

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



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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 Dún Laoghaire-Rathdown 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 Equality Review response to the Commission on 27 September 2019.

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

It comprises three sections, namely:

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

Section 1 Key areas of interest

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

The Council states that it operates a standard application system whereby any person within its functional area may apply for accommodation specific to their specific needs. The Council states that social housing assessment and prioritisation of all applicants are undertaken on the basis of fairness and equity and quotes from the Council's 2019 Allocations Policy in stating that the scheme:

"welcomes housing applications from people of all backgrounds irrespective of age, race, disability, religion, gender, sexual orientation, marital status, family status, or being a member of the travelling community".

According to the Council's review:

"social housing lists are prepared for households with a general 1, 2, 3, 4 bedroom need, older person accommodation, Traveller accommodation, homeless accommodation and enduring physical, sensory, mental health or intellectual impairment accommodation".

In this context, the Council provides that members of the Traveller community can apply for any form of accommodation provided by the local authority, including standard local authority housing, private rented accommodation or private housing assisted by local authorities or voluntary organisations.

In respect of Traveller-specific accommodation, the Council reports that it includes:

"group housing schemes, transient and permanent halting sites, whether authorised or unauthorised, that provide for culturally specific needs, including nomadism, proximity to family and access to horses".

The Council's review states that no data are collected on ethnicity in the social housing need assessment form used by the Council. The review reports that:

"there are no figures on the numbers of people from the Traveller community who have or are applying for or accessing general or standard local authority housing,

private rented accommodation or private housing assisted by local authorities or voluntary organisations”.

The review states that:

“therefore no inference can be drawn in relation to the impact of the above mentioned practices, procedures and other relevant factors on the promotion of equality of opportunity or discrimination in the provision of accommodation services by the Council to members of the Traveller community, as compared to settled persons / not members of the Traveller community”.

The Council’s review states that, as of September 2019, consideration was being given to including an ethnicity question in Council social housing need assessment forms. It states that this is one of a number of issues being addressed by the National Housing Practitioners Forum, chaired by the Housing Agency and made up of the DHPLG and representatives from across the local authority sector, including the Council.

In respect of addressing future Traveller accommodation need, the Council stresses the importance of consultation with the LTACC in preparing its TAP. The Council states that its staff conducted an assessment of need, issuing public notices and consulting with key stakeholders including the LTACC to prepare the current TAP, which addresses new accommodation targets as well as a programme of refurbishment works. The review states that staff report excellent working relations with the LTACC as a key factor in the successful drawdown of capital funding and delivery of the Council’s TAP 2014-2018. The Council states that the LTACC meets every six weeks and works with Travellers in an advocacy and support role to partner with the Council in progressing the delivery of the TAP and in helping address day-to-day housing standards and maintenance issues.

The Council’s review notes that:

“while the consultative nature of the process for assessing Traveller accommodation need is a welcome one, particularly as it supports the participation of local Traveller organisations, it is noted that there has not been any detailed census of Traveller accommodation needs for the area for some time”.

The Council's review recommends in this respect that in order to improve the delivery of Traveller accommodation services to members of the Traveller community, the Council should be supported to conduct a more comprehensive and detailed census of Traveller accommodation needs for their functional area. The review states that this may include the need for support to avail of outside resources to conduct a census over a prolonged period of a couple of months, consisting of more than one visit per site, in order to attain an accurate picture for an accommodation needs assessment. The review states that this will ensure that the Council has an independent and reliable source of data on which to develop an accurate accommodation programme to reflect required need.

B. Comparison of funding to comparator group

In Table 1A of the Equality Review, it is recorded that for annual capital expenditure for Traveller accommodation for 2015-2018, the total allocation from the DHPLG was €2,593,081 and the total drawn down was €4,744,310. The figures given for 2019, up to September of that year, were €103,999.60 for the total sum allocated and €85,232.81 as the total sum drawn down.

In respect of the annual current expenditure over the period of 2015 to 2018 for Traveller-specific accommodation (overall spend on maintenance, waste disposal and general upkeep), it is reported in Table 2 of the Equality Review that the total budgeted cost came to €3,807,456.

The Council reports in Table 4 of the Equality Review that the total allocation from the DHPLG for 'annual capital expenditure for upkeep and maintenance of general housing' for the same period was €111,021,118 and the total drawn down was €109,944,486.¹ It is reported that the total budget for long-term leasing was €15,722,214 and the total drawn down came to the same figure (adding the figures for drawdown in respect of long-term leasing units and voluntary units). Then, according to the Council's figures, the total

¹ Table 4 is broken down into the following sub-categories: Private Grants; Construction; Disabled Persons Alterations to Council Dwelling; Energy Upgrade Works; Acquisitions; Bad Relets; Capital Assistance Scheme; and Buy & Renew. In June 2021, the Council has advised that the expenditure in this table labelled 'Construction' refers to expenditure on building new standard social housing units.

budget for RAS accommodation was €24,966,560 and the total drawn down was the same figure.

Table 3 of the Equality Review sets out the Council's annual current expenditure for general housing (beyond long-term leasing and RAS expenditure and comprising 'overall spend on maintenance and upkeep') over the same period. This is reported to have amounted to a total budgeted cost of €24,202,095.

C. Adequacy of funding

The Council's review states that the staff team with responsibility for implementation of the TAP in the Council reports to the Senior Management Team quarterly, highlighting all implementation issues. The Council report that this has proven successful for the delivery of the previous TAP. The Council also report that all Traveller-specific accommodation projects for that period were completed.

D. Whether all funding allocated drawn down

Table 1A of the Equality Review sets out annual capital expenditure for 'Traveller accommodation' from 2015 to 2018. Over the four years, the Council reports that it drew down 83% more than its allocation (allocation €2,593,081; drawdown €4,744,310).

The Council reports that a number of factors impacted on its ability to drawdown funds, such as: the consultation process with families; technical issues between the Council and the DHPLG to agree plan changes to reduce costs; tendering and procurement processes; Part 8 process and the fact that large construction projects are not aligned with the financial year drawdown procedure.

The Council highlights the difference in application for funds process as between a single stage application and a four-stage application. The Council provides that while annual data in respect of the drawdown of funds for Traveller-specific accommodation are appropriate for the former, it is ill-suited to the latter as this involves more complex construction projects. Regarding the latter, the Council states that delays can occur on the initial design, on technical issues between the local authority and the Department to agree plan changes to reduce costs, on the procurement and tender process and on the Part 8 planning process. A project can be approved for funding but not scheduled to

commence until the following year. The Council gives the example of the Glenamuck project referred to in Table 1A of the review, which it states was approved in 2016 and construction was commenced and completed in 2017 and the drawdown took place in both 2017 and 2018. The Council states that this explained why, for 2016, funds drawn down were considerably less than funds allocated.

The Council further states that another reason why a comparison between funds allocated and funds drawn down might be skewed is when funds are drawn down for emergency development in respect of which no initial application for allocation was made, as it is reported was the case for the figures in 2015 of Table 1A of the review.

The Council's review recommends as follows on this issue:

"Staff report that the allocation and drawdown process is not suited to stage 4 construction projects or construction projects over €2 million. These projects can span many years and it is therefore not possible to drawdown all of the funding the same year in which it is to be allocated. The DHPLG could consider moving to a multi-annual budgeting process to allow for capital projects as many of these take longer than the financial year to deliver ... Moving to multi-annual application, allocation and budgeting process for capital projects for Traveller accommodation, including Traveller-specific accommodation, may provide a more effective means of securing a draw-down of capital funding for the Council from the DHPLG. This would support an alignment with the multi-annual Local Authority 5 year Development Plan and Traveller Accommodation Programme cycles. This would provide for a more cohesive reporting of the Local Authority's planning, application, drawdown and implementation activities to deliver Traveller accommodation services. It would also be beneficial for Local Authorities if the DHPLG made provision of emergency funding available for Traveller Specific Accommodation and ring-fenced for this purpose only".

E. Any further issues of equality of opportunity

The Council includes a section in the review concerning the Public Sector Duty generally. The review states that the Council is already training senior staff in:

“Public Sector Equality awareness and Human Rights Duty and intends to extend Equality Training to all staff as part of the next Corporate Plan”.

It reports that the Council was preparing a new Corporate Plan in Autumn 2019 and was to include equality and human rights objectives and actions, addressing its Public Sector Equality and Human Rights Duty. The review states that this:

“would provide an opportunity for the Council to consider the establishment of an Equality Committee, develop an Equality Plan, and follow best practice guidelines regarding consultation with stakeholders and service users and to communicate the provisions of this 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 process of completing the Equality Review

The Council commissioned an independent contractor to prepare the Equality Review. The process pursued by the Council in preparing the Equality Review is identified as involving a review of relevant documentation and meetings with staff to establish the data required. However, 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.

Traveller-specific accommodation and Traveller culture

The Council interprets 'Traveller-specific accommodation' broadly as comprising 'group housing schemes, transient and permanent halting sites, whether authorised or unauthorised, that provides for culturally specific needs, including nomadism, proximity to family and access to horses.'

The approach outlined by the Council, in its current TAP, in relation to the provision of transient sites, that these should only be provided following full provision of the Traveller-specific accommodation requirements identified by Travellers deemed 'indigenous' to the area, is a concern. This fails to address the imperatives of cultural difference, given the centrality of movement to the Traveller tradition. No steps are reported to establish the level of need for and urgency of such provision. A regional approach is suggested as being required, but no steps are identified as having been taken to develop this.

The Council further does not appear to give consideration to the need to proactively respond to the practical implications of cultural diversity in its general provision of social housing, which is limiting given the significant numbers of Travellers opting for such provision. As such, there is no reference to initiatives to support and sustain the development of integrated diverse communities on social housing estates.

Recognition of Traveller ethnicity

More generally, there is an absence of any formal recognition on the part of the Council of Traveller ethnicity. Further, no initiatives are identified to deepen an understanding of the practical implications of cultural difference based on such recognition, and to apply these in responding to Traveller needs.

In the TAP, the Council notes that they provide Traveller-specific accommodation for the County's 'indigenous Traveller community'. Indigenous is defined as having been permanently resident in the County for at least three years immediately prior to the adoption of the TAP. The inclusion of this conditionality is a concern, having regard to the provisions in relation to local connection requirements for the general population under the 2011 Assessment Regulations.

Moreover, a requirement of being 'indigenous' to the County should be applied in light of the findings of the High Court in *McDonagh v. Clare County Council* [2002] 2 I.R. 634 in which it was held that:

"a residence or indigenous policy ... must not be applied so rigidly that it becomes an effective bar to any consideration by the housing authority of an application for housing by a member of the Traveller community".²

Accommodation needs and true preferences

The Equality Review identifies the lack of any up-to-date detailed census of Traveller accommodation needs. This gap raises significant concerns as to the quality of assessing, tracking, and independently verifying Traveller preferences in relation to accommodation type. This concern is exacerbated in a context of under-performance in meeting targets for Traveller-specific provision which could in turn skew stated preferences. There is limited clarity to the assessment process implemented prior to the

² In June 2021 the Council advised the Commission of the following in relation to its policy to provide Traveller-specific accommodation for the county's 'indigenous Traveller Community': The Council states that it 'can demonstrate its flexibility' in relation to the application of the 'indigenous' requirement and that every application is reviewed and given consideration, on a case by case basis, and 'all relevant factors are taken into account including a local link'. 'Indigenous' is defined in the Council's TAP 2019-2024 as having:

"been permanently resident in the county for at least three years immediately prior to the adoption of [the TAP] 2019-2024".

current TAP, and there is no independent verification process identified in relation to the preferences reported in the TAP.³

The Council's review states that no data is collected on ethnicity in the social housing need assessment form used by the Council and that members of the Traveller community can apply for any form of accommodation provided by the local authority. This system does not permit of a comparison between the assessment of the accommodation needs of the Traveller community and that of the needs of members of the settled community.

Accommodation need, drawdown and expenditure

Over the period 2015-2018, there was over €109 million capital expenditure reported for 'the upkeep and maintenance of general housing'.⁴ There was also considerable current expenditure on social housing sourced from varying funding schemes. As there was no ethnicity identifier in the social housing application form, the Council could not determine the extent to which this addressed the accommodation needs of members of the Traveller community. The total capital expenditure for Traveller-specific accommodation over the period 2015-2018 was €4,744,310.

On the available figures, the ratio of capital spending drawn down for Traveller-specific accommodation to that drawn down for standard housing over this period was 4,744,310 : 109,944,486, or 1 : 23. No figures were provided in respect of the population of members of the settled community in the Council's functional area and so no meaningful comparison can be drawn from these figures. It is recognised, however, that the accommodation needs of Travellers may be met through general housing funds, if this form of accommodation is their true preference.

³ In June 2021 the Council advised the Commission that its:

"Traveller Accommodation Unit proactively engages with local Traveller advocacy groups during the annual Social Housing Assessment process to ensure any member of the Traveller community is aware of the process and is supported to complete and return the required form".

⁴ As *per* fn 1 above, this figure for capital expenditure for general housing is broken down into the following sub-categories in the table provided by the Council in its Equality Review: Private Grants; Construction; Disabled Persons Alterations to Council Dwelling; Energy Upgrade Works; Acquisitions; Bad Relets; Capital Assistance Scheme; and Buy & Renew. In June 2021, the Council has advised that the expenditure in this table labelled 'Construction' refers to expenditure on building new standard social housing units.

For the reasons set out, the Council's standard application system based on individual choice and current need, and absent an express question in respect of ethnicity in the application form, does not permit of disaggregated data to demonstrate the respective accommodation needs of members of the Traveller community as against members of the settled community in its functional area. It is therefore not possible to determine the levels of spending for the former relative to the funding for the latter.

The Council, in its Equality Review, identifies that, over the four years from 2015 to 2018, the Council drew down 83% more than its allocation from the DHPLG. However, the TAP 2019-2024 identifies that over the period of 2015-2018, the Council only met 81% of the housing needs assessed at 53 housing units. The overspend is accounted for by a significant emergency development that was not subject of an initial application for allocation of funding and by a significant increase in the expenditure required in another development. Further, while the Council met the target of 15 housing units for standard housing, it under-performed in relation to the target set for Traveller-specific accommodation, meeting 74% of the needs assessed.

The emphasis on standard housing in this situation raises concerns as to the response to cultural difference and the importance of Traveller-specific accommodation within this. This concern is further exacerbated where the TAP 2014-2018 refers to initiatives to 'systematically' convert halting site provision to group housing provision, 'as they become vacant'.⁵

A significant level of expense in respect of maintenance, waste disposal and general upkeep of Traveller-specific accommodation is reported in the Equality Review. The causes of this are not detailed or analysed beyond reference to:

⁵ In June 2021, after receiving a draft copy of this account, the Council advised that it:

"does not place an emphasis on standard social housing or grouped housing being provided ahead of other forms of Traveller specific accommodation. The allocation of 15 standard social housing tenancies to members of the Traveller community was a response to the needs and preferences of the households involved. All the households had applied for standard social housing and were made suitable offers of accommodation in accordance with our Allocations Scheme. In relation to grouped housing, the assessment of needs carried out with Traveller families in this County, highlighted that these families' preference was to have their bays converted to Group Housing Schemes. This was taken into consideration when drawing up the TAP and responding to these needs".

“the high percentage of breakages, damage, rubbish clearances, etc”.

The planning and budgeting processes

The Council identifies that the four-stage application process required for developments costing over €2 million is not appropriately tracked by annual data on the drawdown of funds given the greater complexity with potential delays in initial design; technical issues between the local authority and the Department on plan changes to reduce costs; procurement and tendering process, and the planning process. Such projects can be approved for funding in a particular year but not be scheduled to commence until the following year, and can span a number of years such that it is not possible to drawdown all of the funding in a given year. In the latter respect, the Council recommended that the DHPLG consider moving to a multi-annual budgeting process to allow for capital projects as many of these take longer than the financial year to deliver. This seems to have been addressed by the DHPLG through the modification of its allocation procedures set out in Housing Circular 03/2020.

Engagement and consultation with the Traveller community

The LTACC is deemed to have a role in advising on the management of Traveller-specific accommodation.⁶ However, no tenant participation in estate management initiatives are reported on these sites.⁷

The private rented sector

The Council's TAP identifies a number of Traveller households in private rented accommodation. While national research is quoted in relation to the high levels of

⁶ In June 2021, the Council has advised that:

“When progressing plans to redevelop sites as part of our TAP, there is extensive engagement with the residents on all aspects of the project”.

⁷ After receiving a draft copy of this account, the Council has advised the Commission that, as of June 2021, it has ongoing estate management initiatives involving tenant participation on four of its sites. It states that two of these initiatives commenced in 2018, one in 2019 and another in 2021. It states that these initiatives:

“involved an approach to specific sites to engage with residents to try and resolve issues such as illegal dumping, anti-social behaviour, parking, improvements to the sites, extra supports, and design improvements. Some of these initiatives have proved successful and some have failed”.

discrimination experienced by Travellers in the private rented sector, no Council initiatives addressing this issue are apparent from the Equality Review.⁸

Data is not collected on ethnicity in the Council social housing needs assessment form. This limits capacity to track the situation and experience of Travellers in this type of accommodation and to address specific needs that might arise for these tenants.

Travellers' experience of homelessness

The Equality Review does not address Traveller homelessness, but a level of homelessness and overcrowding is identified in the TAP. There is no identification of the specific experience of homelessness and homeless services by Travellers or specific needs they might have on foot of cultural difference. This is of concern if an effective response is to be ensured. The TAP notes that decisions relating to access to homeless services in the Dublin region are determined by need and not the status of an individual. This appears limiting in failing to take account of any practical implications that might arise due to cultural difference, and thus possibly presenting barriers to uptake of services.

Equality of opportunity and discrimination

The Council provides a broad equality statement in relation to its social housing scheme, that it 'welcomes housing applications from people of all backgrounds irrespective of age, race, disability, religion, gender, sexual orientation, marital status, family status, or being a member of the travelling community.' However, in emphasising fairness, the Council does not appear to give consideration to the need to proactively target Travellers given their particular situation of disadvantage and experience of discrimination, though it notes in the Equality Review that such positive action is allowed under the Equal Status Acts.⁹

⁸ In June 2021, the Council has advised that its Housing Department was prevented in 2020, as a result of Covid-19, from providing the Residential Tenancy Board's 'Betterlet: Accredited Landlord Training Scheme' for private landlords but that it expects to do so before the end of 2021 as part of its 'Equality Plan'.

⁹ In June 2021, after receiving a copy of this draft account, the Council advised the Commission that:

"the awarding of overall priority status to members of the Traveller community is provided for and actioned through [its] Allocation Scheme".

The Public Sector Equality and Human Rights Duty

The Equality Review identifies the Council's commitment to meet its obligations under the Public Sector Equality and Human Rights Duty. There is reference to training senior staff in the Duty and its intention to extend equality training to all staff as part of its next Corporate Plan. However, there is no evidence that the TAP has had regard to the Duty and no evidence of assessment of equality and human rights issues relevant to this function by the Council.

The Council further advises that when members of the Traveller community are to be offered a property, the Tenancy Management section visit and:

"assess the suitability of the property and estate, speak to the neighbours and the Traveller household and make every effort to ensure the allocation is appropriate and the tenancy is sustainable".

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:

- recognising and establishing the practical implications of Traveller ethnicity and ensuring a respect for Traveller culture and identity in the provision of services to Travellers;
- assessing, tracking and independently verifying the preferences of the Traveller community in relation to type of accommodation;
- reviewing the provisions in relation to 'indigenous Travellers' and the local connection requirements to access housing supports, to ensure that there is no discrimination when compared to the requirements on the wider community;
- 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;
- developing culturally specific responses to the needs of Travellers experiencing homelessness;
- responding to the practical implications of Traveller ethnicity, in the provision of standard housing, in particular for supporting and sustaining integrated diverse communities;
- analysing and responding to root causes, including their impact on tenants, of the high levels of expenditure on maintenance of Traveller-specific accommodation;

- for maintaining Traveller tenant participation in estate management on Traveller-specific accommodation;
 - tracking the experiences of the Traveller community in seeking to secure accommodation in the private rented sector and addressing the issues identified; 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).

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 drawdown 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 drawdown 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 drawdown 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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