that they take account of digital and literacy challenges faced by some members of the Traveller community; and
 - iii. the coordination and alignment of any actions and plans regarding homeless accommodation provision to members of the Traveller community with any national bodies (including, for example, the Programme Board and the Department of Housing's Traveller Accommodation Support Unit), thereby taking account of best practice developed at that level and making use of financial and research supports to inform appropriate actions.
- f. Please clarify the steps taken to date, or planned, responding to the needs of Travellers who are nomadic within and through the county, through the provision of transient halting site bays as required, including:
 - i. engagement with members of the Traveller community within the Council's functional area through the mid-term TAP review and/or other processes, to ascertain their true preferences with regard to transient halting sites and specifying actions to be taken pursuant to such engagement;
 - ii. engagement, where appropriate, with other local authorities for a coordinated approach to provision of transient sites in the region, and identification of locations for transient sites; and
 - iii. cooperation and coordination with national bodies (including, for example, the Programme Board, the Housing Agency and the Department of Housing) in relation to provision of a network of transient halting sites.

- g. Please clarify the steps taken to date, or planned, to strengthen the availability and accessibility of the Caravan Loan Scheme, including details of:
- i. the current status and form of the Caravan Loan Scheme, noting that the scheme had been reintroduced in November 2018 on a trial basis (the ‘scheme’) and was due to be reviewed at the end of 2019 to determine its viability, and noting the introduction of the pilot Caravan Loan Scheme in July 2021 (the ‘pilot scheme’);
 - ii. expenditure under the scheme since its reintroduction in November 2018 and the pilot scheme introduced in July 2021;
 - iii. the number of applicants to the scheme and the pilot scheme, the number of applications that were successful, and the number of applicants who have, in fact, been in receipt of a caravan pursuant to the schemes from November 2018 to July 2021, and from July 2021 to the present;
 - iv. any evaluation(s) undertaken of the scheme and the pilot scheme, and actions planned or proposed on foot of the findings of any such evaluation(s);
 - v. details of the communication of any ongoing Caravan Loan Scheme (pilot or otherwise) to members of the Traveller community within the functional area of the Council in an accessible manner;
 - vi. the funding arrangements for any ongoing Caravan Loan Scheme;
 - vii. any consideration of the Caravan Loan Scheme in the course of the mid-term TAP review and related amendments to the TAP on foot of that consideration; and
 - viii. the evaluation tools and reporting mechanisms that apply to the effectiveness of the scheme in its current form.
- h. Please clarify the steps taken to date, or planned, to respond to the introduction of the ethnicity identifier in the application form for social housing support, including:
- i. informing members of the Traveller community of the option to self-identify in the social housing application form;
 - ii. collection and analysis of this data by the Council; and
 - iii. use of the data to strengthen and inform decision-making including in relation to spending on provision of Traveller-specific accommodation and related services.

- i. Please clarify the steps taken to date, or planned, to introduce new or updated practices to support members of the Traveller community in their engagement with the Council on housing issues, including to:
 - i. employ a dedicated Traveller Liaison Officer including information on any engagement with the Department of Housing, funding arrangements for such a role, and detail on the role and duration of appointment;
 - ii. enhance the accessibility of service provision to members of the Traveller community, for example by way of drop-in and phone clinics and facilitating and supporting access to online services where required, ensuring that such supports are accessible and responsive to their needs, and take account of digital and literacy challenges faced by some members of the Traveller community;
 - iii. provide avenues for members of the Traveller community to directly voice any concerns they may have in respect of their accommodation and other related issues; and
 - iv. arrange regular meetings with members of the Council mandated with housing issues to ensure regular feedback to on accommodation issues raised by members of the Traveller community.
- j. Please clarify the steps taken to date, or planned regarding the recording of data specifically on funds allocated and drawn down, including:
 - i. clear and transparent recording of data on funds allocated and drawn down for Traveller-specific accommodation, and separately for those for general accommodation for all housing applicants;
 - ii. implementing procedures that enable the Council to take account of the true preferences of members of the Traveller community whose accommodation needs are met through general housing funds and of the varying costs of different forms of accommodation; and
 - iii. recording and reporting on the draw down and allocation of funding for the refurbishment of existing Traveller-specific accommodation, i.e. separate to the general draw down and allocation of funds for new Traveller-specific accommodation, and separate to the funding from general housing funds for provision of housing to members of the Traveller community.

- k. Please clarify the steps taken to date, or planned, to assess and analyse the operation of new procedures set out in Circular 03/2020 (from the Department of Housing) on the rate of drawdown of funding for Traveller-specific accommodation, including to measure the effectiveness of the new system for 2022, 2023 and beyond, and addressing any issues arising.
- l. Please clarify the steps taken to date, or planned, pursuant to the report that the Council was due to receive from CENA on 21 October 2019, including:
 - i. to assess and consider the contents of the report;
 - ii. to address the concerns of residents of the halting sites in question;
 - iii. to address the safety issues arising more generally; and
 - iv. to publish details of any such actions taken or planned.
- m. Please clarify the steps taken to date, or planned, regarding Traveller accommodation provision within the functional area of the Council, including to:
 - i. set further goals to extend Traveller-specific accommodation within Cork City, in particular to alleviate the overcrowding in halting sites; and
 - ii. progress the process of identifying locations for smaller halting sites situated around Cork City.
- n. Having regard to the Equality Review and related recommendations, the Council is in particular invited to clarify the steps taken to date, or planned, regarding:
 - i. the development and implementation of its equal status policy;
 - ii. the inclusion of an equality statement in the TAP;
 - iii. the inclusion of an equality statement in the Allocations Scheme; and
 - iv. the development and implementation of additional Council equality policies, if any.
- o. With regard to the Equality Review and related recommendations, the Council is, in particular, invited to clarify the steps taken to date, or planned, to:
 - i. have regard to the need to eliminate discrimination, promote equality of opportunity and to protect the human rights of its staff and the persons to whom it provides services in any review or preparation of the TAP as required under section 42(1);
 - ii. have regard to the need to eliminate discrimination, promote equality of opportunity and to protect the human rights of its staff and the persons to whom

it provides services in the assessments of housing applications and allocations, as required under section 42(1); and

- iii. have regard to the need to eliminate discrimination, promote equality of opportunity and to protect the human rights of its staff and the persons to whom it provides services in homeless assessments and allocations as required under section 42(1).



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