

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



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



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Glossary

1998 Act: Housing (Traveller Accommodation) Act 1998

2009 Act: Housing (Miscellaneous Provisions) Act 2009

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

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

2014 Act: Irish Human Rights and Equality Act 2014

AHB: Approved Housing Body

AO: Administrative Officer

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

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

CBL: Choice Based Lettings

CDP: Community Development Project

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

CLO: Community Liaison Officer

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

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

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

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

ESA: Equal Status Acts 2000 - 2018

HAP: Housing Assistance Payment

HAO: Housing Assessment Officer

HLO: Housing Liaison Officer

HNA: Housing Needs Assessment

HWO: Housing Welfare Officer

LGMA: Local Government Management Agency

LTACC: Local Traveller Accommodation Consultative Committee

NTACC: National Traveller Accommodation Consultative Committee

RAS: Rental Accommodation Scheme

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

SEO: Senior Executive Officer

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

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SICAP: Social Inclusion and Community Activation Programme

TAER: Traveller Accommodation Expert Review, July 2019

TAO: Traveller Accommodation Officer

TAP: Traveller Accommodation Program

TAU: Traveller Accommodation Unit

TIF: Traveller Inter-agency Forum

TIG: Traveller Inter-agency Group

Introduction

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

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

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

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

The Council submitted its initial Equality Review response to the Commission on 09 October 2019. Following consideration of the Council's response, the Commission sought clarifications by letter dated 24 April 2020, which were provided by the Council by letter dated 18 June 2020.

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

It comprises three sections, namely:

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

Section 1 Key areas of interest

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

The Council states that the membership of the Cavan LTACC comprises of 12 members with four local authority members, four Traveller representatives and four local authority officials. The Council states that Cavan LTACC plays an active and pivotal role in both the preparation and implementation of the TAP in County Cavan. The Council states that it was agreed that, prior to the December 2019 meeting of LTACC, specific training would be provided for members of the committee. The LTACC meets on a quarterly basis and liaises with local agencies who represent Travellers, for example the Cavan Traveller Movement and Breffni Integrated.

The Council states that all staff employed in its Housing Department are involved in the implementation of the TAP. This includes technical and administrative staff, assessment staff, Tenant Liaison Officers, staff dealing with rents or anti-social behaviour, the Homeless Social Worker or the Tenancy Sustainment Officer provided by Dublin Simon Community. The Council states that there is ongoing individual contact with Travellers by housing officials in respect of accommodation needs as and when required.

The Council states that it delivers tenancy training and supports for Traveller families when required. Together with this, the services of the Tenancy Sustainment Officer are available to tenants assessed with specific needs. A full time social worker employed by the Council is also available to provide ongoing support to Traveller families.

The Council states that it carries out an assessment of need annually and the accommodation needs of Traveller families are part of this assessment, which then informs the TAP. Based on consultations with Travellers, the accommodation need identified in the assessment of need for both the 2014-2018 and the 2019-2024 TAPs was predominantly for standard social housing, provided by either the local authority or an AHB or RAS, according to the Council.

The Council confirms that, regarding its scheme of letting priorities, members of the Traveller community may avail of both the standard housing list and Traveller-specific housing. The Council states that it aims to respond to the different needs of Travellers using the full range of social housing supports and various forms of social housing delivery. The full range of social housing supports available are listed as including standard social housing, group housing, units provided by an AHB, the RAS, the HAP Scheme and the Rebuilding Ireland Scheme.

When allocating properties, the Council states that it will have regard to the provisions of the allocation scheme, estate management issues, an appropriate social mix within areas, compatibility of families, anti-social behaviour and house size requirement. Family circumstances including health, family size, length of time in district, family history in an area, integration into that area etc. will also be taken into account. Separate waiting lists do not operate for the Traveller community.

According to the Council, loans under the Rebuilding Ireland Scheme are available to Travellers who wish to provide their own accommodation subject to the normal terms and conditions of the scheme. Special needs dwellings and older person dwellings are allocated to housing applicants based on their specific needs. Traveller group housing is provided, within the available resources of the Council, to members of the Traveller community who have requested and agreed to be accommodated together.

The Council states that Traveller individuals or families can also avail of the homeless services available in the Council should they find themselves homeless or at risk of homelessness. A full homeless assessment will be completed by the Council's social worker.

In terms of future need, the Council sets out its predictive methods. An analysis of the 44 households identified as requiring long-term housing solutions indicated that 24 children will reach the age of 18 during the lifetime of the TAP. An analysis of the tenant household profiles indicated that an additional 38 children will reach the age of 18 during the period, leading to a total of 62 additional adults in the county. The numbers identified as in need of social housing support in each of the three previous years in the

Annual Traveller Count were 68 in 2015, 63 in 2016 and 49 in 2017. This, according to the Council, demonstrates a decline in household need each year.

Based on the age profile, the Council deemed it reasonable to provide for an additional 30 Traveller households over the five-year period. While, according to the Council, it has not been possible to establish the type of accommodation preferred for this group, it envisages, based on the previous findings that the majority of preference is for standard social housing support.

B. Comparison of funding to comparator group

The Council sets out that the annual estimate of Traveller families, completed on 28 November 2018 as part of the TAP 2019-2024, identified 144 Traveller households residing in County Cavan (100 in forms of social housing and 44 households who are either residing in private rented accommodation or are sharing with relatives and require a long-term housing solution).

The Council states that of the 44 households requiring a long-term housing solution, all have identified standard social housing only as their preferred option to meet their accommodation requirement.

According to the Council, the assessment of the accommodation needs of Travellers did not identify a need for a permanent halting site in the county, nor did it identify any demand for the provision of a transient site in the county. Notwithstanding this, the Council reports that two substantial capital investment programmes were undertaken in 2016 and in 2018 to improve the existing facilities in place at Traveller group schemes in Townsparks, Cavan and at Pottleboy, Cootehill – these included the erection of barriers and electrical works as well as the replacement of 17 oil tanks and 14 boilers.

For the period from 2015 to 2018, in respect of capital funding for Traveller-specific accommodation, the Council asserts that €13,729 had been drawn down as of October 2019 (reflecting the figure allocated in 2016) and a further €94,500 was due to be drawn down over the following weeks (reflecting the figure allocated in 2017), which would amount to a total draw down figure of €108,229, equal to the sum allocated.

Capital expenditure on Traveller-specific accommodation for 2019 was stated by the Council to be non-applicable and reference was made to Table 3 in its review, on capital spending for general housing.

No distinct figures were provided in respect of current expenditure for Traveller-specific accommodation over the same period, but reference was made to Table 4 of its review, which set out current expenditure in respect of general housing, suggesting that current spending was combined between Traveller-specific accommodation and general housing.

In respect of annual capital expenditure for general housing from 2015 to 2018, the Council reports that the total budgeted cost amounted to €18,030,857. The total sum drawn down amounted to €16,924,195.

In respect of current expenditure for general housing over the same period, it was stated by the Council that the total allocated sum came to €178,567, reflecting the total figure for sums drawn down. Current expenditure was described as 'caretaker wages and general maintenance'.

While the figure for capital expenditure for general housing was considerably higher than that for Traveller-specific accommodation, it is difficult to compare these in a meaningful way without figures for the respective populations of the Traveller community and settled community in Cavan.

According to the Council, funding is made available by the DHPLG for the provision of housing under the SHCIP and allocates funding for social housing capital projects, acquisition of houses, including those acquired under Part V, and Compulsory Purchase Orders.¹ All such housing provision is subject to the availability of funding. The DHPLG provides separate funding for the provision and refurbishment of Traveller-specific

¹ Part V of the Planning and Development Act 2000 allows a local authority to require developers to set aside a certain proportion of new developments for social or affordable housing. The percentage of land that must be provided for social and affordable housing in a housing development was reduced to 10% - from 20% - under the Urban Regeneration and Housing Act 2015.

accommodation and such projects are subject to the availability of funding from the Department.

In terms of the process for applying for social housing, the Council reports that the Administration Section works in tandem with the Housing Capital Office, whose responsibility it is to deliver targeted programmes to meet the social housing need in the county. Meetings are held at least monthly and more often if necessary. The multi-annual targets are agreed with the Department under the Rebuilding Ireland Scheme and a variety of mechanisms, e.g. direct build, turnkey, acquisitions, etc., are used to meet the targets. The different stages in the process, which are time bound, are contained in the different Circulars which have been issued by the Department. The Council states that the procedures and practices for making applications for funding, monitoring, reporting progress and recouping monies are contained in the Circulars and the process in the Council's office reflects this. Progress is reviewed and reported monthly to the Department and this is published by the Department at www.rebuildingireland.ie.

In addition, the Council advises that the Capital Office meets with the Department twice yearly and is in continual contact with their staff to deliver units.

C. Adequacy of funding

The Council states that it has been in a position to provide the housing requirements for Traveller families through social housing and has maintained existing Traveller group schemes through ongoing remedial works, using funding drawn down from the Department.

In a letter of 18 June 2020 providing further clarification, the Council sets out a table in respect of social housing needs in 2019. This shows that its target was 73 and total delivery was 103, which amounted to a percentage delivery of 141%.

In respect of existing Traveller group schemes, the Council cites that improvements to the Traveller group scheme dwellings were identified and this work was carried out under the Traveller-specific support programme. A need has been identified for two extensions, one to alleviate overcrowding and the other to meet the specific needs of a

child. According to the Council, plans and costings were, at the time of the review, being prepared to enable it to seek funding from the Traveller-specific programme. It states that this will be done in accordance with the recent Circulars issued by the DHPLG.

D. Whether all funding allocated drawn down

The Council asserts that all allocated funding was drawn down and so there have been no adverse effects on the provision of Traveller accommodation owing to failure to draw down allocated funds and the needs of Traveller families have been met in keeping with both the Council's current and previous TAPs.

E. Any further issues of equality of opportunity

The Council has recommended that the Public Sector working group, which has been set up within the Council, engage with the Traveller representative(s) from the LTACC and, as part of their work plan for the next 12-month period, to include a specific workshop around Traveller accommodation needs and supports. It states that findings and recommendations from this workshop could be incorporated into the Customer Service Charter and feed into Housing Departments Annual Business Plan.

Section 2 Issues arising

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

The Equality Review process

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

LTACC

The Council describes the LTACC as having:

“an active and pivotal role in both the preparation and implementation of the Traveller Accommodation Programme”.

It is noted that there are four Traveller representatives on the LTACC. The Council provides no detail regarding the process by which Traveller representatives are appointed onto the LTACC, or of a process by which they can have accountability back to the wider local Traveller community. The review notes that ‘specific training will be provided’ to the LTACC, however, no detail is given as to the proposed aims of this training.

Accommodation services and supports offered by the Council

The Council states that it offers general accommodation services to all, including members of the Traveller community, such as the services of a Tenant Liaison Officer, a Tenant Sustainment Officer, a Social Worker and tenancy training. The Equality Review also states that two caretakers are employed for the operation and maintenance of Traveller-specific accommodation and to ‘ensure the proper management and maintenance of accommodation’. The Equality Review does not report any tenant participation in estate management initiatives. The Council’s Tenant Sustainment Officer is ‘available to tenants assessed with specific needs’ and its Social Worker is ‘also available to provide ongoing support to Traveller families’. However, the review offers no detail in regard to how these generic supports take account of the

specific needs of the local Traveller community, arising from their cultural and ethnic identity and having regard to the specific barriers this community experiences in accessing accommodation and other key services.

There is no detail provided by the Council regarding the types of outcomes for Travellers engaging with this tenancy training and support, Travellers' experiences of these supports, and, in particular, how these supports are deployed to work with Travellers to assess their accommodation preferences and to support delivery of targets in regard to Traveller-specific accommodation.

The Equality Review identifies that the Council will make use of private rented accommodation, supported through the HAP Scheme, in making provision for Travellers. There is further reference to access to the RAS. The current TAP refers to the availability of support from the Tenancy Sustainment Officer. However, there is no reference made to the specific difficulties faced by Travellers in this sector, in particular that of discrimination.

The Equality Review states that Travellers can avail of the homeless services available should they find themselves homeless or at risk of homelessness. There is no reference to any specificity in Traveller experience of homelessness or of any account of cultural difference being taken in the services provided.

Assessment of need

Furthermore, the Council does not have robust systems in place to capture and record the accommodation needs of members of the Traveller community. For the purposes of ensuring equality of access to accommodation services to Travellers, transparent methods of collection and recording of data are crucial. The Council states that it conducts an annual survey of members of this community. It also states that the 2014-2018 and the 2019-2024 TAPs demonstrated a general trend in terms of accommodation need among members of this community towards standard social housing. However, the method for the collection of this preference was not clear. Future need was assessed on the basis of present figures, with the added calculation of children who would reach the age of 18 during the lifetime of the TAP.

In its Equality Review and current TAP, the Council states that, of the 44 Traveller households identified as currently requiring social housing supports, all have expressed a preference for standard housing. In regard to an additional 30 families that are projected to require social housing supports over the course of the current TAP, the Equality Review notes that:

“it is envisaged based on the previous findings above that the majority of preference (for this group) is for standard social housing support”.

It is noted that the TAER found that recording snap-shot or historical data on existing accommodation did not equate to an accurate record of accommodation preferences.

Regarding the delivery on the 2014-2018 TAP targets, the current TAP advises that of the target of 46 families, 45 families had been granted tenancies as of October 2019 (43 by the Council and 2 by an AHB).

Provision of Traveller-specific accommodation

Four families requested Traveller group housing but they could not be offered this accommodation preference, as the Council is not providing new units of group housing: families stating such preferences can, therefore, only be accommodated where vacancies in such provision arise.

The current TAP notes that:

“identification of suitable sites for provision of Traveller Group Housing continues to be a challenge”.

This issue, however, is not raised in the Equality Review.

Aside from group housing, there is no halting site or transient site provision in the Council’s administrative area and, as outlined above, the current TAP advises that there is no identified need for such provision. In this context of: no planned new group housing provision (and some overcrowding reported in current group housing provision); and no current or planned halting site provision, it would appear that the only viable option available to Traveller families is to opt for standard housing. This raises

the question of whether preferences are in fact true preferences. However, the issue of preferences is not addressed in the Council's Equality Review. There is no independent verification process identified in relation to the preferences and no tracking of these over time reported in the TAP or the Equality Review. Some members of the Traveller community may perceive a lack of Traveller-specific accommodation or are exasperated by overcrowding or poor hygiene conditions on halting sites and for this reason, feel they have no choice but to apply for social housing.

The 2014-2018 TAP references research conducted by Cavan Traveller Movement that found that:

"a number of Traveller applicants would opt for Traveller Specific Accommodation rather than Standard Housing preference which was recorded in the recent Housing Needs Assessment".

This raises further concerns as to the accurate establishing of Traveller preferences.

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

Implications of current housing policy

There is no analysis of the practical implications of cultural diversity for the general provision of social housing to Travellers, or reference to initiatives to develop and sustain integrated diverse communities on social housing estates. This is of concern, given the significant numbers of Travellers opting for such provision. The 2014-2018 TAP goes on to commit that:

"[i]f this trend materializes during the lifetime of the programme, options such as the provision of Voluntary Housing or the purchase or lease of housing specifically for Travellers will be progressed subject to Department approval and funding provision."

There is no further reference to this issue in the current TAP or the Equality Review.

The Council determined that the assessment of the accommodation needs of Travellers did not identify a need for a permanent halting site in the county, nor did it identify any demand for the provision of a transient site in the county. The Council nevertheless undertook two substantial capital investment programmes, in 2016 and in 2018, to improve the existing facilities in place at Traveller group schemes in Townsparks, Cavan and at Pottleboy, Cootehill. Given the imperative to respond to the needs arising from cultural difference and the potential importance of transient sites to the nomadic tradition of the Traveller community, it would have been relevant to include some detail in the Equality Review on the Council's decision not to provide transient sites.

Draw down of funds

The financial data provided by the Council indicates that between 2015 and 2018 it did not request any funding allocation for capital expenditure on Traveller-specific accommodation, in 2015, 2017, or 2019. From an examination of TAP, the reason for the low level of funding requested appears to be a result of decisions not to build additional group housing units, nor to provide permanent or transient halting site provision in the administrative area.

Given the very low level of funding requested by the Council for capital expenditure for Traveller-specific accommodation between 2015 and 2018 (€105,500 compared to €16.9m spent in the same period on its general housing capital projects), it is of concern that 90% of the Traveller budget was not drawn down by the Council.

In 2016, €14,000 was requested and drawn down, for capital expenditure on Traveller-specific accommodation, and in 2018, €94,500 was allocated, for replacement of oil tanks at the two Traveller group housing schemes, however, this money was not drawn down 'due to restrictions'. There is no further detail given as to what these restrictions were. Further information on the lack of financial detail provided by the Council is discussed further below.

Generally, funds allocated by the DHPLG were equal to the sums drawn down for Traveller-specific accommodation. However, as the Council envisaged no future need for new halting sites and a full transition to standard housing, there was no application

for an allocation from the DHPLG in 2019. No figures were provided for current expenditure on Traveller-specific accommodation, but instead it was indicated that current expenditure on behalf of members of the Traveller community was entirely comprised in current expenditure for general housing. Funding for general housing expenditure was sourced from a variety of schemes including SHIP. In terms of delivery to cover social housing need, the Council recorded a 141% delivery in 2019.

The Council was asked to confirm the amount of funding in respect of the provision of Traveller-specific accommodation that was applied for in 2019: this information was not provided.

Furthermore, the Council submitted incomplete information on its funding allocation and drawdown. Following a request to the Council by the Commission for further information, the additional data provided by the Council does not adequately address this information gap.

In compiling financial data for this review, the Council use the financial template developed by the Local Government Management Agency, to support local authorities to undertake the review. The financial template includes a table (Table 2) requesting details of the expenditure relating to ongoing maintenance and upgrading of Traveller accommodation for each year 2015-2018 (outside of capital expenditure, which is captured in Table 1). The data supplied by the Council does not include any detail in Table 2, but instead refers the reader to Table 4. Table 4, however, refers to

“all non-capital expenditure on housing costs less the amount spent on Traveller accommodation (e.g., RAS, Leasing Programme, HAP and Maintenance etc.)”
(emphasis added).

In compiling Table 4, the Council present yearly expenditure regarding ‘Caretaker wages and general maintenance’ which, it is assumed refers to maintenance on all of its housing stock, not solely Traveller accommodation. It is not possible, therefore, to determine how much, if any, of this maintenance expenditure relates to Traveller accommodation.

Public Sector Equality and Human Rights Duty

There is no specific reference to the statutory obligations of the Council under S42 of the IHREC Act 2014: the Public Sector Equality and Human Rights Duty, in the current TAP or the Equality Review. The Council's plan is welcome, to have its Public Sector working group engage with the Traveller representative(s) from the LTACC at a specific workshop concerning Traveller accommodation needs and supports, in order to make findings and recommendations to be incorporated into the Customer Service Charter and to feed into the Housing Department's Annual Business Plan. It is unclear, however, if this working group is a Public Sector Duty working group. This could be a forum in which the accommodation preferences of members of the Traveller community and their underlying reasons could be discussed, in addition to adequately addressing existing and possible future overcrowding at existing halting sites. While this is a useful recommendation, it is unclear why this engagement is suggested as being limited to the Traveller representatives of the LTACC.

Section 3 Recommendations

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

1. Address policy and procedure for:

- presenting data in the TAPs and progress reports, in particular: providing detail on the process for assessment of Traveller accommodation needs and preferences in the administrative area;
- tracking and independently verifying the preferences of the Traveller community in relation to type of accommodation and ensuring a respect for Traveller culture and identity in meeting these;
- establishing appropriate processes for Traveller participation in estate management on Traveller-specific accommodation;
- identifying and responding to the practical implications of the recognition of Traveller ethnicity, for the provision of standard housing including in relation to supporting and sustaining integrated communities;
- identifying and developing culturally specific responses to the needs of Travellers experiencing homelessness;
- tracking the experiences of the Traveller community in seeking to secure accommodation in the private rented sector and addressing the issues identified;
- establishing and developing a response to the needs of Traveller who are nomadic within and through the county through the provision of transient halting site bays;
- identifying and responding to the imperative of an informed and empowered participation by Travellers on the LTACC through capacity-building or support for local Traveller organisations to play a role;

- reviewing the provisions in relation to the local connection requirements for Travellers to access housing supports, to ensure that there is no discrimination when compared to the requirements on the wider community;
 - identifying and responding to specific needs of Travellers that flow from their distinct culture and identity, particularly in relation to social and economic activities; and
 - implementing the Public Sector Equality and Human Rights Duty in the next review of the TAP.
2. Establish and implement an ethnicity identifier in data gathering and analysis in relation to the provision of social housing and homelessness services and include all Traveller-specific accommodation options in housing applications (i.e. allow applicants identify themselves as a member of the Traveller community if they wish and for the sole purpose of identifying accommodation needs and include a list of needs/preferences any or all of which may be ticked, including, but not limited to permanent/transient halting site, group housing, outdoor space for dogs/horses and preference to be accommodated close to family members).
 3. Develop a more transparent recording of the methodology of collection and data obtained in the annual count of members of the Traveller community (for example by survey, setting out the steps taken to ensure all members of the Traveller community were reached and including such questions as multiple accommodation preferences and difficulties in accessing such preferences or other accommodation in the past).
 4. Consider the possibility of employing a Traveller Liaison Officer, in addition to a Tenant Liaison Officer, who should have a drop-in or phone clinic by which members of the Traveller community can voice any concerns they may have in respect of their accommodation directly. They could also assist with online applications where members of the Traveller community have no access to the internet. They should have regular meetings with members of the Council

mandated with housing issues to ensure regular feedback on accommodation issues raised by members of the Traveller community.

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

Appendix 1

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

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

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



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