

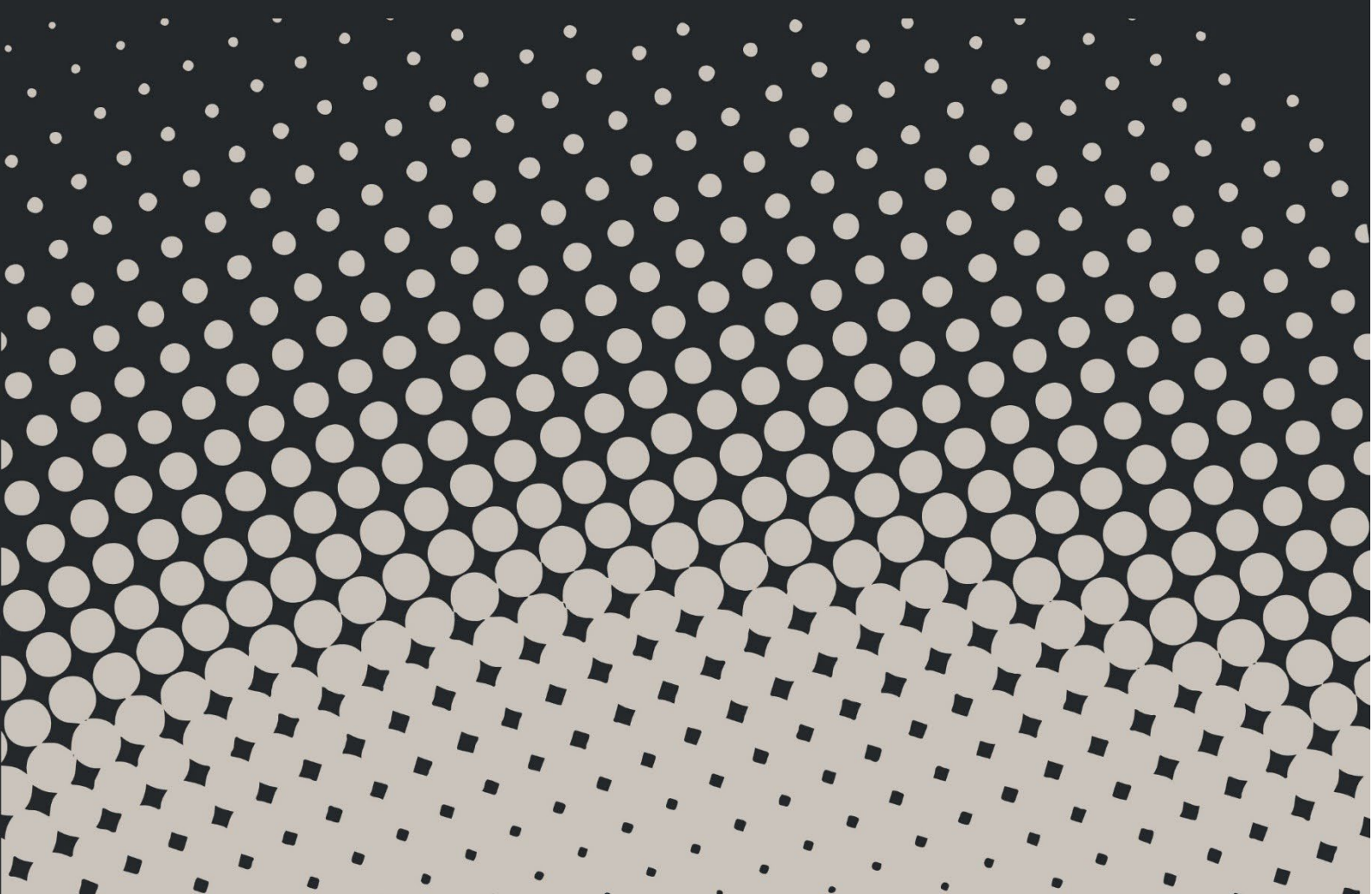


Coimisiún na hÉireann um Chearta  
an Duine agus Comhionannas  
Irish Human Rights and Equality Commission

# An Account of the Equality Action Plan prepared by Limerick City and County Council in respect of Traveller specific accommodation

Irish Human Rights and Equality Commission

June 2024



Published by the Irish Human Rights and Equality Commission.

Copyright © Irish Human Rights and Equality Commission 2024

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

Introduction .....4

Summary of Actions identified in the Equality Action Plan .....5

Recommendations.....17

Conclusion .....33

# Glossary

---

2014 Act:	Irish Human Rights and Equality Act 2014
AHB:	Approved Housing Body
AGS:	An Garda Síochána
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
CENA:	The Traveller-led Voluntary Accommodation Association (TVAA)
CRM:	Customer Relationship Manager
DHPLG:	Department of Housing, Planning and Local Government, known as the Department of Housing, Local Government and Heritage (DHLGH) since 30 September 2020
DRHE:	Dublin Region Homeless Executive
DSP:	Department of Social Protection
ESA:	Equal Status Acts 2000 - 2018
HAP:	Housing Assistance Payment
HSE:	Health Service Executive
LDC/LCDC:	Local Development Company/Local Community Development Company
LTACC:	Local Traveller Accommodation Consultative Committee
NGO:	Non-Governmental Organisation
RAS:	Rental Accommodation Scheme
SSHA:	Summary Social Housing Assessment

SPC:	Strategic Policy Committee
TAP:	Traveller Accommodation Program
TAU:	Traveller Accommodation Unit
TLO:	Traveller Liaison Officer
TIF:	Traveller Inter-agency Forum
TIG:	Traveller Inter-agency Group

# Introduction

---

In June 2019, Limerick City and County 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 October 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 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 an Equality Action Plan (the '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

---

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

The Plan reports on actions taken to date with respect of improving the accuracy of the annual count/census of Traveller accommodation needs in the functional area of the Council. It states that the main determinant of housing provision is the completion of the social housing application form that, since August 2022, includes an 'ethnic identifier' and allows for the selection of multiple accommodation types and areas of choice.

The Plan reports that a Summary of Social Housing Assessment ('SSHA') is carried out annually. It references engagements with Traveller applicants, representative groups including the LTACC and advertising on local radio and in local newspapers.

The Plan reports that it carries out the Annual Estimate of accommodation of Traveller families each year as directed by the DHLGH. It states that this provides a relatively consistent measure and tracks changes to the position, year on year.

The Plan reports that the SSHA and the Annual Estimate inform the drafting of the TAP.

The Plan reports on other activities aiming to properly inform the count including, for example, consulting with other departments within the Council and outside voluntary and statutory agencies who work with Traveller families.

The Plan sets out planned actions to address issues with the accuracy of the count, including:

- › use of the new Traveller identifier to extract relevant Traveller data from the housing assessment system;
- › use of new Traveller accommodation choices with all new housing applicants to create data on types of accommodation;
- › writing to all known Traveller applicants offering them a "*simplified*" ethnic identifier form and offering them a Traveller accommodation choice form;
- › evaluation of existing methods used for identification of Travellers with all Traveller groups in Limerick and actioning of findings; and

- › assistance to the “CSC” to engage with local representative organisations if requested.

## **The work of the LTACC**

The Plan reports on the operation of the LTACC stating that it meets every three months, provides a ‘safe space’ to Traveller members by briefing them in advance and offers them the opportunity for one to one discussion in advance or following the meeting. It also reports on engaging with an external expert organisation in relation to training.

In relation to further planned actions, the Plan states that all members of the LTACC are to complete human rights and equality competency training. The Plan states that officials on the LTACC are to participate in equality training of the Commission. It states that the Council will hold meetings with Traveller groups in Limerick in order to promote Traveller engagement, participation and representation on the LTACC.

The Plan states that Traveller groups will be encouraged to make presentations at the LTACC and the Council will liaise with individual members to promote the forum as a ‘safe space’. The Plan states that field trips will be organised to Traveller accommodation projects by LTACC members.

## **Accuracy and completeness of the TAP**

The Plan references the Council’s current TAP and its policy to provide Traveller specific accommodation and standard housing options.

The Plan reports on actions to date with respect of presentation of data in the TAP, including:

- › the use of the new Traveller identifier to extract relevant data from the housing assessment system;
- › the use of new information on Traveller accommodation choices with all new housing applicants to create data on types of accommodation; and
- › regular progress reports being given to the LTACC.

In relation to planned actions, the Plan sets out the data the Council will provide in the next TAP including: total applicants with classification Traveller and their area of choice,



approved bed type, household size, length of time on the waiting list, and the number of applicants by area of first choice within each district. It states that this information will bring it in line with the data provided in the Council's Housing Delivery Action Plan 2022 to 2026.

With respect of the forthcoming TAP, the Plan states that the Council will identify key priorities to be delivered, outline how these priorities will be delivered in the timeframe of the TAP, ensure communication is clear and easy to understand, and will identify constraints where they exist.

## **Provision of appropriate and accessible homeless services**

The Plan reports on the structure of a multi-disciplinary team, coordinated with the HSE, which is in place to support access to and provision of appropriate services to Travellers presenting as homeless. There is no TLO reported to be in that team. The Plan reports on the qualifications and training of the team members and their high level of competency working with minority groups including Travellers. The Plan references a Regional Coordinator for homeless and ethnic minorities within Social Inclusion HSE Mid-West.

The Plan reports on its current procedures when a member of the Traveller community presents as homeless, including the recording of their ethnicity and the use of this data for reporting and strategic planning purposes. The Plan reports that, currently, homeless assessments of Traveller applicants are prioritised and a coordinated response is implemented.

The Plan sets out planned actions in relation to responding to homelessness of Travellers. It states that data on Traveller homelessness will be presented to the LTACC on an annual basis.

The Plan identifies various actions of the TAU in respect of Traveller homelessness, including:

- › working with CENA where appropriate;
- › working with the Council's Allocations Team to prioritise families where appropriate;
- › working with an external expert organisation on facilitation;
- › working closely with DHLGH to draw down funding for the Caravan Loan Scheme;
- › engaging with vulnerable families sooner in order to prevent homelessness where possible;

- › considering allocation of “all available space on the existing Traveller Specific Accommodation”;
- › working closely with Travellers to break down barriers with regards to literacy, digital and financial supports where identified; and
- › directing applicants to external services as appropriate.

The Plan also states that the Council will finalise recruitment of a social worker.

## **Traveller participation in estate management**

The Plan reports on efforts over the years to engage residents of Traveller specific accommodation in estate management, including reference to a Community Sustainment Unit within the Council.

The Plan reports on specific actions taken to date, including:

- › tenancy induction training;
- › provision of weekly waste disposal collection at Traveller specific accommodation;
- › follow up visits by the Community Sustainment Officer to support transition into new homes;
- › working with NGOs and other government bodies to improve the living environment of Traveller tenants; and
- › an application to Dormant Accounts and receipt of funding to carry out training on tenant participation.

The Plan sets out planned actions in relation to engagement of Traveller tenants in estate management, including:

- › development of an easy to read tenants’ handbook for Traveller specific accommodation maintenance issues;
- › training for tenant participation in Traveller specific accommodation supported by an external expert organisation; and
- › continuing to liaise with the DHLGH in relation to funding for maintenance of Traveller specific accommodation.

The Plan references research commissioned by the Programme Board on the planning and design of Traveller specific accommodation and proposed new guidelines on same. The Plan states that the Council will:

---

“endeavour to implement the new guidelines when produced.”

---

## **Promoting the practical implications of Traveller ethnicity**

The Plan reports on several actions taken to date to ensure respect for Traveller culture and identity in the provision of housing services and to sustain integrated and diverse communities, including:

- › the setup of an enhanced TAU with a social work service for Travellers;
- › specific welfare and maintenance phone lines, and a specific email address, for Travellers;
- › operation of Traveller clinics;
- › employment of a private contractor to provide a 24/7 caretaker/maintenance service;
- › a separate capital works programme;
- › support for Rathkeale Together Programme;
- › funding for various support services such as Limerick City Women’s Traveller Network, the Regeneration Directorate, LCDC, and Traveller Pride;
- › provision of accommodation to families with connection and supports in Traveller specific accommodation and standard housing where possible; and
- › provision of wraparound service to Traveller families if deemed necessary in a new tenancy.

The Plan sets out various planned actions including equality training of Council staff and the employment of a Diversity / Inclusion Officer to run new programmes.

The Plan states that the TAU will:

- › work closely with local Traveller groups;
- › encourage Traveller groups to provide talks to Council staff; establish stronger links with Rathkeale Together; and
- › work with LDCs to develop further integration programmes.

The Plan states that the Council will meet with non-Traveller communities where specific development proposals may impact on their locality.

The Plan states that Limerick Traveller horse owners will be encouraged to participate in an equestrian project being developed by Limerick Regeneration Directorate. Further general information on that project is provided with the Plan by way of an appendix.

## **Provision of transient halting sites**

With respect to provision of transient halting site bays, the Plan states that a need for transient sites was not established in the TAP 2019 to 2024.

It states that the need for and provision of such a site in Rathkeale was nonetheless identified and will continue to be provided in Rathkeale within existing resources. In addition to this, the Plan states that construction of private sites in designated areas of the town is provided for in the Local Area Development Plan. The Plan states that this is to facilitate local Traveller families who lead a transient lifestyle to develop their own property, which is stated to be their preferred option.

The Plan sets out planned actions in relation to transient halting sites. It includes an action to have open discussions with all Traveller groups in the county in the course of developing the next TAP.

The Plan references the engagement of the Programme Board with the Housing Agency and the Northern Ireland Housing Executive on the feasibility of an all-island approach to the provision of transient sites. It states that the Council will consider this report when produced.

## **Provision of a Caravan Loan Scheme**

The plan provides the following information on provision of Caravan Loan Schemes as of July 2019: that three loans to the value of €106,500 have been paid out under the pilot Caravan Loan Scheme in response to five applications for the scheme.

It states that following consultation with the families who received the loans and staff involved in the provision of the loans, the Scheme was deemed successful as three families benefitted from improved accommodation.

The Plan states that the Scheme was considered in the course of the mid-term TAP review but no related amendments to the TAP were made. The Plan states that it has encouraged the DHLGH to continue the Scheme.

In relation to planned actions, the Plan indicates that continuation of the Caravan Loan Scheme is not confirmed. It states that if it is continued, the TAU will communicate details of the scheme directly to Traveller families who attend the Traveller clinic and details will also be communicated through the LTACC and to Traveller and other organisations.

The Plan states that the Council will request DHLGH to provide an evaluation tool to monitor the effectiveness of the Caravan Loan Scheme should it be continued.

## **TAP provision for Travellers on the roadside or on unofficial sites**

The Plan reports on the Council's engagement with Travellers who are residing on the roadside or an unofficial site. It states that the Homeless Action Team and Planning Enforcement Team advise the TAU in such instances, and a full assessment of housing need is carried out.

In terms of planned actions, the Plan states that the Council will continue to *“track and assess”* Traveller families parked on the roadside or unofficial sites.

## **Introduction of the ethnic identifier**

The Plan references introduction of the housing application form with the ethnicity identifier in August 2022. The Plan sets out proposed actions responding to this introduction which duplicate some actions already referenced. These actions include the TAU informing Travellers of the identifier through information sessions, correspondence, use of a 'simplified' ethnic identifier form and a Traveller accommodation choice form. The Plan states that new housing applicants will be advised of the identifier when the assessment takes place and there will be training of the assessment team in capturing such data.

The Plan sets out proposed actions on the use of the relevant data, including:

- › to extract relevant Traveller data from the housing assessment system; and

- › to create data on the accommodation types of new housing applicants, in the planning of the TAP, and for analysis by the TAU to apply for appropriate funding to the DHLGH.

## **Engagement with Traveller community in accessing services**

The Plan reports on steps taken to date to support Travellers in their engagement with the Council on housing issues, several of which are already set out above in respect of other areas of concern.

The Plan reports on a dedicated and enhanced TAU. It reports on the recruitment of new staff to deliver its services including a new Senior Manager for the TAU, a new Executive Engineer to work solely on Traveller accommodation, a new staff officer, and a new Community Sustainment Officer.

The Plan refers to a new maintenance contract in place with a private contractor, available 24/7, 365 days a year. It refers to the dedicated phone lines for welfare and maintenance, and the operation of a Traveller clinic.

Reference is made to the training of the TAU and other Council staff on supporting clients with digital or literacy issues, and that the TAU has undertaken IHREC e-training.

The Plan references the work of the TAU including its engagement with Travellers, with Traveller groups, and with the Community Sustainment Team and other Council departments. It also notes that Traveller families can voice concerns on housing issues through their representatives on the LTACC and through public representatives.

The Plan sets out proposed further actions, some of which are duplicated in responses on related issues, including, for example the completion of a tenancy handbook on maintenance issues, the recruitment of a social worker, and training for all LTACC members.

The Plan states the Council will carry out a pilot project in a halting site in the Metro area of Limerick to evaluate the effectiveness of community sustainment. Information is provided by way of an appendix to the Plan. The focus of this pilot project is on waste disposal and illegal dumping.

## **Recording of data on allocated funds**

The Plan comments on the Council's processes for recording of expenditure on Traveller specific accommodation and other related services. The Plan states that the Council provides an annual estimate of expenditure across all its services and provides an annual financial statement at the end of the year. It states that the Council provides a three year capital budget.

The Plan states that in its annual report the Council sets out the steps taken in the preceding year to implement the TAP.

The Plan states that the TAU reports to the LTACC on an annual basis on both capital and revenue expenditure with regard to Traveller-specific accommodation.

The Plan then sets out proposed actions in respect of recording of expenditure including the provision of an annual report to the LTACC and the Home and Social Development SPC on the following:

- › funding approved for capital works for Traveller specific accommodation construction and acquisitions together with expenditure;
- › funding approved for improvement to Traveller specific accommodation and improvement to date;
- › capital spending on non-Traveller specific housing; and
- › revenue funding on Traveller specific housing and recoupment from the DHLGH.

## **Operation of new procedures pursuant to Circular 03/2020**

The Plan reports on steps taken to date pursuant to new procedures set out in Circular 03/2020. It makes reference to the new staff recruits as detailed above including senior manager, engineer, staff officer and Community Sustainment Officer.

The Plan references proposed actions including: regular meetings with the DHLGH regarding funding requirements and regular meetings with *“identified families”* to secure agreement on projects.

## **Addressing delays in delivery of Traveller specific accommodation**

The Plan reports on steps taken to address delays in delivery of Traveller specific accommodation provision. The Plan reiterates the provision of an enhanced TAU team and again references the newly recruited staff.

The Plan references proposed actions, including that the Council will keep under consideration the engagement of an independent body to carry out an assessment of delivery pending progress on projects by the Council and CENA. The Council also states that an improved record of consultation will be maintained in projects going forward to allow for future assessment.

The Plan references the intention to engage an expert external organisation for facilitation to reach agreement with families, if required, and to provide training and advice, as needed.

## **Accommodation needs of Crescent Halting Site residents**

The Plan provides details of steps taken to date in relation to meeting the accommodation needs of the Crescent Halting Site pursuant to the recommendations of CENA. The Plan states that CENA has been requested, as an AHB, to source appropriate accommodation for the residents. It states that the TAU is in communication with the residents regarding relocation, is endeavouring to locate suitable sites and/or houses for families willing to leave the site, and has been in contact with an external expert organisation with regard to the families on the site.

The Plan sets out proposed actions in relation to the Crescent Halting Site including: that the TAU will continue to work with families *“who wish to improve their accommodation”*, with families *“who are willing to leave the site”* and will continue to engage with CENA regarding sourcing of accommodation.



## **Response to and implementation of the Equality Review and related recommendations**

The Plan reiterates several actions taken to date to ensure implementation of the Equality Review including the enhanced staffing in the TAU, the implementation of an ethnicity identifier, and the amended housing application form to allow for choice of accommodation. The Plan also states that the Council operates a broad equality policy.

The Plan references completion of two housing projects identified in the Equality Review, specifically Kilmurray Halting Site which is stated to be complete, and Clonlong Halting Site where phase 1 is stated to be complete. It also references the steps set out above in relation to New Crescent Halting Site.

## **Organisational equality arrangements including equality policy and training**

The Plan makes reference to steps taken to progress equality policy and training including the establishment of an in-house group to review the existing organisational policy which will incorporate organisational equality arrangements and make recommendations regarding same.

The Plan references research carried out by the Council on procurement of professional equality specialist organisations to carry out a review of all services including housing services. Reference is made to IHREC e-training undertaken by TAU staff, and engagement of an external expert organisation for provision of training.

The Plan references various proposed actions, several of which are extensions of the actions that are already in process.

The Plan commits the Council to including an equality statement in the forthcoming TAP and to include an equality statement in its allocations policy. It also states that equality training will be provided to all members of the LTACC and states that it will improve communication with Traveller groups.

## **Public Sector Equality and Human Rights Duty**

In respect of the PSEHRD, the Plan provides details on its existing strategies under the following broader strategies including: the Migrant Integration Strategy: A Blueprint for the Future, the National Disability Strategy Inclusion Strategy 2017 – 2021; the Quality Customer Services initiative; the National Action Plan for Social Inclusion 2018 – 2021; the National Traveller and Roma inclusion Strategy 2017-2021.

The Plan then references the Council's proposed actions, including:

- › provision of training to raise overall awareness of the PSEHRD within the Council for designated housing staff, other Council staff and elected members;
- › use of IHREC tools and guidance in relation to implementing the PSEHRD; and
- › the engagement with the services of an equality expert for all services including housing with amendments the plan to be made on foot of expert advice.

# Recommendations

---

## Introduction and overview

The Council's Equality Action Plan is a detailed document that reports on several actions taken since the Equality Review, notably the enhancement of the TAU and provision of Traveller-specific supports. The Council references various further planned actions to address areas of concern including working towards an equality policy, rolling out training on equality issues, and promoting understanding of the PSEHRD. These actions are a welcome response to recommendations of the Commission pursuant to the Equality Review and the invitation to complete an Equality Action Plan.

The Commission notes a lack of detail in the introduction to the Plan on the manner in which it was prepared. There is no detail on what, if any, consultation was engaged in in the course of preparation of the plan. It is not clear that the Council engaged meaningful and participatory consultation with relevant stakeholders in preparing the Plan and that such consultation informed the inclusion of actions designed to respond to the needs of Travellers.

There appears to be a lack of involvement of the LTACC both in respect of preparation of the Plan but also in respect of implementation of the actions going forward, and on wider engagement on Traveller housing. This is a concern.

At present, each broad action has a time period for completion, for example, quarter 4 of 2023 or ongoing. In several instances, these do not include measurable targets with a clear timeline attached. The Plan would be considerably strengthened by clearer time bound milestones and targets linked to each of the actions.

The introductory section states that delivery of the Plan rests with the TAU unless identified; no specific person is identified. The majority of the actions therefore rest with the TAU and this is a sizeable workload.

Notwithstanding any enhanced capacity of the TAU as referenced in the Plan, which in itself is welcome, the Commission is concerned that there is unlikely to be sufficient capacity within the TAU to action and track several actions, the majority of which appear to fall to that team to progress. In some instances, actions are to be done by the Council but

there is no specific staff member or team within the Council identified as responsible for the action.

In the Commission's view, this approach is not sufficiently prescriptive and does not ensure ownership and monitoring of progress of key actions, including in the area of equality. There is no indication of senior level ownership and oversight of the implementation of the Plan. There is no clear role for Travellers or their representative groups in respect of monitoring progress.

The Plan would therefore benefit from a column that clearly details who or which team head is responsible for progressing and reporting on each specific action, and a senior level oversight / reporting mechanism.

At present, the Plan states that regular updates on the implementation will be brought to the LTACC. Their role in its implementation, besides from that review, is not entirely clear. The functionality and capacity of the LTACC is also not clearly established. The Commission is concerned that this further reduces the engagement of Travellers in the implementation of the Plan.

The Plan would benefit from a clearer review mechanism and reporting structure so that progress towards achieving the actions can be measured at regular intervals, issues addressed as they arise, and the actions under the Plan aligned with other related activities and planning within the Council. As referred to above, clear and concerted Traveller participation in the implementation of the Plan appears to be lacking and in the Commission's view is a core component of its successful implementation.

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

The actions referenced in the Plan under this heading aim to improve the accuracy of the annual count/census of Travellers and their accommodation needs. There is a welcome commitment to using the ethnic identifier data and information on Traveller accommodation choices to inform the actions of the Council.

The Council's response evidences a recognition of the availability and value of this new data to inform service and accommodation provision to Travellers. There are, however, no metrics identified to measure and evaluate the impact of the proposed actions to promote

use of the identifier amongst Travellers. It is unclear whether the proposed actions were identified following consultation with Travellers and if, following from this, they are likely to have a positive impact.

There is a lack of detail on how any data collected will be used, to what end point, and by which departments of the Council. In the absence of such detail, there does not appear to be a clear pathway by which such data may be collated through engagement with Travellers and how it will inform decisions and policy on provision of Traveller accommodation delivery by the Council.

Overall there is no methodology identified or referenced by the Council for evaluating the existing count methods and no reference to coordination with any national bodies which may be considering this issue and with whom the Council could coordinate. There is a lack of detail on how Traveller groups would be involved in any such evaluation.

In the absence of a meaningful evaluation of the existing count methods either on its own or in conjunction with any national bodies, the Council may not be in a position to identify any shortcomings in the current methods and identify any actions to address these.

## **The work of the LTACC**

It is unclear what role, if any, the LTACC had in the preparation of the Plan. There is no reference to consultation and discussion with the LTACC in respect of that preparation, and that is a concern.

As a general comment and as mentioned above, the LTACC does not appear to have been allocated a significant role in implementing the Plan.

In terms of the effective functioning of the LTACC itself, the Council commits to regular meetings of the LTACC. The Plan sets out specific actions aimed at the empowerment and training of the members of the LTACC. These are welcome actions that are intended to support the functioning of the LTACC and allow for a meaningful role in decision-making on Traveller accommodation and service provision within the Council.

It is noted that the Council's website provides very little detail on the membership, meeting cycle, agendas and minutes of LTACC meetings. There is little substantive detail in the Plan on the functioning and decision-making of the LTACC currently. It is unclear if the Council has engaged with the LTACC and relevant stakeholders to identify any issues with

its current functioning and capacity, and to clearly identify and agree actions to address any issues identified.

The Plan would be strengthened by greater detail on the current issues arising with the functioning of the LTACC and how these were identified. The Commission considers consultation and engagement with Travellers and other stakeholders to be an important element of preparation and implementation of the Plan. Without such a process of consultation, it is difficult to assess whether or not the proposed actions will meet the needs of the LTACC and promote its effective functioning.

## **Accuracy and completeness of the TAP**

The Plan provides detail on the range and breakdown of data to be used in the TAP, and notably, this includes obtaining detailed and relevant information on the circumstances of Traveller households who have a housing need. The capturing of detailed information on the housing needs of Traveller households is an important part of ensuring that the TAP addresses the identified need.

Future family formations are of particular relevance. The Commission invites the Council to collate a range of relevant information, including data on future family formations, so it can properly plan for the housing needs of Travellers within its functional area.

There is a lack of detail in the Plan on the assignment of roles with respect of follow through on the TAP. There is no detail on the content or use of progress reports, other than that they will be given to the LTACC. Concerns regarding the functioning and role of the LTACC are set out above.

Such progress reports present an opportunity to ensure relevant stakeholders responsible for housing delivery within the Council have accurate and up to date data on which to base decisions on planning and delivery of appropriate housing and funding of same. More detailed actions in this regard would enhance the Plan and improve its prospects of impacting positively on the adequate provision and delivery of Traveller housing and services.

## **Provision of appropriate and accessible homeless services**

The Plan provides detail on a range of Traveller specific services to support homeless Travellers. This includes a welcome multi-disciplinary element that takes account of the range of supports that may be needed by vulnerable households.

The Council's plan to recruit a second social worker is a positive development.

The Commission understands that there is currently no TLO. The Commission would welcome consultation with stakeholders on creation of such a role, with consideration to be given to promoting employment of a Traveller in that role.

The Plan references actions on using data on Traveller homelessness, although these appear to be limited to presenting it to the LTACC on an annual basis. The Commission invites consideration by the Council of further actions that enable the use of data by other relevant departments in the Council in order to influence planning for future service and accommodation provision in the area of Traveller homelessness.

There is little information provided in relation to securing funding for emergency accommodation by way of replacement mobile homes, except for a reference to the TAU to work closely with DHLGH to draw down funding under the Caravan Loan Scheme. This lacks detail and precision.

The Plan does not include any action with respect of the provision of culturally appropriate homeless accommodation to Travellers who are experiencing homelessness. The Commission invites the Council's to consider and set out actions for the provision of culturally appropriate homeless accommodation to Travellers, noting that the Plan indicates that Travellers make up a large proportion of the homeless households in the Council's functional area.

The Plan does not make any reference to coordinating or aligning any of its action on Traveller homelessness with any national bodies. Such cooperation presents an opportunity to leverage financial and best practice resources to further develop the response of the Council on Traveller homelessness.

The Commission notes an absence of detail on any consultation with Travellers within the Council's functional area with regard to homelessness and related issues. Such consultation would enable the Council to gain an insight into what supports and method of

delivery of supports would enhance accessibility of Council housing services for Travellers. As referenced above, the employment of a TLO and a staff member who is a member of the Traveller community may be progressive steps that the Council could explore in consultation with relevant stakeholders.

## **Traveller participation in estate management**

The Plan references various tenancy support actions that are planned to support Traveller tenant participation. These include some measures designed to be accessible to Travellers. There does not appear to be any role for the LTACC in the identification of or implementation of these actions.

These actions may be impactful, but it is not clear that they have been identified following consultation with Travellers and therefore their suitability is not clearly established. Again, the Commission considers meaningful consultation as an essential step to ensuring effective and impactful outcomes.

There is reference to the TAU continuing to liaise with DHLGH with regard to funding for maintenance on Traveller specific accommodation. There are no clear milestones or specific steps identified with respect of securing of any funding to support work in this area. This is likely to undermine the likely success of such an action.

## **Promoting the practical implications of Traveller ethnicity**

The Council's enhanced TAU and provision of dedicated services in order to support Travellers are positive developments that aim to facilitate access to such services by Travellers. Staff continuity and building of relationships by the expanded TAU with Travellers in the Council's functional area are an important part to successful implementation of the Plan.

The Council's support of initiatives to promote diversity and social cohesion are noteworthy and contribute towards the aim of an inclusive community.

Again, however, the Commission notes an absence of detail on how the agreed actions were arrived at and what, if any consultation, was undertaken.



The Plan references various future planned actions of the TAU to engage with Traveller groups, but these are lacking in clarity and milestones, and as such, their impact will be difficult to measure.

The Plan references an equestrian project that Limerick Traveller horse owners will be encouraged to participate in. Appendix 5 provides information on the project which is being developed under the Limerick Regeneration Framework Implementation Plan 2014 – 2023.

The inclusion of an equestrian project in the Plan is welcome and has potential to promote an important aspect of Traveller culture.

There is, however, an information deficit in the Plan and Appendix 5 regarding the project. It is unclear what specific opportunities for engagement will be available to Limerick Traveller horse owners and the timeline within which any such opportunities will open up. This aspect of the Plan could be strengthened through provision of more up to date and detailed information on the project and the available opportunities for Limerick Traveller horse owners. Again, consultation with the Limerick Traveller horse owners on the accessibility and suitability of the project appears to be lacking and would strengthen this aspect of the Plan.

## **Provision of transient halting sites**

The action contained in the Plan to have open discussions with all Traveller groups in the county in the course of developing the next TAP is welcome, but there is a lack of detail on the format and process of such open discussions to ensure accommodation preferences are ascertained.

Reference is made to special circumstances in relation to transient halting site provision in Rathkeale, but there is little detail on how the specific provision will be effected and the timeline for same.

The Plan makes welcome reference to the work of the Programme Board with the Housing Agency and the Northern Ireland Housing Executive with respect of provision of transient sites. There is, however, a low level of follow up commitment in that the Council commits that the report will be considered, when produced.

## **Provision of a Caravan Loan Scheme**

The Commission is disappointed to note the very low take up reported on by the Council of the pilot Caravan Loan Scheme, such that over a three-year period, only three caravan loans were provided with a financial commitment of just over €100,000.

It is also disappointing to note that no evaluation of the pilot appears to have been undertaken by the Council and that the Council is referencing evaluation at this stage, and only with recourse to DHLGH which is evidently creating further delay in any reform of the Scheme.

The Council's planned actions with respect of any Caravan Loan Scheme suggest that its role is only as a conduit of funds for the DHLGH. There is a lack of commitment to the supporting and improving any Scheme or considering alternatives to it. For example, there are no clear actions that intend to strengthen the availability and accessibility of any Caravan Loan Scheme to Travellers in the functional area of the Council, or to consider its overall suitability as a Scheme.

It is unclear if the Council engaged in consultation with the LTACC, Travellers and representative groups on the need for the Caravan Loan Scheme and operation of the pilot scheme. This is a significant shortcoming.

## **TAP provision for Travellers on the roadside or on unofficial sites**

The Plan reports on its engagement with Travellers who are residing on the roadside or an unofficial site. There is no action referenced with respect of the mid-term review of the TAP. There is no reference to any evaluation of decisions on social housing applications from Travellers who are residing on the roadside or on unofficial sites, and as such there is no consideration of addressing any potential discriminatory treatment arising. The commitment to continue to track and assess Traveller families parked on the roadside or unofficial sites appears to fall short of addressing the issue raised in the invitation by the Commission to prepare and implement the Plan.

## **Introduction of the ethnic identifier**

The Plan has proposed welcome actions on awareness raising by the TAU in respect of the ethnic identifier and related Traveller accommodation choice form. It is not clear, however, that these actions have been identified following consultation with Travellers and representative groups. Consultation is an important preliminary step to ensuring any actions are relevant and likely to be impactful.

The Plan would benefit from clearer and more time-bound actions with respect of use of any captured data to ensure it is relied and used in the planning and delivery of housing and services by the Council more broadly.

## **Engagement with Traveller community in accessing services**

As detailed above, the Council's enhanced TAU and provision of dedicated services in order to support Travellers is a welcome development designed to assist in improving access to such services by Travellers. Continuity of staff and fostering of positive and constructive relationships with Travellers and representative groups will be an important aspect of the work of the enhanced TAU.

The Plan would be strengthened by further detail on how the agreed actions were identified and what, if any consultation, was undertaken.

The increase in supports through an enhanced TAU has resource implications and it would be helpful to have an indication that such enhanced supports are sustainable, with reference to budget committed and secured.

While there are some feedback and consultation pathways included in the Plan, there is no structured mechanism for the TAU to feed back to Council members on a regular basis and the Plan would be strengthened by such a pathway.

Again, there is little role for the LTACC provided for under this heading although a need for training of members to improve participation is noted. As referenced above, it is unclear if the reasons for any lack of participation have been identified through any evaluation of the functioning of the LTACC and consultation with its members and the wider community. Such information would likely strengthen the impact of any planned action.

## **Recording of data on allocated funds**

The Plan details how the Council plans to report on expenditure. This includes annual reporting on the breakdown of expenditure on various aspects of Traveller specific housing including on refurbishment of Traveller specific accommodation, and construction and acquisitions. The Council proposes to provide this information to the LTACC and the Home and Social Development SPC. This reporting provides greater clarity on the specific draw down and allocation of funds as it relates to Traveller specific accommodation. The inclusion of financial detail on refurbishment, as distinct from new Traveller accommodation, is particularly welcome.

It would be helpful if there was clarity in the Plan as to whether or not this information will be publically available for greater transparency and accessibility of relevant information. The information does not appear to be available or easily accessible on the Council's website.

It is noted that the annual reports do not propose to include data for the expenditure on general accommodation for all housing applicants and this would be a relevant comparator to have available.

The Plan does not include any actions on procedures to enable the Council to take account of the true housing preferences of Travellers whose accommodation needs are met through general housing funds and of the varying costs of different forms of accommodation. Such actions would ensure that the data informs decision-making and influences future provision.

## **Operation of new procedures pursuant to Circular 03/2020**

It is unclear if any steps have been taken or are planned to assess the effectiveness of the new procedures pursuant to Circular 03/2020. This is a notable gap in circumstances where the Circular was introduced to streamline funding drawdown.

While there is reference in the Plan to regular meetings with DHLGH on funding requirements, it is not clear if these are to include discussion of the operation of the new procedures and include discussion of evaluating and improving same.

The Plan references an action to meet regularly with “*identified families*” to secure agreement on projects. It is unclear on what basis such families have been identified and to what projects discussion relates. It is therefore not possible to identify what issue this action seeks to address as it is lacking in detail.

## **Addressing delays in delivery of Traveller specific accommodation**

The Council reports on steps taken to address delays in delivery of Traveller specific accommodation provision and refers to organisational structural changes. It also reports on progress with the capital programme as set out in the Equality Review, which indicates some headway in delivering on existing programmes. Such progress is welcome. The appointment of a new Executive Engineer to work solely on Traveller accommodation is also a progressive development. Their retention and ongoing engagement with Travellers will be important part of their overall impact.

Notwithstanding this progress, there is no reference to learnings or consultation with stakeholders on the reasons for previous delays in delivery of Traveller specific accommodation and issues arising.

There are few metrics referenced in the Plan under this heading. Such metrics would assist in assessing any improvement in delivery of Traveller specific accommodation and reducing delays or difficulties in completion. Measuring the impact of the Plan would be enabled by the inclusion of clearer deliverables.

The Plan has not committed the Council to engaging of an independent body to assess the reasons for delays and/or non-completion of projects. This appears to be a gap, particularly in circumstances where the Council does not detail its own consultation and identification of identifying reasons for same. The Council intends to keep the possibility of engaging an independent body under consideration, pending progress on projects by the Council and CENA. The Commission again recommends that the Council proceed with engage an independent body as proposed in the recommendations of the Commission pursuant to the Equality Review.

## **Accommodation needs of Crescent Halting Site residents**

The Plan reports on the steps taken and planned with respect of meeting the accommodation needs of the residents of Crescent Halting Site.

Regrettably, since the Equality Review, there appears, from the information contained in the Plan, to have been little progress in addressing and meeting the accommodation needs of the residents. There is reference to the engagement going forward of the TAU with the residents, and reference to CENA being requested to:

---

“source appropriate accommodation for the residents”.

---

The Plan does not include any clear articulation of any underlying reasons for the lack of progress with respect of the site. It is noted that the Equality Review referenced the Council’s view that changing preferences was the source of delay. There is no reference in the Plan to any consideration of the reasons for changing preference or any other factors that may impact on delay. If these reasons were properly identified, it appears that there would be scope to address them through actions contained within the Plan.

Overall, there appears to be a lack of focus and impetus in the specified actions that should be designed to meet the housing needs of the residents at this Halting Site. There is no clear timeline within which the Council intends that residents’ housing needs would be met. This is of concern to the Commission noting the long-standing housing need that appears to remain unmet.

## **Response to and implementation of the Equality Review and related recommendations**

The Plan references completion of two housing projects identified in the Equality Review, specifically Kilmurry Halting Site which is stated to be complete, and Clonlong Halting Site where phase 1 is stated to be complete. It is noted that Kilmurray Halting Site constituted a refurbishment for which the funds were allocated in 2017. The project evidently faced delays in completion and the reasons for this are not articulated, considered or addressed in the Plan.

As referenced above, the Commission considers there to be value in identifying the reasons for delays and addressing them robustly through clear actions, so as to improve

the timeliness of delivery in other projects and more broadly to ensure the housing needs of Travellers are met in a more timely manner.

## **Organisational equality arrangements including equality policy and training**

The Plan commits to including an equality statement in the forthcoming TAP and in its Allocations Scheme which are positive developments and indicative of a willingness to improve organisational equality arrangements.

There is reference in the Plan to an existing equality policy but this does not appear to be available or easily accessible on the Council's website.

The Commission's account of the Council's Equality Review included the following recommendation:

---

"Adopt a broad equality policy incorporating discrimination on all prohibited grounds and all staff should receive training on this policy."

---

This recommendation is not squarely and fully addressed in the Plan. This is regrettable given that, in the view of the Commission, adoption of such a policy is an important and achievable recommendation.

The Plan does, however, make reference to the work of an in-house group set up to review the existing organisational policy and states that the review will incorporate organisational equality arrangements and make recommendations. There is no timetable for such action and no indication that the end point will include an overall equality policy. Clarity and detail on these aspects would be welcomed by the Commission and would strengthen this aspect of the Plan.

The Plan indicates that the Council has carried out research on procurement of a professional equality specialist to review all Council services. The Plan proposes engaging such an expert. Again, such an action lacks milestone steps including consultation on the content of equality training, and method and timeframe of delivery.

Provision of equality training to all members of the LTACC, the completion of the IHREC e-training and engagement of an external trainer on quality by TAU staff are welcome actions contained in the Plan.

It is noted that several of the training aspects are outside the remit of the TAU, yet there is no clear ownership of the actions by a specific staff member or team. The Commission believes clearer ownership of specific actions would improve the likelihood of the actions being followed through.

There is a lack of detail in respect of the action to improve communication with Traveller groups. Constructive engagement with Travellers and their representative groups in the Council's functional area is an important aspect of preparation and implementation of the Plan, and provision of appropriate and accessible Traveller accommodation and services overall. It is noted that there are references both in the Equality Review and Plan to the need for improved communication but there are no clear measureable actions to address this. The Commission strongly recommends greater focus and clear actions in respect of such aspects.

## **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, strategy, programme or service and making a key decision public bodies would have regard to the PSEHRD.

The Plan does not demonstrate that the Council has had full and due regard to the PSEHRD. There is no clear evidence of consideration of the PSEHRD in the Plan. The Plan does not clearly indicate or identify the equality and human rights issues that are or may be experienced by Travellers with regard to the functions of the Council, particularly Traveller accommodation services. These may be identified pursuant to an assessment process carried out by the Council as part of its wider PSEHRD implementation or specific to the TAP. There is, however, no reference in the Plan to such implementation.

The Plan does not include a commitment to carry out such an assessment and/or consultation with Travellers and/or Traveller representative groups. As such, the actions/objectives of the Plan are not clearly linked to evidence-based issues impacting on Traveller access, engagement with and availing of the services of the Council.

In the view of the Commission, the Plan should be informed by equality and human rights issues that are or may be experienced by Travellers regarding access to, engaging with and availing of the services of the Council, with specific focus on Traveller accommodation. The actions outlined in the Plan are not aligned to or referenced to an assessment of equality and human rights issues or in consultation with Travellers and/or Traveller representative groups. Such engagement is a key starting point to overall compliance with the PSEHRD.

With respect of the specific actions referenced in the Plan that refer to PSEHRD, the Commission notes the Council's proposal to provide training to raise awareness of the PSEHRD for designated housing staff and for elected members. The Commission welcomes proposed actions to use existing guidance and tools to implement the PSEHRD. The Commission invites the Council to integrate such actions into a wider programme of actions that will ensure overall compliance with the PSEHRD, which is a statutory obligation of the Council.

Furthermore, the Commission notes a gap in the Plan in that there are no actions referenced to ensure the application of the PSEHRD in the preparation of the TAP, the assessment of housing applications and allocations, and assessments with respect of

access to homeless accommodation. Further, there does not appear to be a staff member or team charged with leading on these actions and this is likely to impact on follow through.

## 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 Council's considered actions, in particular the more innovative steps such as the engagement of an engineer to work specifically on Traveller accommodation and its intention to engage outside experts for training inputs and support.

The Commission is concerned at what appears to be a lack of consultation and engagement of Travellers in its preparation and implementation of the Plan. This is a crucial element to any Plan that is to be impactful and relevant, and is a critical part of compliance with the PSEHRD.

The Commission notes a lack of detail on what financial resources will be available to support implementation of the Plan. It is crucial that any resource implications are fully considered.

The Commission would welcome greater focus on the role and inclusion of the LTACC, and a renewed focus on delivering on outstanding Traveller accommodation projects with reference to reasons for past delay and learning from previous difficulties.

The Commission would welcome greater specificity in respect of several of the actions, and a clearer indication of which staff member or team is leading on each of the actions and a clearer timeline within which they are to be complete.

## 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 enable accurate capturing of multiple accommodation preferences of members of the Traveller community within the Council's functional area;
  - iv. to ensure that any additional and relevant information that will impact on accommodation planning and/or delivery is properly captured in the count/census; and
  - v. 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, with regard to the work of the the LTACC, including:
  - i. to empower the members of the LTACC and promote the accessibility of the forum as a 'safe space';
  - ii. to promote Traveller engagement, participation and representation on the LTACC; and
  - iii. to promote learning of the LTACC members, for example, through proposed field trips to view capital works ongoing throughout the county.

- c. 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 its accuracy and completeness, in particular ensuring it includes 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. the process to identify Traveller accommodation needs and preferences for the purposes of the TAP;
  - iii. details of the specific accommodation needs and preferences of Travellers in the functional area of the Council, and
  - iv. 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.
- d. Please clarify the steps taken to date, or planned, to promote access to appropriate services to Travellers presenting as homeless in the functional area of the Council, and the culturally-specific responses to the needs of that cohort, including:
- i. the provision of data on the numbers of Travellers presenting as homeless in the functional area of the Council and uses of that data to address and respond to such homelessness;
  - ii. the securing of funding for an accommodation worker to work with Travellers at risk of or experiencing homelessness;
  - iii. the availability of funding and draw down for emergency accommodation by way of replacement mobile homes;
  - iv. 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;
  - v. 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
- vi. 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.
- e. Please clarify the steps taken to date, or planned, regarding Traveller participation in estate management, to include:
- i. the securing of funding and the appointment of an estate management officer in the Traveller Unit;
  - ii. the securing of additional funding to support the maintenance of Traveller-specific accommodation; and consultation with Travellers within the functional area of the Council and their participation in relation to estate management functions and the responses of the Council.
- f. 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 horse-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.
- g. 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 functional area of the Council 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. the provision made and maintained in relation to transient sites with regard to Rathkeale; 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.
- h. Please clarify the steps taken to date, or planned, to strengthen the availability and accessibility of the Caravan Loan Scheme (the 'scheme'), including details of:
  - i. the current status and form of the scheme, noting the terms of the pilot scheme in operation as of July 2021;
  - ii. expenditure under the pilot scheme;
  - iii. the number of applicants to 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 pilot scheme;
  - iv. any evaluation(s) undertaken of that 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 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 scheme;
  - vii. any consideration of the 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.

- i. Please clarify the steps taken to date, or planned, to address inclusion of provisions in the TAP relating to applications from members of the Traveller community who are residing on the roadside or an unofficial site and to ensure the provisions are not discriminatory and are consistent with the statutory framework that applies, including:
  - i. the assessment of the provisions in the course of the mid-term TAP review;
  - ii. the amendments to the provisions in the TAP pursuant to the mid-term TAP review and any other process; and
  - iii. any evaluation(s) of decisions on social housing applications from members of the Traveller community who are residing on the roadside or on unofficial sites, and any assessment and addressing of any discriminatory treatment arising.
- j. 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. the collection and analysis of this data by the Council; and
  - iii. the use of the data to strengthen and inform decision-making including in relation to spending on provision of Traveller-specific accommodation and related services.
- k. 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 any other information on the role and duration of appointment;
  - ii. provide for feedback mechanisms, such as regular meetings, between any Traveller Liaison Officer and members of the Council mandated with housing issues;
  - iii. provide for the evaluation of the effectiveness of any appointment of a Traveller Liaison Officer;
  - iv. enhance the accessibility of service provision to members of the Traveller community, for example, by way of drop-in 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; and
- v. provide avenues for members of the Traveller community to directly voice any concerns they may have in respect of their accommodation and related issues.
- l. 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.
  - m. 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 draw down 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.
  - n. Please clarify the steps taken to date, or planned, regarding delays in delivery of, or improvement to, Traveller-specific accommodation provision at sites in the functional area of the Council, including:
    - i. engaging an independent body to assess the reasons for delays and/or non-completion and/or discontinuance of new build and/or refurbishment projects at halting sites in the Council's functional area;
    - ii. the evaluation of such assessments and changes implemented on foot of findings of such assessments; and
    - iii. the publication of such independent reports.

- o. Please clarify the steps taken to date, or planned, to meet the accommodation needs of the residents of the Crescent Halting Site pursuant to recommendations of CENA in its report of 5 November 2019.
- p. Please clarify the steps taken to date, or planned, regarding the mechanisms used by the Council to ensure implementation of the Equality Review and related recommendations and proposed actions.
- q. 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 engaging of a professional equality specialist organisation to carry out a review of all housing services;
  - ii. the development and implementation of an equality policy;
  - iii. the inclusion of an equality statement in the TAP;
  - iv. the inclusion of an equality statement in the Allocations Scheme; and
  - v. learning and improvement of standards within the Council.
- r. 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).





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