

Appendix 2 : Submissions received from

- A) Health Service Executive**
- B) Respond! Housing Association**
- C) Irish Traveller Movement**
- D) Tallaght Travellers Community
Development Group**
- E) Clondalkin Travellers
Development Group**



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



Traveller Health Unit in the Eastern Region
Local Health Office Dublin West
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**Submission to
Traveller Accommodation Plan 2014-2018**

Contact Person: Ms. Concepta de Brun
HSE Regional Social Inclusion Specialist DML & Chairperson THU Eastern Region

August 2013

Introduction:

The Traveller Health Unit in the Eastern Region welcomes the opportunity to make this submission to inform the drafting of by the local authorities of the Traveller Accommodation Plans 2014-2018 in this region. We acknowledge the progress that has been made in the provision of Traveller accommodation during the last TAP and the work of local authority staff that contributed to making that possible. We would also like to acknowledge the good relations between HSE staff and SDCC in working collaboratively in Traveller inter-agency work over many years.

Traveller Health Units (THU) were established in each Health Board area as recommended by the Task Force on Travelling People (1995). When the HSE was later established a review was undertaken of THUs and it was recommended that they continue to operate on their original geographical area base. The THU in the Eastern Region covers all of Dublin and parts of Wicklow and Kildare. We support the operation of ten Traveller Primary Health Care Projects in this region.

The aim of the Traveller Health Units is to prioritise Traveller health at the local and regional level by:

- Monitoring the delivery of health services to Travellers and setting regional targets against which performance can be measured;
- Ensuring that Traveller health is given prominence on the agenda of the HSE;
- Ensuring coordination and liaison within the HSE, and between the HSE and other statutory and voluntary bodies, in relation to the health situation of Travellers;
- Collection of data on Travellers' health and utilisation of health services;
- Ensuring appropriate training of health service providers in terms of their understanding of and relationship with Travellers;
- Supporting the development of Traveller specific services, either directly by the HSE or, indirectly through appropriate voluntary organisations.

In this submission we highlight four keys areas which affect Travellers' health and are existing THU or Government policy which we believe need to be taken account of in the development of the Traveller Accommodation Programme 2014-2018. Namely:

1. Impact of social determinants on health
2. Impact of dispersal policy and slow pace in development of Traveller specific accommodation
3. Environmental health concerns
4. Safety of Traveller Children

1. Social Determinants of Health:

Our submission, in keeping with government policy, reflects a social determinants approach to health which recognises that some of the key determinants of health exist outside of the health care sector. This approach recognises that issues such as living conditions, educational attainment, employment status, racism, discrimination and poverty all impact on health as reflected in the National Health Strategy and the more recently published **Healthy Ireland Strategy a Framework for Improved Health and Well Being 2013-2025**. The vision of this Healthy Ireland Strategy is that *'we will have an Ireland where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility.'*

The goals of this Healthy Ireland Strategy are to:

1. Increase the proportion of people who are healthy at all stages of life
2. Reduce health inequalities
3. Protect the public from threats to health and wellbeing
4. Create an environment where every individual and sector of society can play their part in achieving a healthy Ireland

Healthy Ireland promotes a whole government approach to health and recognizes that health is the responsibility of all sectors in society and that health outcomes are affected by much that is beyond the control of health services. The Strategy therefore promotes partnerships and cross-sectoral working including greater collaboration between health services and local authorities. It acknowledges health inequalities and the impact of broader social determinants on health status; these determinants include accommodation provision and the impact that poor facilities can have on both physical and mental health.

The **All Ireland Traveller Health Study (2010)** documented Travellers continue to have high mortality rates and low life expectancy. The study found that the life expectancies of the Traveller community today are comparable to life expectancies of the general population in the late 1940s for males and early 1960s for females. Some of the key findings in relation to mortality rates and life expectancy are as follows:

- Life Expectancy at birth for male Travellers has remained at the 1987 level which is 15.1 years less than men in the general population
- Life expectancy for females is 11.5 years less than women in the general population.
- Traveller men have 3.7 times the mortality of males in the general population and for Traveller females the mortality is 3.1 times higher.
- Traveller infant mortality is estimated at 3.6 times higher than in the general population.
- Traveller suicide rate is 6 times higher than in the general population.

The **All Ireland Traveller Health Study** also documented that the majority of Traveller families now live in houses (73%) with 18% living in trailers. However the study indicated

that access to a range of public service amenities was poor. Travellers are a very young population with 63% of Travellers under 25 years and a mere 3% over 65 years. The Traveller family is getting smaller with the average family size of 4 documented.

Recommendations:

- Traveller specific accommodation should be developed and the needs of nomadic Travellers catered for as recommended in the Housing (Traveller Accommodation) Act 1998.
- Traveller organisations should be directly involved in the accommodation needs assessments which could be informed by their experience in conducting the AITHS.
- Projected growth in the Traveller population needs to be planned for and the changing demographic profile of the Traveller community should be taken into account by local authorities. This exercise should be undertaken in partnership with Traveller organisations.
- Needs of older Travellers, Travellers with a disability and Traveller children need to be specifically taken into account in developing the TAP
- Local authority staff should be trained in Traveller cultural competence

2. Impact of dispersal & private rented accommodation policy:

The **All Ireland Traveller Health Study** documented that the concept of Travellers as a community is integral to an understanding of their health status. Travellers self-identify, share a culture and value systems, choose to socialise and congregate together and value immediate and extended family networks. Such 'social capital' is found to be good for your health.

Increasingly local authorities are accommodating Traveller families in the private rented sector-either in houses or apartments, with little Traveller specific accommodation provision being built. In rural areas Traveller families are frequently being allocated accommodation in different towns posing difficulties in access to extended family members. These practices can contribute to a growing isolation among Traveller families and difficulties in accessing support from wider family members in child-rearing, baby-sitting, homework support, helping sick relatives, protecting women experiencing violence etc. They can also isolate Traveller families leaving them vulnerable to attack at times of community conflict. It can also expose children to discrimination from 'settled' neighbours at an early age.

Lack of security of tenure is another emerging issue for Travellers with an ever increasing number of Traveller families being accommodated through the private rented sector and the use of the Rental Accommodation Scheme (RAS) scheme. Traveller families accommodated in this way are not counted on the Housing list. With the threat, and reality, of banks re-possessing houses which were bought to let by private landlords, many Traveller families are being placed in vulnerable situations, with the risk of homelessness. Traveller families, like all families, find this situation very stressful and it is having a negative impact on their health.

There is now a growing recognition in society that Mental Wellbeing also depends on physical and social wellbeing. Perceived discrimination was a major problem for all

Travellers documented in the AITHS. This, along with the evidence of a suicide rate six times the national average (and seven times for Traveller men), as well as the high numbers of Travellers who said their mental health was not good and that they experienced depression, indicates some of the accommodation policies contribute negatively on Traveller health.

Recommendations:

- Traveller specific accommodation should be reflected in the TAP
- Travellers should remain on the Housing List when in private rented or RAS accommodation and efforts made to provide security of tenure for Traveller tenants
- Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation

3. Environmental concerns:

The National Traveller Health Strategy (2002) recognised that *'the living conditions of Travellers are probably the single greatest influence on health status. Stress, infectious disease including respiratory disease and accidents are all closely related to the Traveller living environment. It is clear that an immediate improvement to the living environment of Travellers is a prerequisite to the general improvement in health status.'* (p.28)

Many Travellers continue to live in very poor accommodation conditions and an unsafe physical environment. There is often a high level of overcrowding; damp problems; pest infestation and lack of basic facilities such as sewerage, public transport, paved roads, pedestrian pavements and electric lighting. Illegal dumping and intermittent rubbish collection are problems highlighted by Travellers. Poor site design and drainage problems as well as environmental hazards from land adjoining Traveller accommodation are concerns for Traveller residents. The AITHS documented that few Travellers own their homes (less than 13% compared to 70% of other medical card holders). Some Travellers live under a constant threat of eviction. A quarter of families considered where they lived to be unhealthy or very unhealthy and 26.4% considered their place of residence unsafe.

Living on isolated sites, beyond walking distance from services, it may be impossible to travel to health appointments during the day. For those families without an authorised place to stay, finding a stopping place with sanitation and water may often prove more of a priority than dealing with preventative medical issues. Enforced mobility, through evictions or lack of available stopping places, greatly reduces opportunities to attend appointments, follow up previous care and access a range of preventative health care.

Recommendations:

- A Framework for improving environmental health in Traveller accommodation should be developed and incorporated into the TAP
- Health Impact Assessments should be a prerequisite in the design of Traveller accommodation. They should also be undertaken on existing accommodation and reviewed during the lifetime of the TAP

4. Traveller Children

Traveller families are larger than those in the general population yet Travellers have fewer rooms in their homes than their settled counterparts (AITHS) which results in Traveller children often living in overcrowded conditions. Despite having bigger families the AITHS documented that 77.5% of Traveller children had no safe play areas on their sites or group housing schemes. Absence of play facilities often posed a risk to Traveller children's safety. A risk of equal concern is the proximity of many Traveller sites to dual carriageways and the absence of pedestrian lighting; lack of public footpaths or lighting placing young Travellers in danger when walking to school, shops or recreation facilities.

Living in poor quality accommodation and overcrowding can result in health difficulties for children. Research has shown that overcrowding can lead to an increase in infectious disease among children particularly gastro-enteritis, skin disorders and chest infections. There are also concerns that children's development can be hindered by living in cramped conditions and poor accommodation. It can also result in poor physical health including an increase in the incidence of asthma among children. The AITHS documented a child asthma rate of 70% in children reporting a current health problem. It also reported a higher prevalence of hearing, eyesight and speech problems among Traveller children compared to the general population-this is in keeping with international evidence.

The UN Convention on the Rights of the Child protects the cultural rights of children belonging to indigenous and minority groups, including Traveller children. The lack of provision of Traveller specific accommodation and the implementation of the Miscellaneous Provisions Act undermines the rights of Traveller children in exercising their culture and having the opportunity to continue some of their traditions including the right to be nomadic. Dispersing Traveller families throughout local authority areas and isolating Traveller children in private rented houses and apartments is undermining of Traveller culture and having negative health impacts manifested in mental health problems, drug addiction and breakdown of families. Poor accommodation is also affecting Traveller children's participation in and outcomes from the education system.

Recommendations:

- Play facilities should be provided in Traveller specific accommodation
- The cultural rights of Traveller children should be taken into account in the planning and provision of Traveller accommodation
- Child well-being indicators need to be factored into the TAP
- Traveller specific accommodation should be assessed in terms of its impact on children's well-being and the findings addressed in accommodation up-grading; maintenance or development

Respond! Head Office

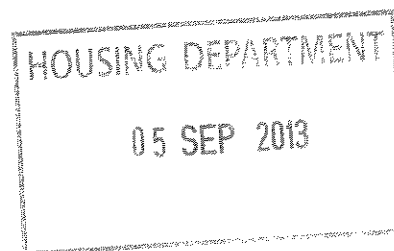
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The Senior Executive Officer
The Traveller Accommodation Unit
South Dublin County Council
County Hall
Tallaght
Dublin 24



23rd of August 2013

For the attention of The Senior Executive Officer,

The Respond Housing Association wishes to be considered for inclusion in the provision of Traveller housing and service's to South Dublin County Council in the new Traveller Accommodation Programme 2014 -2018

In early 2007, Respond! Housing Association launched its Traveller Accommodation and Support Policy. The aim of this policy is to provide a holistic approach to the provision of Traveller housing, encompassing all Traveller needs and issues. We have identified the following as the main areas of focus for the provision of housing to Travellers at this time:

- Integrated Traveller accommodation and support
- Management of current Traveller accommodation schemes
- Training and education
- Creation of integrated communities
- Care and support
- Formation of good relations
- Creation of employment opportunities

Respond! In 2011 won the Irish Councils For Social Housing Award for Traveller Accommodation in the area of design, management, community development and sustainability.

If you require any further information or wish to discuss this matter in greater detail, please contact myself at 0818 357901.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Philip Dillon".

Philip Dillon
Special Projects Manager

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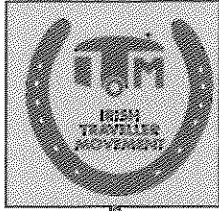
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George Sinclair,
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Traveller Accommodation Unit,
South Dublin County Council,
County Hall,
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Dublin 24

HOUSING DEPARTMENT

18 SEP 2013

9th September 2013

Dear Mr Sinclair ,

Re: Submission to Traveller Accommodation Programmes 2014 - 2018

Please find enclosed a submission from the Irish Traveller Movement in regard to the new round of Traveller Accommodation Programmes 2013 - 2018

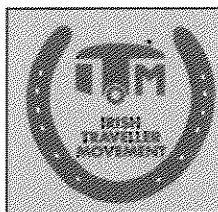
The Irish Traveller Movement hopes that you find this submission of use when drawing up your new draft programme.

Please do not hesitate in contacting us if you require further information or support in relation to any issue raised within the submission or otherwise.

Yours Sincerely


Colette Spears

National Accommodation Officer



Submission to Local Authorities in Preparation for the Fourth Traveller Accommodation Programme 2014 – 2018

Background

The Irish Traveller Movement (ITM) welcomes the opportunity to provide input to the review of the third round of the Traveller Accommodation Programmes (TAP). Based on the learning and experience gained from the implementation of previous programmes, the ITM have identified a number of key issues and recommendations, which we hope will assist you in the development, adoption and implementation of your Traveller Accommodation Programme as required by the Housing (Traveller Accommodation) Act 1998 and the Housing (Miscellaneous Provision) Act 2009.

At a national level, the National Accommodation Officer – employed by the ITM, with financial support from the Department of Environment, Community and Local Government (DECLG) provides a significant resource to the development of TAPs as referred to in the Traveller Accommodation Unit (TAU) Guidelines.

At a local level, Traveller organisations also make arrangements to support and resource Traveller participation in the drafting and implementation of the TAPs. Both the DECLG and the National Traveller Accommodation Consultative Committee (NTACC) recognise that local organisations are a crucial resource for the successful preparation and implementation of the TAP.

Consultation at a Local Level

The NTACC has produced guidelines on the appropriate consultation mechanisms at a local level.¹ The ITM strongly recommend that these guidelines are followed in regard when reviewing the functioning of the TAPs.

¹ National Traveller Accommodation Consultative Committee, Guidelines on consultation mechanisms concerning a Traveller-specific accommodation project, 2008.

Operation and Membership of Local Traveller Accommodation Consultative Committees (LTACCs)

The following recommendations are based on the NTACCs' Guidelines² developed and published in 2004, following an initial review of the operation of the LTACCs.

- Nomination procedures must be inclusive and transparent. It is important that the appointed Traveller representatives are in a position to represent the general Traveller population in each area. In areas where local Traveller accommodation organisations exist, these groups should nominate their own representatives, and in areas where local groups do not exist, the national Traveller organisations can be of assistance to Local Authorities.
- LTACCs advise the appointing authority in relation to:
 - a) The provision of accommodation for Travellers
 - b) The preparation and implementation of any accommodation programme for the functional area of the appointing local authority, and
 - c) The management of accommodation for Travellers
- LTACCs should not be used as a forum to discuss individual cases.
- LTACCs should meet a minimum of 4 times a year, as laid out in the Housing (Traveller Accommodation) Act 1998.
- As stated by the NTACC, the appropriate Director of Services should report in person to every meeting of the LTACC.
- The overall objective of the LTACCs is to assist in ensuring the full implementation of Traveller Accommodation Programmes by the Local Authorities. In order for this to happen, the LTACCs should measure and monitor progress on at least a quarterly basis, in accordance with the relevant TAP's annual targets and it's work plan.
- Process as well as delivery should be monitored by the LTACC.
- The LTACC should produce an Annual Report giving a summary of activities for the period in question. Copies of this Report should be given to the appointing authority as well as a copy sent to the National Traveller Accommodation Consultative Committee.
- The LTACC should formally report to the appointing authority's Manager & Director of Services twice a year. The Manager and

²Review of the Operation of the Housing (Traveller Accommodation) Act 1998, National Traveller Accommodation Consultative Committee, June 2004.

Director of Services should formally be asked to meet with the LTACC once a year, on completion of the LTACC's Annual Report.

- As was highlighted by all key stakeholders at the National Seminars organised by the NTACC, the proper functioning of the LTACCs is crucial to the success of TAPs. In cases where authorities are having difficulties in regard to the establishment or functioning of an LTACC, the national accommodation officers of the ITM are available to assist.
- The guidelines recommend that 25% of the members are elected representatives and at least 25% are Travellers. It is noted that "*Putting People First*" proposes the reduction of the overall numbers of elected representatives in local authority areas. This should not have any impact on their representation on the LTACC.
- The position of the Chairperson should be reviewed at the end of the second year of appointment; this position should be rotated among the various representatives.

Policy Statement

The ITM recommends that a TAP's statement of policy should be drafted by the relevant LTACC. The statement should make a clear commitment to the principle of equality with regard to Travellers and the provision of appropriate accommodation. This would ensure that the TAP is clearly based on respect for Traveller culture, and a commitment to provide accommodation to Travellers based on their specific needs. The statement could read as follows;

*'The Government Task Force on the Travelling community (1995) recognised that Travellers are a distinct group with their own customs, traditions and culture. **Insert your local authority name** also recognises Travellers' identity as a minority ethnic group, some of whom are nomadic. It is the policy of the council to have meaningful consultation based on DECLG guidelines with Travellers about their accommodation needs and to provide, where appropriate, Traveller specific accommodation.'*

Statement of Strategy

The Fourth TAP should be bound by **SMART** principles, **S**pecific, **M**easurable, **A**chievable, **R**elevant and **T**ime bound. These should be stated within the strategy statement and reflected throughout the detail of the TAP. This can be achieved through setting specific targets and timeframes for both the delivery of accommodation, and for the programme of improvements to pre-existing Traveller accommodation service. (See Appendix I)

ITM's experience over the previous three TAPs and the review processes indicates the persistence of a number of issues that can act as obstacles to the provision by Local Authorities of Traveller accommodation. The recurrent

issues relate to land stock, land acquisition, CPOs and transfers and maintenance of property and land between urban and rural functional areas.

Where land acquisition is a barrier to the provision of Traveller specific accommodation in your area, this should be explicitly stated in the Strategy Statement along with proposals to address land shortage issues. For example, proposals relating to CPOs and/or transfers between adjoining urban and rural authorities.

Where possible, specific locations should be named so that the implementation of TAP is capable of being monitored. Furthermore, Local Development Plans should include the objectives of TAPs as required by Section 26 & 27 of the Housing (Traveller Accommodation) Act 1998.

While acknowledging the economic environment that we live in and the effect of budget reductions in implementing the third TAP, it is submitted that any lack of access to funding can be overcome with careful and strategic planning and foresight, and the requisite political will. Local Authorities are obliged to demonstrate genuine and meaningful progress towards implementing their TAP.

For your TAP to be realistic and achievable, it is important to begin drafting the programme by addressing the specific accommodation needs of Travellers and any issues or obstacles that may be present. The Irish Traveller Movement contends that financial constraints should not limit the scope of the TAP. Its primary aim is to assess and meet the need of local Travellers.

Furthermore, the Joint Oireachtas Committee on Environment, Culture and Gaeltacht (May 14th 2013) was severely critical of the significant *under-spend* by certain Local Authorities of their allocated Traveller accommodation budget and made recommendations to the Minister on requiring the relevant Local Authorities to explain and account for any under-spend.³

Assessment of Needs

As set down in Section 6 of the Housing (Traveller Accommodation) Act 1998 the assessment of need is "*intended to ensure an integrated assessment of the accommodation needs of Travellers.*"⁴

In order to comply with consultative obligations, the ITM submit that local Traveller organisations must be involved in the assessment of need process.

³ [Local authorities must explain why they have not drawn down allocations for Traveller housing – Environment Committee](#)

⁴ Housing (Traveller Accommodation) Act, 1998 Memorandum on Implementation.

In the case where local Traveller organisations have developed their own assessments based on the attached Appendix II, the local authority must take this relevant, specific and specialist research into account when compiling figures.

An assessment of needs must include an assessment of the need for:

- Halting sites
- Accommodation for Nomadic families- the assessment of the need for transient halting sites must take account of the “annual patterns of movement of Travellers.”

The assessment must take account of present and future needs during the lifetime of the programme. The experience and involvement of the ITM in the review of the last three TAPs indicates that the assessment must also take account of any existing or potential increase in population relating to relevant economic and social factors, as well as natural family increases. The figures, analysis and conclusions of the ‘*Our Geels - All Ireland Traveller Health Study*’ is an invaluable resource when compiling the profile of the local Traveller population. This report is a useful resource to all relevant statutory bodies however the onus is on local authorities to assess current need and predict future need relating to the specific circumstances of their geographic area, and to prepare an appropriate accommodation programme. Families in halting site bays, group housing, standard housing, private-rented and new family formations should be included in this. Following the assessment and gathering of figures, this data should be incorporated into the TAP.

The planning and designing of Traveller-specific culturally appropriate accommodation must also take into account of any economic activity of Travellers eg horses/scrap.

The Use of Private Rented Accommodation for Social Housing or Traveller Specific Accommodation

The changing approach of the State from supplying social housing through Traveller-specific accommodation to almost exclusively providing only private rented accommodation has many negative consequences for Travellers. Section 19 of the Housing Act 2009 refers to the provision of social housing supports and includes both rental accommodation and provision of sites for caravans. Due to the lack of *provision of sites for caravans* or group housing, Travellers are finding it difficult to access social housing other than private rented housing. This can leave Traveller families isolated and vulnerable which can in turn lead to many other problems, including homelessness. This is compounded by the general distrust of the majority population with regard to Travellers which can cause difficulty in accessing rented accommodation, and in maintaining peaceable tenancies on a medium to long term basis. The

ITM has received reports that in order to access the private rented market in at least one Local Authority area, Traveller families have been compelled to resort to sub-letting private rented houses from other nationalities. The insecurity and irregularity of this situation cannot benefit either tenants or Local Authorities, and can lead to a constant circular movement of families being passed from one State service to another which may eventually lead to homelessness.

The Irish Traveller Movement reiterates its recommendation that each Local Authority must carry out a Traveller-specific assessment of needs in conjunction with the local Traveller groups in your area in order to assess and address the need for Travellers Specific accommodation in your TAP, rather than relying on provision through private rented which it appears is the current preferred policy and which represents a failure of Local Authorities to comply with their legislative obligations.

Allocation of Accommodation

A fair and transparent allocation of accommodation must be a key feature of the Traveller Accommodation Programmes. The ITM strongly recommends that all Local Authorities adopt and implement a scheme of letting priorities based on a points system when allocating accommodation to applicants on waiting lists. A points system brings fairness, openness and transparency to the allocation process. Housing authorities cannot operate separate waiting lists for Traveller applicants to standard housing. The use of dual lists gives rise to concerns that quota systems are in use, and ignores the very real and immediate housing need that exists for many Traveller families.

The ITM questions the legality of quota clauses in Traveller Accommodation Programmes and in this regard strongly recommends that such clauses are not included in TAPs or form any part of Traveller accommodation policy. The ITM is of the view that such clauses are discriminatory, as they impose an additional requirement on Travellers when seeking accommodation which would not apply to a member of the settled community when seeking accommodation. This is contrary to the Equal Status Act as amended.

Compatibility with existing tenants of such accommodation must be considered as one of the criteria of any proposed scheme of letting priorities relating to Traveller-specific accommodation including Groups Housing and Halting Sites.

Furthermore the ITM submits that estate management issues with existing Traveller specific accommodation should not be used as a reason to delay or postpone the development of new accommodation. ITM is of the view that any such decision would also be contrary to the requirements of the Equality legislation.

Provision of Accommodation for Nomadic Families

Transient halting sites, as defined in the Housing (Traveller Accommodation) Act 1998 refers to sites with limited facilities for use, other than a normal Traveller place of residence.

The 1998 Act places a specific obligation on Local Authorities to provide accommodation for the annual patterns of movement of families. This not only requires Local Authorities to refrain from taking any measures that would inhibit nomadism, but also places a positive obligation on the Local Authority to provide the necessary services to facilitate nomadism. Local Authorities are statutorily obliged to address and make proposals relating to the provision of transient sites within their TAPs.

The Irish Traveller Movement submits that transient site provision must be an integral part of any Local Authority's accommodation plan and that the appropriate location and required services be discussed and negotiated in advance with any potential users to include both local Travellers and local Traveller organisations. Transient provision must not be used as a 'temporary' accommodation option for families normally resident in the Local Authority area who are awaiting permanent accommodation.

It is recommended that the use of a transient site could incur a flat fee per caravan and the level of charge should reflect the quality of facilities present on that particular site. This occupancy should be governed by licence clearly setting out the rules of the site, the particular occupancy, and the agreed period of occupancy.

An 8-week maximum duration of stay is recommended but the agreed length of the occupancy in any particular case should always be adhered to by both the Travellers and Local Authority in order to provide certainty and security to both parties.

Research conducted by the ITM demonstrates a very clear preference for transient site provision to be kept to smaller sizes and the provision of basic services with basic facilities to include hard surface, water, toilets and electricity supply.

The United Nations report on Ireland's compliance with its obligations in accordance with the International Covenant on Civil and Political Rights recommends, at paragraph 23, that Ireland "amend its legislation to meet the specific accommodation requirements of Travellers." The ITM contends that this would include the provision and availability of transient sites in order to allow for the nomadic culture of Travellers.

Although the provision of accommodation for nomadic families is not straightforward, Local Authorities cannot ignore it. Nomadism has long been accepted as an historical tradition and vital element of Traveller culture. Research commissioned by the Irish Traveller Movement and Traveller

Movement Northern Ireland analyses and discusses the issues surrounding Irish Traveller nomadism and its relevance today.⁵ The findings and conclusions of this research dispels any notion that nomadism will 'die out'.

The ITM would be glad to be of assistance to any Local Authorities along with input from the **Traveller Accommodation Unit (TAU)** and NTACC in regard to proposals to develop local accommodations options for nomadic families.

Identification of spaces for emergency use

Issues arise for Travellers and local authorities across the country when Travellers are forced to leave permanent accommodation unexpectedly due to violence, or intimidation by others. This puts enormous strain on both the families and on the relevant service providers. Sometimes these families come from outside the local authority's jurisdiction and are in need of respite. These families require particular supports in the short term and may not require long term accommodation in that local authority's area. ITM recommends that the Local Authorities view their needs from a humanitarian perspective.

The ITM recommends that every TAP contain a policy statement setting out how the Local Authority intends on addressing these situations. The ITM submits that each Local Authority should clearly express a policy of tolerance towards encampments that result from these circumstances, relating to families normally resident in that local authority's functional area or normally resident in the functional area of another Local Authority.

The ITM strongly recommends that Local Authorities work closely with the relevant parties including the families and local Traveller support groups while a strategy is developed to cater for the longer term needs. Transient accommodation, if available, might be suitable but other spaces could be identified.

Provision for Homelessness

Traveller families can become homeless as a result of eviction or to lack of provision of appropriate accommodation and can consequently find themselves with no option but to reside on unauthorised sites. Other Travellers may have become homeless due to leaving substandard accommodation. Neither category can avail of the homeless service as a result of legislative change brought about by the Housing (Miscellaneous Provisions Act) 2009. The Irish Traveller Movement recommends the repeal of the relevant section to allow Travellers to be supported by the homeless

⁵ Misli, Crush, Misli (Mc Veigh et al)

services, particularly in light of the current over-reliance on private rented accommodation and the particular difficulties faced by Travellers in accessing this market.

ITM also notes also that there are very few available services to meet the need of the larger family size, which family is often split by the relevant care authorities female/male which is contrary to the cultural norms of Travellers.

“27% of Irish Traveller women had had 5 or more children compared with just 2.6 per cent of women overall. Just over an eighth (13%) of Irish Traveller women had had 7 or more children, compared with 0.4 per cent of women generally.

In 2011, 26.4 per cent of Irish Traveller households had 6 or more persons compared with only 4.4 per cent of all households in the State.

The family composition of Irish Traveller households was different to those of the general population. There were proportionally more lone parent households (20.5% compared with 11.9%), fewer cohabiting couples without children (2.1% compared with 5%) and more households with more than one family (2.5% compared with 1.1%).”⁶

Caravan Loans

The Housing Act 2009 Section 12 (1) (c) provides for caravans and loans in Section 10 (vi). We strongly recommend that you include proposals in your TAP to offer such loans.

Voluntary Housing

The ITM recommends the use of Approved Housing Bodies in the development of new halting sites or group housing. ITM also recommends partnership between Travellers, the approved Housing Body and the Local Authority in the design and management of the site.

Tenant Participation and Estate Management

The degree to which Travellers are involved in the development of accommodation options and consulted and supported to play a full and meaningful role in the management of such, is central to building and sustaining a successful Traveller Accommodation Strategy. Benefits of tenant participation include the generation of a feeling of greater ownership within communities, resulting in tenants becoming more involved in the sustainability of their overall living environment; encourages dialogue between the housing authority officials and residents; moves the operational context from

⁶ CSO Press Release Census 2011 Profile 7 Religion, Ethnicity and Irish Travellers

complaints to a plan of action based on need and develops an understanding of Traveller issues and builds new relationships between all involved.

Section 24 of the Housing (Miscellaneous Provisions) Act 2002

It is the view of the DECLG and NTACC⁷ that local authorities should not direct the Gardai to use this legislation as far as practicable. The ITM concur with this view as well as the view of the DECLG that on the rare occasion that requires the use of this legislation is employed, its use should not be a grounds for a family losing its position on a housing list or worse still, being removed from the list entirely.

Any such legislation to “move families on” was only ever intended by the Oireachtas to be used in very exceptional circumstances. There are many other powers available to a Local Authority under the Housing Acts which are more appropriate to the legally sensitive issue of a citizen’s home without the need to resorting to the more draconian and disproportionate powers under the Public Order legislation.

Absence from a functional area due to the use of such legislation should not effect that family’s position on the housing list, unless they are accommodated by another Local Authority. Local Authorities should ensure, as far as practicable, that they do not lose communication with a family on its list who have been compelled to move out of the functional area due to that Local Authority’s action under the legislation.

Recently enacted legislation such as this, particularly relating to trespass, sends a message to Travellers that nomadism is not supported by the state and in practice it has meant that Travellers are no longer able to pursue nomadism for fear of imprisonment, criminal sanction, and confiscation of their family home. This legislation has seriously undermined Travellers rights to be nomadic as it has become virtually impossible for Travellers to travel and move freely within the state due to the lack of availability of legal parking place.

Conclusion

The Irish Traveller Movement recommends that your local authority includes in your Traveller Accommodation Plan:

1. A Policy Statement
2. Statement of strategy on;
 - a. Allocation of Accommodation
 - b. Transient provision

⁷ Review of the Operation of the Housing (Traveller Accommodation) Act 1998, National Traveller Accommodation Consultative Committee, June 2004.

- c. Emergency Accommodation
 - d. Homeless Services for Travellers
 - e. Caravan loans
 - f. Tenant Participation and Estate Management
 - g. Working with Approved Housing Bodies
3. The proposed functioning and operation of the Local Traveller Accommodation Consultative Committee
 4. Evaluation of the previous TAP (2009 – 2013)
 5. The Assessment of Need
 - a. Findings of the Housing Assessment April 2013
 - b. How Traveller Needs Assessment was conducted
 - c. Findings of the Traveller Needs Assessment

The ITM also recommends the use of the Targets format (Appendix I).

Finally thorough preparation and extensive consultation is key to the development of a workable and informed strategic plan, which is acceptable to all relevant stakeholders. Therefore it is strongly recommended that each Local Authority carries out an assessment of need in conjunction with as many local Traveller organisations and Traveller individuals as possible.

APPENDIX I

Example: Objectives and Target Dates for Delivery of measures contained in this plan:-

	Objectives	Commencement	Completion	Progress as at the 11 th July 2014
1.	Complete consultation in relation to formal allocation of five Traveller specific houses.	Already commenced	May 2014	4 Allocations completed – Houses to be handed over the 15 th July 2014
2.	Allocate standard housing to Travellers on an ongoing basis <ul style="list-style-type: none"> • <i>Projected Allocation over five year period:</i> <ol style="list-style-type: none"> 1. 2014 – 10 2. 2015 – 15 3. 2016 – 20 4. 2017 - 15 5. 2018 - 15 	Ongoing	Ongoing	Standard House Allocations 2014 5 allocations 2 further offers refused 2 transfers.
3.	Commence design of 2 unit Traveller specific accommodation at ?	July 2015	December 2015	Appoint design team end October Submit planning April 2016
4.	Construction and allocation of 2 unit Traveller specific accommodation at ?	May 2016	December 2016	Construction to begin May 2016 Allocate 2 units January 2017
5.	Replace the existing transient halting site with a new site in alternative land in general area, subject to planning	September 2015	December 2016	Ongoing
7.	Identify a location for permanent halting site for families requesting same who are currently living at ??? halting site.	April 2015	September 2016	Ongoing
8.	Design and construct five group houses in ????	June 2016	December 2017	Site identified Appoint design team end October 2015 Submit planning April 2016
9.	Refurbishment of ??? halting site	September 2015	March 2016	Departmental approval to proceed tenders received. Onsite construction to begin October 2015
12	Commence rental accommodation scheme to facilitate the provision of private rented accommodation for housing applicants including the Traveller community.	July 2014	Ongoing	Landlord Seminar held on the
14	Formulate and deliver tenant training programme specific to the needs of Travellers	June 2015	Ongoing	Liaison between local authority and the local Traveller group in September 2015 to begin formulation
15	Promotion of the Caravan loan scheme	Ongoing	Ongoing	Ongoing

Appendix II

ACCOMMODATION ASSESSMENT OF NEED

Surveyor name: _____

Date: _____

Time _____

a. Name: _____

b. Address: _____

c. Contact phone number _____

1. Are you on the City/ County Council housing list?

Yes _____ No _____

How long are you on the list?

If you were refused to get on the housing list , what was the reasons for refusal?

2. How many people live in your home – adults and children?

Name	Age

3. What kind of accommodation have you applied for? Why?

Halting site _____

- Standard Council House -----
- Single rural dwelling -----
- Private Rented house on the RAS -----
- Group House -----
- Transient Site -----
- Emergency/Temporary -----
- Tenant Purchase -----
- Voluntary Housing -----

Is this your preferred accommodation option?

If yes, have you ticked other options in your housing application?

Are you aware that the new housing applications do not accept preferences of types of accommodation?

What type of accommodation including Traveller Specific accommodation would suit your needs?

4. What kind of accommodation do you live in at the moment?

- Halting site bay _____
- Halting site (not in official bay) _____
- Caravan at the side of the road _____
- Standard Council House _____
- Private Rented house _____
- Private Rented house on the RAS _____
- Group House _____
- Homeless _____
- RAS _____
- Own House _____
- Voluntary housing _____

Are you Sharing Accommodation?

- 1. Bay _____
- 2. Council House _____
- 3. Private rented _____
- 4. Emergency/Temporary _____

5. What are your current living conditions like? Do you have the following in your home?

- Hot water _____
- Cold Water _____
- Electricity _____
- Toilets _____
- dampness _____
- central heating _____
- overcrowding _____
- access to maintenance _____
- Bin Collection _____

6. Is your accommodation affordable, if not why not?

7. If you are living in Private rented accommodation, Do you access rent Supplement?

Yes _____ No _____

8. Is where you live at the moment suitable for your needs?

Yes _____ No _____

If no: What do you need in relation to accommodation? (E.g.: Group housing for you and other families (who are these families), e.g. halting site accommodation, e.g. bigger house) _____

9. Special needs:

Does anyone in your household have a disability or serious illness?

Does anyone in the household have health needs for special or adapted accommodation?

What exact changes need to be made or considered for your accommodation needs?-

10. Do you have children both under and over 18 who are living with you and who need separate accommodation or who will need separate accommodation in the next 5 years?

Yes _____ No _____

If yes please give their details –

Name	Age	Married/ Married	Not Married	On Housing List ?	Type of Accommodation they would like

11. Do you travel during the year? If yes,where? Please list places you go to and for how long?

Name of Place	Why you go there	How long you stay there	Accommodation/facilities available to you there

If you do not travel , Why Not? Would you like too?

If there was a network of transient sites or traditional camping areas to re-open would you use them?

Yes _____ No _____

If yes, where should they be?



**Report on the Operation and
Effectiveness of the Local Traveller
Accommodation Consultative
Committees**

**By the Irish Traveller Movement
June 2009 – December 2010**

1. Introduction

ITM was requested to examine the operation and effectiveness of the Local Traveller Accommodation Consultative Committees (LTACCs), from a Traveller organisations perspective without drawing national generalisations, but rather with specific reference to individual local authorities. As a result we must emphasise that this report is potentially sensitive, and therefore the utmost of confidentiality is essential.

The Irish Traveller Movement (ITM) has carried out this evaluation at the request of the chairperson of the National Traveller Accommodation Consultative Committee (NTACC). ITM is particularly well placed to carry out this research because of our relationship with our members who sit on the Local Traveller Accommodation Consultative Committees.

The National Traveller Accommodation Strategy was put in place in 1999 with the establishment of the NTACC. Both this and the Housing (Traveller Accommodation) Act 1998 were seen by Traveller organisations as a significant step towards delivering on Traveller accommodation because it was to carry out an assessment of needs of Travellers and publicly committed the Local Authorities to meeting those needs. As well as providing an opportunity for Traveller and Traveller organisations to become directly involved as positive steps towards improving the accommodation situation of Travellers nationally. The LTACCs were established in 1998, they were seen to have the potential to monitor the delivery on Traveller accommodation and also provided an opportunity for Travellers and Traveller organisations to become directly involved in discussions with Local Authorities and elected representatives on accommodation issues.

This report is out in four sections:

- 1** Sets out the methodology used, and the role of the LTACC
- 2** Details the findings of the questionnaire,
- 3** The analysis of those findings
- 4** Sets out the recommendations.

1. Methodology

The research presented in this report is based on the questionnaire attached in Appendix 1. It was carried out in the latter part of 2010 and in early 2011 with Traveller organisations based in each local authority area. The interviewees were selected primarily on the basis of their being Traveller representatives on an LTACC. In the majority of cases the questionnaire was filled in by phone interview with exceptions such as Dún Laoghaire Rathdown where the representatives filled it in as a collective. In County Limerick, the Traveller representatives were not available for interview and therefore a council official was interviewed. In one case (Cavan) there were no representatives available to complete the form. The questionnaire results were cross referenced with findings from the Traveller Accommodation Plans as adopted by April 2009. See Appendix 2

This report presents how LTACCs have operated from June 2009 to December 2010, during the third and current LTACC term. .

1.1 The Role of the LTACCs

Under the Housing (Traveller Accommodation) Act, 1998, each local authority is required to develop and implement a Traveller Accommodation Programme (here after referred to as TAP). The LTACC has a specific role in relation to TAPs which is to advise on:

- **the preparation of the TAP,**
- **monitor the implementation of the TAP,**
- **to advise on the management of Traveller accommodation,**
- **to provide a liaison between Travellers and the local authorities,**
- **to help with the annual count and assessment of needs.**

Guidelines were developed by the National Traveller Accommodation Consultative Committee on the operations of LTACCs were developed in ? and circulated to all Local Authorities. These guidelines set out the method of operation for LTACCs. While each committee should determine its own methods of operation the committee should:

- agree a regular schedule of meetings, the frequency and regularity of which should be agreed at the start of each calendar year,
- consider different days, times and places for meetings to facilitate its members,
- decide on a quorum for its meetings having regard to the requirements in relation to membership of committees as set out in Section 22 of the Housing (Traveller Accommodation) Act, 1998;
- agree on basic matters such as a prohibition on the use of mobile phones at meetings;

2. Findings

This section sets out the findings regarding the operation and effectiveness of LTACCs using the framework laid out in the NTACC guidelines as set out in 1.1.

Every local authority had approved its TAPs by April 2009. The TAPs¹ indicate differing degrees of commitment to fulfilling their statutory requirement. Twenty Local Authorities mention aspects of the operation of their LTACC such as:

- how often they will meet,
- the need for gender balance on the committee,
- relationships with other committees
- how they will involve Travellers at the meetings.

Fourteen do not mention how their LTACCs will operate, these are: Carlow, Cork County, Dún Laoghaire Rathdown, Fingal, Mayo, Louth, Sligo, South Dublin, Waterford County, Wicklow, and Cork, Dublin and Galway Cities.

2.1 Frequency of meetings

"In the last term, meetings were frequent because the local authority officials understand the statutory obligation; but the elected representatives are not on the same page, taking calls in meetings, staying 15 minutes and then leaving, or not turning up at all. So, meetings could last 15 minutes, or not at all if there is no quorum."

A Traveller representative

More than half of the LTACCs met in compliance with their TAP:

- 55% of LTACCs met quarterly;
- 15% of LTACCs met three times a year;
- 18% met for the first time and only once in 2010
- 9% met irregularly.

12% of meetings scheduled could not carry out the business of the committee due to a lack of quorum. In all but one case this was due to the lack of elected representatives. In Wexford the meeting in June 2010 was cancelled because there were no Traveller representatives in attendance. They stated that they received notification of the meeting on that morning. (See figure 1 below).

¹ All Traveller Accommodation Programmes (2009 -2013) were examined by the Irish Traveller Movement for reference to the LTACCs. (see Appendix 2)

How frequently did your LTACC meet?

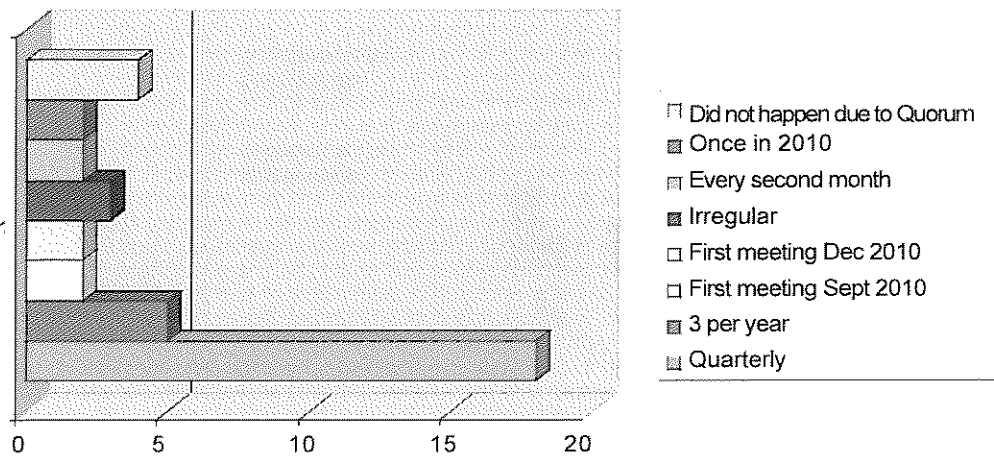


Figure 1: Frequency of Meetings

2.1.2 Attendance at LTACC meetings

The question addressed here was "What is the attendance like at the meetings for Traveller representatives and elected representatives?"

"They don't take into account Traveller representatives' availability in relation to childcare"

A Traveller Representative

Table 1 sets out the levels of attendance by both Travellers and Councillors. Traveller attendance at meetings is deemed to be good or at a high level in 60% of meetings compared to 24% of local authorities.

Table 1

	Travellers %	Councillors %
High Level of attendance	9%	6%
Good Attendance	51%	18%
50% attendance	9%	6%
40% attendance	3%	3%
Poor attendance	3%	6%
Inconsistent attendance	3%	15%
Available for meetings if held	9%	9%

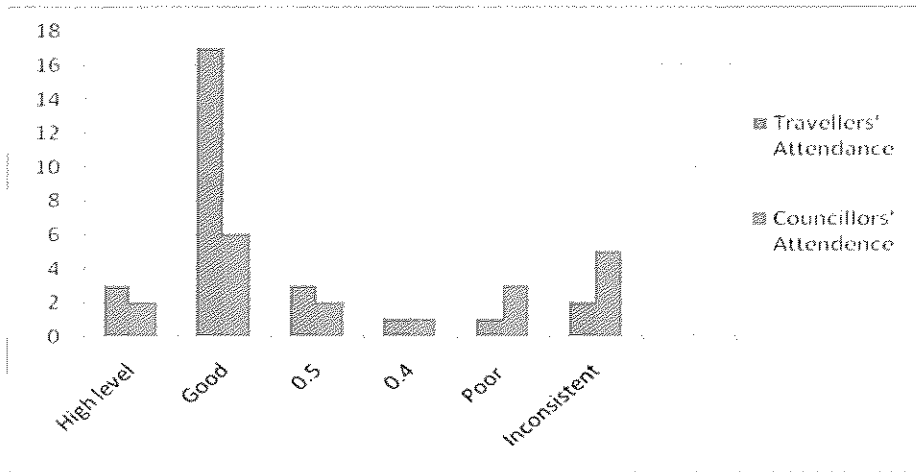


Figure 2: Attendance at the LTACC meetings

2.1.3 Location of Meetings

The question addressed here established where LTACC meetings took place.

The majority (82%) of meetings were held in council offices. Monaghan LTACC meets on Gortakeegan halting site. Clare, Galway county, Kerry, Limerick County, Longford have had one visit on a halting site and Cork City has recommended a site visit.

It is worth noting that all meetings were held during business hours.

2.1.4 Nomination Process

In response to the question "What is the nomination process to your LTACC?" the following answers were given:

- The nomination process for 73% of LTACCs was through the local Traveller group.
- Four LTACCs handpicked the Traveller representatives
- In other cases the Traveller representatives were:
 - Unchanged since 2000
 - Selected by the Traveller Health Unit or Primary health care project
 - Selected by the Interagency Group
 - There was no nomination process in Westmeath. A representative from the local partnership requested a seat.
- The Cavan representative did not know the nomination process

2.1.5 Training of Traveller Representatives and LTACCs

The Irish Traveller Movement provides training for Travellers and others who are potential LTACC representatives, which 80 people have attended to date. Of these, 45 have been nominated and actively attend the LTACC meetings. Their training consists of the history, structure and operation of the LTACC; roles and responsibilities of Traveller representatives; importance of preparation and debriefing as well as exploring challenging issues. Twenty-four local authorities were represented by Travellers: Carlow, Clare, Donegal, Cork, Dún Laoghaire / Rathdown, Fingal, Galway City and County, Kerry, Kildare, Kilkenny, Laois, Louth, Mayo, Monaghan, North Tipperary, Offaly, Roscommon, Sligo, South Dublin, Westmeath, Wexford, Dublin City and Waterford City. The following local authority areas were not represented at training: Cavan, Leitrim, Limerick, Longford, Meath, South Tipperary, Waterford County, and Limerick City. The reasons given for non attendance included change of staff in support groups, maternity leave, lack of funding for volunteers, no childcare, no support group in the area and therefore a lack of Traveller support to participate.

Three LTACCs have participated in different training: Sligo LTACC had intercultural training organised by Sligo Traveller Support Group. The two others were North Tipperary and Monaghan, who took part in training at their request from the Irish Traveller Movement on the following issues:

- LTACC history, structure and operation;
- Exploring challenging issues;
- Department Guidelines;
- Guidelines on Terms of Reference;
- Roles and Responsibilities.

2.1.6 Summation of the operation of the LTACC meetings

The frequency of the LTACCs does not tell us about the quality of the outcomes of the meetings. What is clear is that where training has been undertaken there has been an influence on the standing orders or the monitoring of the Traveller Accommodation Programme. Having meetings outside the local authority offices would be more conducive to Traveller participation, it would be beneficial for the LTACCs to consider meeting in the local Traveller groups offices as well as on sites.

2.2 Monitoring of the delivery of the TAP through the LTACC

One of the key areas examined in the survey was the effectiveness of the LTACCs in monitoring the delivery of the TAPs. This was measured through cross referencing the information gleaned from the survey data collection against the information set out in the TAPs.

Each TAP is required to have an assessment of needs and that defines the accommodation requirements of Travellers as defined by them and clear targets in units of accommodation that meets this need. The table below identifies which local authorities have complied with these elements from a Traveller perspective.

Table 2 below demonstrates:

- Assessment of Need the process and accuracy – measured by the respondents to the questionnaire. “Agreement” stated below refers to the agreement between all members of the LTACC at the meeting as understood by the Traveller representatives.
- Traveller Accommodation Plans and their adoption – checked from each TAP
- Targets in the TAP, stating the overall target if defined by the TAP
- Traveller Specific Outputs – measured by respondents feedback from their LTACC

All TAPs were adopted by the local authorities by April 2009, and all but one are working from their plan from 2009 to 2013. One local authority, Waterford City, is not working from their TAP because the County Manager has written an appendix to the TAP stating that he refuses to deliver on the TAP due to feuding during the previous TAP.

Table 2:

Local Authority	Assessment of Need: Process and accuracy	TAP adopted	Clear Targets ² in units of accommodation	Traveller Specific Outputs since June 2009
Carlow	No agreement	√	Overall target 60: not specific as to type	Idle refurbishments, changed transient to emergency accommodation
Cavan	None carried out	√	Overall target 30: not specific as to type	None
Clare	For discussion at the LTACC	√	Overall target 84: 45 group houses, 5 house purchase, 25 standard housing and 9 voluntary/RAS/affordable	18 new group housing scheme units 10 refurbishments
Co. Cork	1 st time it was carried out, differs from the AITHS ³	√	Overall target 122: not specific as to type	None
Donegal	Agreement except on the issues of transient need and population explosion ⁴	√	Overall target 84: 2 Group housing units, 3 Transient sites, otherwise mostly standard housing, private rented and voluntary housing	Group housing scheme refurbishment and change from transient site to emergency accommodation
Dún Laoghaire / Rathdown	No agreement	√	None	None
Fingal	No agreement	√	Overall target 103: not specific as to type	Group housing schemes x 2 and basic refurbishment
Co. Galway	No agreement	√	Overall target 105: 12 Group housing units, 11 halting site bays, 8 house purchase and 74 standard housing	None
Kerry	No agreement	√	None	7 refurbished and family transfer units

² The targets here refer to those specified in each local authority's TAP. The phrase "overall target" when used here means that the local authority has defined a total number of units of accommodation which it aims to deliver /make available to those of its tenants/customers who are Travellers. This varies between Traveller Specific Accommodation, local authority housing and private rented housing. Where the phrase "Overall target" is not used, this signifies that this local authority's TAP did not give an overall target. Numbers refer to the number of accommodation units aimed at. (Note: In some cases the numbers of targeted accommodation units laid out for the different types of housing in the TAPs did not add up to the total target.)

³ All Ireland Traveller Health Study

⁴ The population has grown by 35 families over a two year period to 2010 and the local project records visiting families to Donegal as they meet them. In 2010 there were 300 visiting families over the summer months.

Local Authority	Assessment of Need: Process and accuracy	TAP adopted	Clear Targets in units of accommodation	Traveller Specific Outputs since June 2009
Kildare	No agreement	√	22 halting site bays, 6 group housing units	6 group houses
Kilkenny	Hired researcher but plan does not include their findings	√	Overall target 57: 24 standard housing, 2 halting site bays, 16 group houses	Refurbishment to one house for disabled use
Laois	LA announced it through local media, but few responses. The local group offered to help families to fill in forms. Laois Traveller group submission partly considered	√	6 Group Housing scheme, 4 single purchase, 1 group housing scheme (5 houses) to be considered, No mention of transient accommodation	No Traveller specific, only standard housing delivered
Leitrim	No agreement	√	Overall Target 16: 6 standard housing, 10 group housing	6 group houses, 15 halting site bays, 2 refurbished with kitchens
Co. Limerick	Social worker used annual count and housing applications	√	Overall target 65 out of 96 identified by assessment of need: not specific as to type	None
Longford	General agreement	√	40 standard housing, 10 halting site bays and 30 RAS (Rental Accommodation Scheme)	None
Louth	Not clear	√	Overall target 66: 64 standard housing, 2 group houses	None
Mayo	No agreement, differ between Assessment of Need and AITHS	√	Overall target 34: 32 Standard housing/ RAS/Private Rented; 2 voluntary housing	None

Local Authority	Assessment of Need: Process and accuracy	TAP adopted	Clear Targets in units of accommodation	Traveller Specific Outputs since June 2009
Meath	Based on interviews by social worker and submission made by MTW ⁵	√	Overall target 61: 18 standard housing; 1 halting site (new); 26 refurbishment; 16 group houses	Refurbishment of St. Patrick's Park Navan and St. Martin's Park Trim
Monaghan	No agreement	√	Overall target 38: 26 standard housing; 6 single instance purchase; 6 group houses	None
North Tipp	General agreement	√	Overall target 55: 45 standard housing; 5 halting site bays; 5 group houses	None
Offaly	Joint assessment	√	None	4 group housing units and minor refurbishments
Roscommon	No agreement	√	10 standard housing; 4 single instance purchase; 27 RAS; 4 new halting site bays and 4 refurbished; 10 new group houses; 5 refurbished	None
Sligo	Agreement	√	Overall target 68: 27 standard housing; 11 single instance; 3 halting site bays; 18 group houses; 2 transient sites	None
South Dublin	No agreement but a review is planned for 2011	√	Overall target 96: 38 halting site bays; 28 group houses; 20 mixed	Halting site Tallaght, 8 new halting site bays in Clondalkin, 40 units refurbished
South Tipp	Combined results	√	20 standard housing; 7 single instance purchase; 10 halting site bays; 21 group houses	2 redevelopments, 1 house built
Waterford County	No agreement	√	6 standard housing; 1 single instance purchase; 4 group houses	None

⁵ Meath Traveller Workshop

Local Authority	Assessment of Need: Process and accuracy	TAP adopted	Clear Targets in units of accommodation	Traveller Specific Outputs since June 2009
Westmeath	No agreement	√	None	None
Wexford	No agreement	√	106 standard houses; 2 for special needs; 4 group houses	None
Wicklow	Joint process	√	Overall target 33: 25 standard houses; 3 single instance purchase; 5 halting site bays. Also 30 transient bays	None
Cork City	No agreement	√	Overall target 81: 61 standard houses; 12 halting site bays; 8 group houses	None except one by a private developer
Dublin City	No assessment of need was carried out	√	Overall target 131, not specific as to type	None
Galway City	No agreement	√	Overall target 133: 2 halting site bays; 2 group housing; 17 transient	Unofficial site was refurbished for use as emergency accommodation until 2012 for use then as transient
Limerick City	No agreement	√	Overall target 35, not specific as to type	None
Waterford City	Agreed but Co. Manager stated that the TAP will not be delivered ⁶	√	Overall target 31: 9 standard housing; 12 private rented/RAS; 4 halting sites; 6 group housing	Refurbishment of Kilbarry site but to low standard

2.2.1 Process and Accuracy of the Assessment of Need

The questions asked here were 'What was the process used to carry out the Assessment of Need' and 'Was there an agreement that this process was accurate?'

56% of Traveller representatives say they are not in agreement with the process or accuracy of the assessment of need carried out to inform the TAP, which in turn, informs the implementation of the accommodation plan.

⁶ The County Manager sent a letter as an appendix with the Waterford City Traveller Accommodation Plan April 2009

12% of local Traveller groups and local authorities used the best practice by carrying out a joint assessment or combined their information: Offaly, Sligo, South Tipperary and Wicklow.

9% agreed in general with the assessment of needs: Donegal, Longford and North Tipperary.

6% said it was not carried out

Each of the following refers to 3% of the respondents:

- process was unclear,
- the local authority hired a researcher but did not use the findings in the TAP
- It is for discussion.
- None carried out
- Social worker used annual count, housing applications
- Social worker used interviews and submission from local group

2.2.2 Delivery of the Traveller Accommodation plans monitored by LTACCs

Targets for delivery were taken from the Traveller Accommodation Plans for this report.

- 67% of TAPs had specific targets.
- 21% of the TAPs had non-specific targets, stating the number of units they would deliver but not the type of accommodation
- 12% of TAPs had no targets whatsoever.

There has been a lack of delivery/outputs of the programmes as monitored through the LTACCs from June 2009 to December 2010:

- 62% of the total LTACCs/Local Authorities had no outputs including those with specific targets.
- 65% of the twenty-three with specific targets delivered no Traveller Specific accommodation or no accommodation at all.
- Four local authorities (Carlow, Clare, Donegal and Galway City) altered their targets by changing transient sites to emergency sites.

One local authorities with non specific targets delivered group housing schemes, Fingal (10 halting site bays and 10 group housing scheme units). Two other local authorities without targets delivered refurbishment and group housing scheme units (Kerry (14 halting site bays refurbished in 2009) and Offaly (four group housing units and minor refurbishments)).

Table 3: Total delivery listed by respondents

	Group Housing units	Halting Site bays	Houses
New Builds	56	65	
Refurbishment	10	116	3

Change of Usage		<ul style="list-style-type: none"> • 6 transient sites changed to emergency • Developer bought site for own use and development and replaced site 	
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2.2.3 The issues raised at the LTACC meetings

The questionnaire asked “What issues were brought to the LTACC by the local group?”

The issues raised at the LTACC are listed in Figure 3 below. Here they are listed as priority issues:

1. The most prevalent issue with 33% of respondents identifying the need for halting sites
2. The next most prevalent issues, each by 24% of respondents were the need for group housing; facilities for keeping horses/impounding of horses; leaving accommodation and having no other options; overcrowding/population explosion and new couples needs;
3. Poor/appalling conditions is next at 21%;
4. Transient sites and maintenance issues are mentioned in 18% LTACCs.
5. Anti-social behaviour is mentioned by 15% as an issue.
6. The lack of policy on emergency accommodation and homelessness was identified by 12% of respondents.
7. At 6% of LTACCs the following issues were raised: Transfers, Housing assessments, tenancy agreements and estate management, recognition of Traveller culture and Traveller appropriate accommodation, court cases pending, lack of support for Traveller representatives and allocation/compatibility of families.

For 3% of LTACCs the issues identified were: the lack of caretakers, or the overstretched caretaker such as the situation in Donegal where one caretaker covers the area from Buncrana to Ballyshannon: the lack of a Traveller liaison officer. A number of other issues are mentioned at the 3% level including: Links with the interagency group; shared ownership, sheltered housing; housing single people; Habitual Residency Condition; Impact of budget cuts; Caravan loans; Lack of consultation; Only replacing halting sites rather than building new ones and resistance to the provision of Traveller appropriate accommodation by local authority and elected representatives.

2.2.4 Reasons for Non-delivery

When asked “What were the reasons for non-delivery?”the respondents to the questionnaire stated that:

- There were financial reasons; Money spent elsewhere; Do not have funding – waiting for 3 years from the Department; Recession;
- Traveller housing stock and general housing stock now linked so the pot is smaller for Travellers;
- Families blamed by Local authority
- Group housing scheme not progressed because the DOE requested the local authority to use own housing stock
- Not passed by the DOE yet
- Getting sites through planning, able to identify land but falls down at planning stage; Changes to planning;
- For the group housing scheme it is in relation to planning for road, waiting for the final plans for a new road; Lack of co-operation from neighbouring institutions;
- Local authority housing not reached due to lack of stock and new scheme. The councillors have a preference that it is filled through rental properties
- Lack of commitment by council officials; Resistance from councillors; Refocus by the council
- Fears of facing up to local opposition
- Slowness of delivery of Traveller specific accommodation
- Housing allocation of Travellers not prioritised because not considered an urgency even given the peoples' situations
- No demand for group housing (Local Traveller project can prove otherwise)
- Delays in the tendering process
- No plans for temporary halting sites
- No acknowledgment of size of Traveller families
- No specific annual targets
- Cannot source land; lack of access to land designated
- Change of preference by families
- No LTACC meeting as yet
- Objections from local community

Another reason for the lack of effectiveness in dealing with the issues raised at the LTACC was that Council official/social worker was on long-term sick leave allowing issues to become problems.

2.2.5 Summation of the Monitoring and the Delivery of the TAP by the LTACC

The majority of the respondents said they were not in agreement with the process used in the assessment of need. Therefore this indicates a lack of clear guidelines for local authorities, LTACCs and its representatives on how to carry out an appropriate assessment of need which includes Traveller families in private rented accommodation. Despite the fact that 67% of TAPs had specific targets 62% of local authorities had no delivery. This would imply that the Traveller representatives have little or no influence in the monitoring and implementation of the programme.

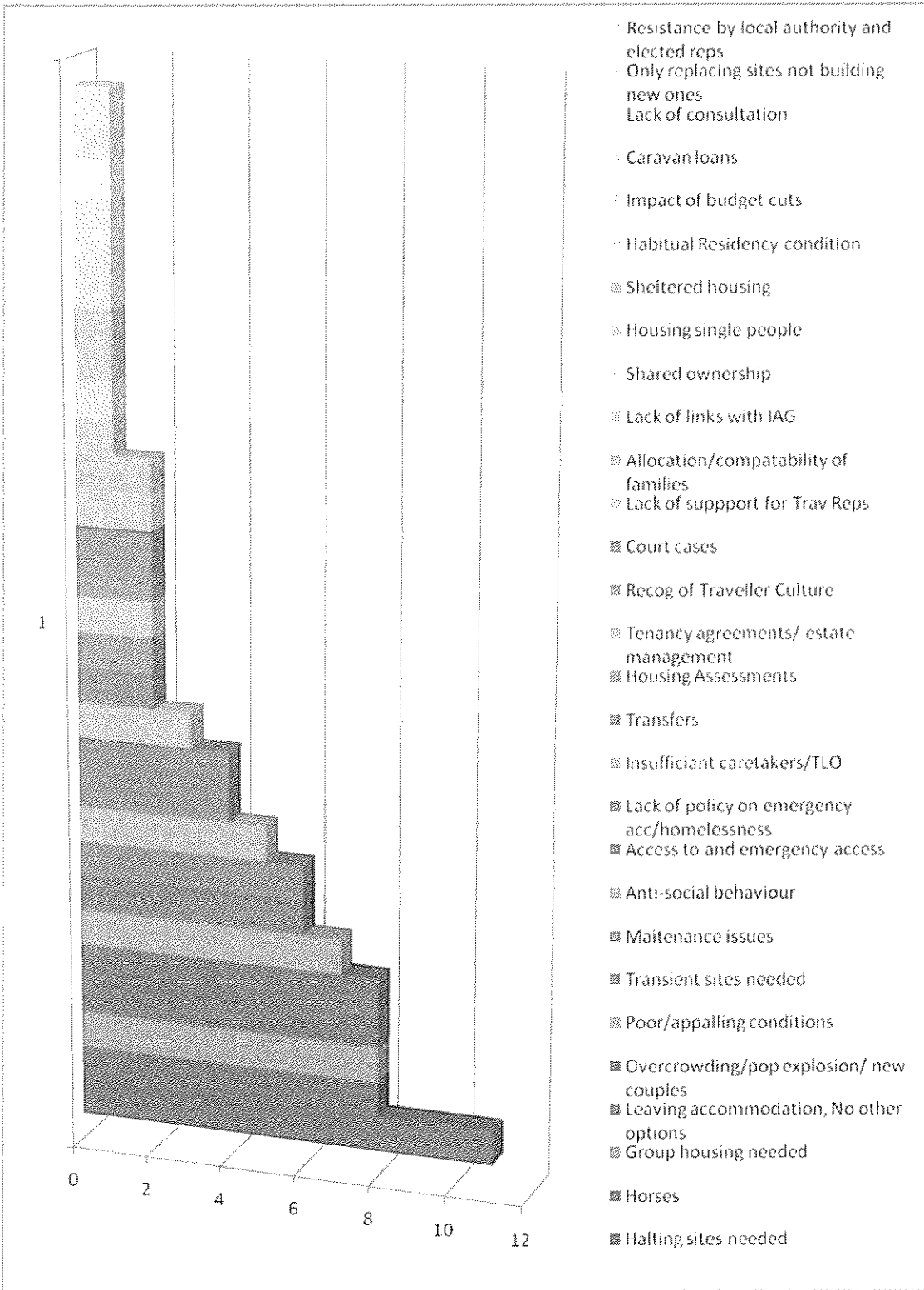


Figure 3: Issues Raised at the LTACC meetings

2.3 Reporting within the LTACC

2.3.1 Mechanisms of reporting to the City/County Managers

The question from the questionnaire: (The questionnaire is given in full in Appendix 1) Is there a process for reporting to the City/County Manager?

The responses received indicated that 56% of LTACCs have a clear mechanism of reporting to the City/County Managers. These are defined in figure 5 as:

- Through the internal structures director of housing, housing officer, social worker at 2%
- Through an annual report, 12%
- Minutes sent to the manager, 6%
- Through the social policy housing committee, Inter agency Committee and the Co. Community Forum, 6%
- In the terms of reference of one LTACC (3%), North Tipperary, the County Manager is to attend an LTACC meeting once a year.
- 12% of interviewees said there was no reporting mechanism
- 32% said the mechanism was unclear.

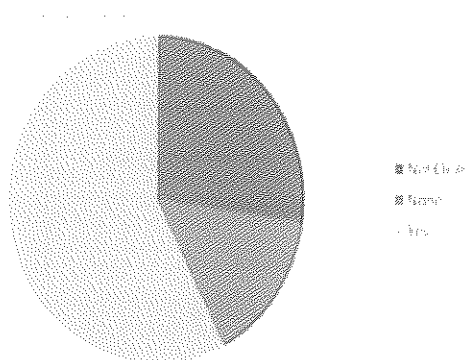


Figure 4: Reporting to City and County Managers

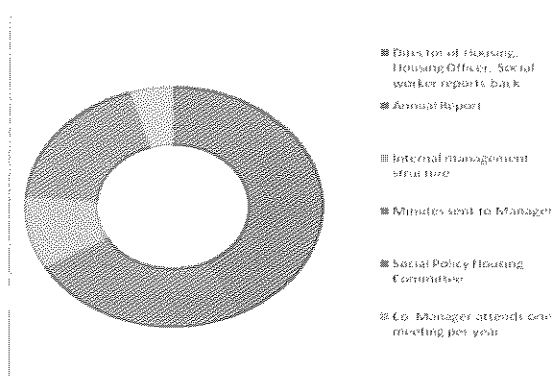


Figure 5: Mechanism of Reporting to the City/County Manager

2.3.2 Minutes and Agenda

The questionnaire asked "do you receive the minutes and agenda before the meeting, if yes, more than one week or less than one week? 58% said they receive it more than one week before, while 39% receive less than one week before. One group responded that they do not have their agenda before the meeting.

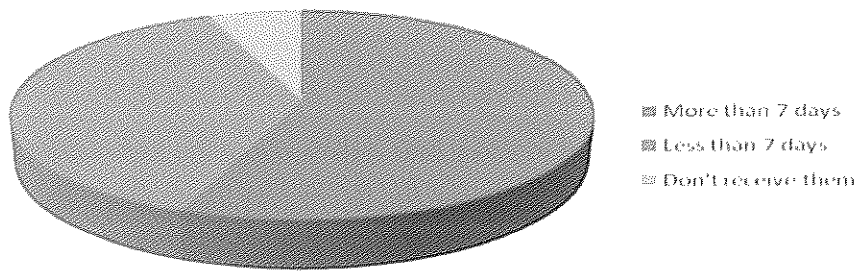


Figure 6: Minutes Received

2.3.3 Accuracy of the minutes

36% say the minutes are accurate. Most challenge any inaccuracies under matters arising. There are concerns that they do not reflect discussions in some cases and in others that “they are a narrative rather than an agreement of actions”. In one group, the Traveller representatives interviewed state that the minutes reflect the views expressed by the local authority officials and not the views given by Travellers.

2.3.4 How is the agenda influenced?

- 26% of Traveller representatives state that they add items for the agenda under Any Other Business.
- 32% contact the senior housing officer/social worker/ administrator/ council official
- 9% contact the chair (one of the chairs is a Traveller representative)
- 12% either feel overpowered by council officials or not feeling empowered enough to influence the agenda.
- 9% Set by the Traveller Accommodation Unit of the local authority
- 6 % Do not know how to influence the agenda
- 3 % of respondents **each** indicated the following:
 - Set from the previous meeting
 - Use the Inter-Agency Group and influence councillors to get items on the agenda.

2.3.5 Summation

The findings of the reporting mechanism suggest that the County Manager meets the LTACCs to look at blocks and barrier, allowing the local authority to be accountable. It is only planned to happen in North Tipperary so we have not got the evidence in this term as to how this works. Issues such as planning may be addressed and there is a greater chance of the LTACC being embedded within the culture of the local authority. Having a strong link with the Interagency

Group and the Strategic Housing Policy Committee helps influence the progression and delivery of the TAP as with South Tipperary and Donegal.

2.4 Behaviour at Meetings

The respondents to the questionnaire were asked to score their beliefs about the behaviour of all participants at the meeting using the table below. These are the results as an absolute number rather than percentages.

	Very Good	Good	Not good
Understanding of Traveller issues	2	11	20
Attitude to Traveller Reps by councillors and council officials	8	16	9
Attitudes to other Reps by Travellers	13	14	6
Working Relationships	5	17	11
Effectiveness of Chairperson	12	13	8

2.4.1 Effectiveness of the Chairperson

36% of respondents scored the effectiveness of the chairperson as “very good”, 39% as “good” and 24% as “not good”.

Some comments made in the responses stated that the effectiveness of the chairperson was good because of “an independent perspective” and “supportive to Travellers in the county”. On the other hand the chairperson was found to be ineffectual if they had not convened an LTACC meeting; if they “tow the party line”; or if they did not allow some flexibility in the formality of the meeting process, making it “not conducive to developing relationships” between the Traveller representatives and the other members of the LTACC.

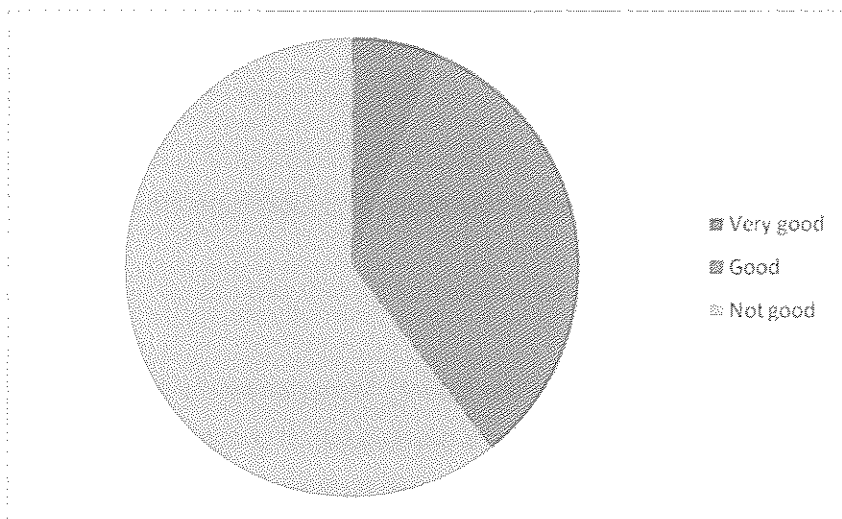


Figure 7: Understanding Traveller Issues

Some of the reasons for poor understanding of Traveller issues were added by a number of the interviewees. These included:

- No recognition of nomadic culture
- No interest, as demonstrated by answering phone-calls, painting nails during the meeting

Attitudes of the Representatives

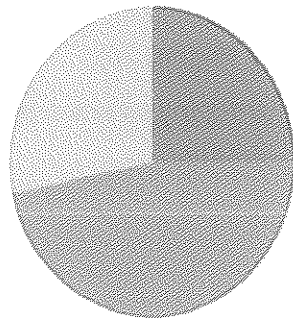


Figure 8
Attitude of Councillors and Council Officials to Traveller Representatives

Some respondents expressed in

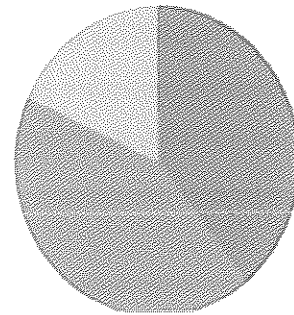


Figure 9: Attitude of Travellers to Councillors

their questionnaires the attitude of the councillors/elected representatives towards them (Figure 8) as:

- Very good to some but not to others;
- Tolerated;
- Disrespectful;
- Frustration;
- Tokenistic, not recognised as key stakeholders;
- Depends on confidence of the Traveller how they are treated;
- Sweet and false behaviour is undermining.

Some of the comments expressed regarding the Attitude of Traveller representatives towards the other representatives (Figure 9):

- Atmosphere positive Feel patronised by the other representatives so do not respond well to the elected representatives;
- All very politically correct;

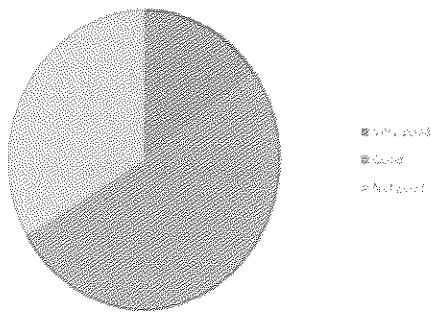


Figure 10: working relationship

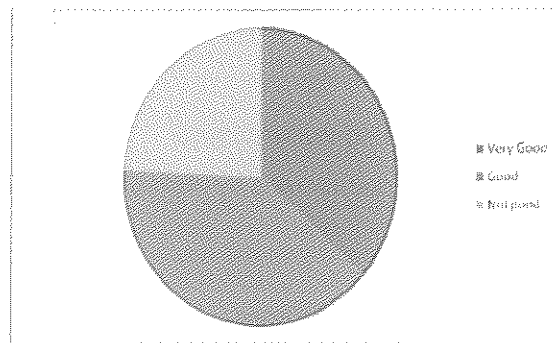


Figure 11: Effectiveness of the Chair

Comments made regarding the working relationship at the meeting (Figure 10):

- Improved since new chair and new director of housing and a streamlining exercise by the local authority to ensure that meetings do not clash for councillors
- Communication breakdown
- Variable
- Influenced by Inter-Agency Group processes
- Argue the points and sometimes there is huge conflict but being respectful at all times

2. 5 Business and Progress of the Meetings

	Very Good	OK	Not Good
Frequency of meetings	9	11	13
Attendance at meetings	6	19	8
Understanding of Traveller issues	2	12	19
Knowledge of Traveller Accommodation Programme (TAP) by members	5	15	13
Ability of members to progress the implementation of the local TAP	1 ⁷	8	24

⁷ The "very good" response to the "ability of members to progress the implementation of the local TAP" was given by the council official while in that particular local authority area there has been no provision for Traveller specific accommodation between June 2009 and December 2010.

The following charts from Figures 12 to 16 will be analysed below:

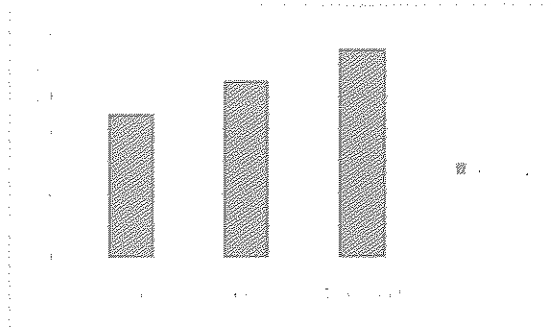


Figure 12: Frequency of meetings

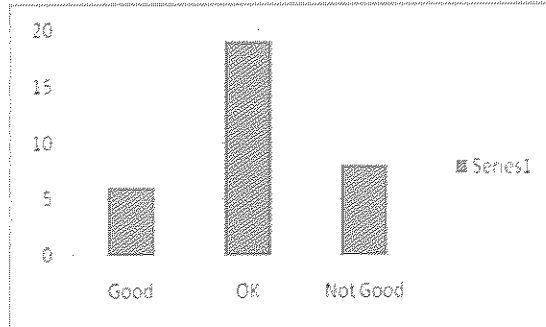


Figure 13: Attendance at meetings



Figure 14: Understanding of Traveller Issues

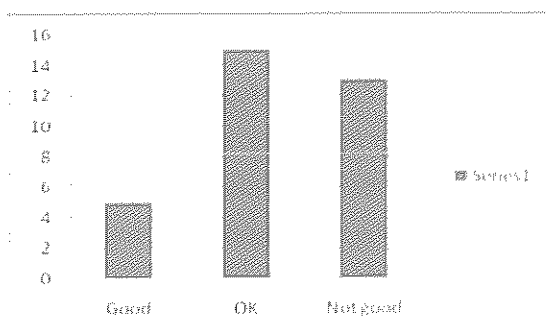


Figure 15: Knowledge of the TAP by members

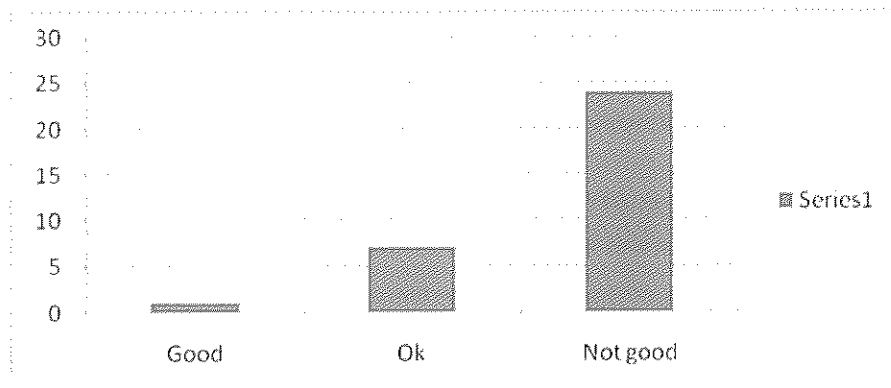


Figure 16: Ability of members to progress the implementation of the TAP

3. An Analysis

The following analysis draws together the findings under 4 key headings:

- Operation
- Monitoring
- Reporting
- Behaviour

3.1 The operation and effectiveness of the LTACC

The effective operation of the LTACCs is affected by a combination of the issues including the frequency and quality of the meetings as well as attendance, nomination process and location of the meetings:

3.1.1 Frequency of Meetings

Although 55% of LTACCs met four times per year only 27% of respondents were fully satisfied with frequency of the meetings. In one instance an LTACC met every second month for an hour. This was deemed inadequate as the frequency of meetings does not represent quality. An hour allocation for a meeting does not allow for exploration of and discussion on the issues hence there is little progression of the TAP.

Quality meetings that enable the business of the LTACC to be delivered upon is a critical issue that needs to be addressed. This could be addressed through the development of quality standards for the operation and functioning of these committees by the DOE and issued to all Local Authorities for adoption as standing orders.

3.1.2 Attendance at LTACC meetings

There are issues of attendance with both the Traveller representatives and the elected representatives. Reasons for the lack of attendance by Traveller represented were:

- Receiving notification of the meeting on the morning of the meeting
- Where the complex issue of conflict can create difficulties for Traveller participation on LTACCs
- The lack of travel and subsistence available to Travellers who are generally volunteers
- Attitudes towards Travellers at the meetings and through the local media

There are practical solutions to each of the identified difficulties mentioned here. The local authority has a responsibility to forward the agenda and minutes at least a week beforehand or preferably ten days beforehand to ensure that receive the documents in a timely manner.

With regards to dealing with the complex issue of conflict affecting the lives of Travellers and their participation on the LTACC each situation needs a different solution. In Westmeath the Traveller representative from WCDL Traveller project proposed that she would consult with the different family groupings through other meetings, groups and projects in existence on the accommodation issues. This was not supported by the LTACC, which in turn is demoralising for the Traveller representative.

Attitudes effect the participation and attendance at the meetings. An example of this was misrepresentation in the Clare Champion (May 2011) where it reported that the chairperson said "The committee has sat without Traveller representation despite plea after plea" undermines the participation of the two Traveller representatives and one Traveller support worker who have attended. In response to this article Colette Bradley,

"Travellers and community representatives have constructively engaged in the group and advised on the new Traveller plan and this is minuted. This behaviour negatively impacts Traveller engagement and participating in such fora. It also helps to widen the rift between the communities."

Colette Bradley, Ennis CDP

While it is seen that in 18% of LTACCs the elected representatives have good attendance another 15 % have inconsistent attendance.

Further exploration is required into the attitudes of local authority officials and elected representatives as concerns were raised about a perceived lack of interest in improving Traveller accommodation; prioritising other meetings; and lack of political will to deliver culturally appropriate accommodation.

In Donegal the attendance of elected representatives has improved greatly in this term because of a new computerised system of streamlining councillors meetings so they do not overlap. This system could be replicated nationally.

3.1.3 Location of the meetings

The meetings are mostly held in the county or city council offices with the odd exception of a site visit. The option of holding a meeting in the local Traveller group's meeting space was not used in most cases. In Monaghan all meetings are held in the new community centre in Gortkeegan Halting Site. Site visits are useful for the elected representatives to meet with the families and gain a better understanding of the accommodation issues the Traveller families are

facing. Meetings on site would benefit from a walk around to monitor the conditions of the particular site. Rotating meetings between civic offices and Traveller organisation could improve understanding and participation for example in North Tipperary two meetings are held in council offices and two on sites in any given year.

3.1.4 Nomination Process

“Four Travellers were handpicked by the local authority but they don’t attend, while the two Traveller representatives nominated by the local group are always in attendance”

A Traveller Representative

For 73% of the respondents the LTACCs used the Traveller groups for a nomination process. This seems to be a successful model. Where the small number of local authorities handpicks Traveller representatives the TAP has not progressed and for the majority of these the local groups are new or not in existence. A representative must be capable of liaising with their community and the LTACC. The link with the community through local groups is paramount and proves successful because of the support given to the representatives before, during and after the meetings.

3.1.5 Training

“There is a lack of understanding of the roles of all the representatives on the committee”

A Traveller Representative

Where training occurs it can lead to a greater relationship between Traveller representatives and local authorities. It provides Travellers with skills to influence within the formal structures. Intercultural training on Travellers was provided to Sligo LTACC giving an understanding of issues faced by Travellers allowed the LTACC to develop a clear, specific, relevant and appropriate Traveller Accommodation Plan including transient sites seldom planned in other TAPs. Although Sligo has not had any delivery of Traveller Specific accommodation since 2009, the Traveller representative feels it is a work in progress and that projects will be completed by the end of the LTACC term.

In North Tipperary, a progressive more approach of the Traveller representatives and the local support worker, as well as the openness of the council officials and the elected representatives led to their request for training from the Irish Traveller Movement. Subsequently, along with the “community minded nature of the elected representatives and council officials the committee is more tolerant”, (A Traveller representative) Travellers are “more ready” to participate and negotiate. The chair of the LTACC is a Traveller supported by the local Traveller group. The

LTACC developed new terms of reference which states that if a person misses three meetings

they will be written to and asked to step down from the committee.

3.2 Monitoring the Delivery of TAP through the LTACCs

"We wanted Travellers to feel like human beings during the process of applying for accommodation, waiting for accommodation and being allocated accommodation"

A Traveller representative

The formal operations of the committee interlink with the progress and delivery of the accommodation plan. As a starting point the majority of respondent stated that there was no agreement in process used in the assessment of need (AON). A process for carrying out the assessment of need was predominantly not agreed in the previous LTACC term. The way in which the AON was carried out mostly had the council official/social worker count the number of families using the annual count the applications for housing and their own knowledge of the families. While this tells a certain story it does not necessarily give an accurate picture of the Traveller family needs, and this is demonstrated by the growing overcrowding in sites and the numbers of families in private rented accommodation. Guidelines on how to carry out an assessment of need jointly with the local Traveller groups would help in this process for the future. Currently there is a lack of these guidelines.

There is a problem with the delivery of the programme when 62% of local authorities did not implement their TAP. There is evidence that the programmes without specific targets had no monitoring system in place for use at the LTACC. The current format does not have an effective monitoring system in place it is without clear targets that are specific, measurable and attainable within the timeframe of the LTACC term and the TAP plan. 12% had no targets at all. Therefore in those cases the question arises as to how the TAP could be monitored at all.

Despite the fact that 67% of the Traveller Accommodation Plans had specific targets 62% of local authorities had no delivery of their programme. This would imply that Traveller representatives have little or no involvement in the implantation of the programme.

All the relevant issues raised need to be addressed constructively. They are often the most difficult issues such as conflict, lack of political will, budget constraints, planning being held up with the blame falling between the local authority and the Department of Environment, Heritage, Community and Local Government. This latter issue leaves Travellers experiencing falling between two stools. Conflict can paralyse a committee not allowing all parties to enter into a

constructive dialogue. Other work the Irish Traveller Movement has taken on is regarding conflict especially between Travellers and local authorities. IT shows the need for a new way to communicate. This needs further exploration and a commitment from all parties.

3.3 Reporting Mechanism

Our analysis is that there is a need for the county or city manager to have a greater link with the LTACC, not to receive minutes that can be glanced at but to attend one meeting annually to help overcome the barriers and blocks to the implementation of the TAP. With the greater the relationship between the LTACC and the Interagency Group as well as the Strategic Housing Policy Committee there will be wider support for the implementation of the programme. Council officials should also attend the IAG and Traveller representatives should sit on the SHPC as with Donegal and South Tipperary. The involvement of Traveller representatives in setting the agenda will help in the ownership of the work of the committee. An agenda sent out two weeks in advance of the meeting is recommended because there would be greater participation of Travellers if they are prepared for the meetings.

3.3.1 Relationship between the LTACC and the Inter-Agency Group ⁸

The IAG strategy document has been adopted by the LTACC, it outlines that its main objective is the participation of Travellers rather than assimilation of Travellers.

Michael McDonagh, Meath Traveller Workshop

In Meath the relationship with the Inter-Agency Group has influenced the culture in the LTACC meetings. Again, in South Tipperary the relationship with the IAG is useful in feeding into the LTACC to move the Traveller Accommodation Programme forward. "There is willingness around the table" (Margaret Casey, South Tipperary).

Also there is concern that the Traveller agenda is slipping down because senior figures from the IAG are pulling away from the meetings so there is little influence outside of the Traveller representatives on the progression and implementation of the Traveller Accommodation Plans.

3.4 Behaviour at meetings

⁸ The Interagency Groups operate under the auspices of the County/City Development Boards (CDBs) has a key focus for the implementation of the Report of the High Level Group on Traveller Issues

3.4.1 Effectiveness of the LTACC Chairperson

In both Kerry and Donegal the chairperson has been a Traveller representative. In both cases the chair felt that it would be useful to rotate role between an elected representative and a Traveller representative or another suggestion is to have an independent chair. One reason is because the voice of the Traveller representative is lost in the chairing of the meeting due to the responsibilities of the chairperson. On the other hand the role of the Traveller chair has helped the committee greatly and been able to influence policy on homelessness, and other Traveller specific issues. There is an agreement that the role should be rotated, but generally relationships improved by the position of the chair being with the Traveller representative. The council officials and elected representatives can see the professionalism in the Traveller chair and are getting a greater awareness of cultural issues for Travellers.

If an independent chair was placed in the position of chair they would need to have an awareness of Traveller issues.

3.4.2 Involving Travellers and Behaviour at the Meetings

“Some of the councillors hardly speak at all so it can be hard to know if they are informed. One fell asleep in a meeting.”

A Traveller representative

The experience of 58% of respondents at LTACC meetings has been that there is a lack of understanding of Traveller culture, the nomadic way of life and Traveller accommodation requirements. Not only has this been the experience but the feeling is that there is little interest in these and in the improvement of Traveller accommodation by and large by the local elected representatives and some council officials.

When at meetings councillors answer their phones and talk over the meeting there is an effect on the Traveller participation. In situations like this it is understandable that the Traveller representatives feel it is impossible for Travellers with the attitudes of councillors. Some meetings can be turned into a complaints committee by councillors for settled people's generalised complaints against the whole Traveller community. Travellers can feel at meetings they may have to defend themselves rather than discuss the plan

At meetings when dealing with particular issues council officials say it is a policy issue and when brought up under policy it is said that the LTACC is only a consultative committee. Situations like these create mistrust and disempowered the Traveller representatives who may be making constructive suggestions.

Another challenge is the turn-over of local authority staff which can make it difficult to develop relationships between staff and Traveller representatives and Traveller groups.

On the other hand, in LTACC meetings such as in South Tipperary, the Traveller representatives feel that it is a good space for having a good debate that leads to decisions and actions in the implementation of the TAP.

3.4.3 Supports for Travellers

"We were the most knowledgeable people on Traveller Accommodation around the table...yet we often left the meetings feeling dismissed, deflated and disrespected. As a community worker, it was difficult to support the participation of volunteers when I myself felt undermined and disrespected. It was a truly humiliating experience at times, not one for the fainthearted."

Brigid Quilligan
Irish Traveller Movement

To garner a greater understanding of Travellers and their accommodation a suggestion of having meetings in halting sites or group housing schemes instead of in the local authority offices. If this was not possible another option is to have a site visit planned into the annual target for the LTACC.

As most of the Travellers are volunteers it is costly for them to travel to the meetings. In some cases, like Wexford, the local authority pays travel expenses. This is useful particularly in larger more rural local authority areas. Childcare costs are another difficulty for the Traveller representatives.

A local infrastructure of support to Travellers through a local Traveller support group has been useful in providing support to Traveller representatives and the community as a whole in sourcing appropriate accommodation. Where there has been no group or no dedicated worker such as in Cavan there has been challenges either in attending meetings or getting further support such as training for the development of skills in attending the LTACC meetings. Some LTACCs (Louth and Roscommon) have put up barriers to Travellers for their support by refusing to allow the local Traveller development worker to attend meetings without a major lobby. The role of the development worker is a supportive role for preparation and debriefing after the meetings. They help in the identification of the issues and priorities for the Traveller

representatives and in the feedback to the Traveller families in the numerous sites, group housing schemes, private rented and local authority standard housing.

3.5 Business and Progress of the Meetings

3.5.1 Link between the Understanding of Traveller Issues and the ability to implement the Traveller Accommodation Plans

The link between the understanding of Traveller issues and the ability to implement the Traveller Accommodation Plans seems evident from the Figures 14 and 16 under the Business and progress of the meetings. With 58% of respondents feeling that the understanding of Traveller issues is not good and 73% of respondents stating that the ability to progress the implementation of the Traveller Accommodation Plans is not good it is evident that there is some link. 48% of LTACCs are stated to be not good in both their understanding of Traveller issues and their ability to implement the Traveller Accommodation Plans.

The barrier to progression of the TAPs lies with the lack of willingness to understand the Travellers and their culture, the nomadic way of life and Travellers as an ethnic minority. In the 6 % of respondents where there is a good understanding of Traveller issues, half of these have implemented the TAP while 9% had processes that were inclusive such as a joint process of the assessment of need.

Table 2: Correlation between Understanding Traveller issues and ability to progress the implementation of the TAP

Count of Understanding of Traveller issues	Ability to progress the implementation of the TAP		
	Good	Not good	Grand Total
Understanding of Traveller issues			
Good	7	7	14
Notgood	3	16	19
Grand Total	10	23	33

- Of those 14 LTACCs having an understanding of Traveller Issues that was 'good', 7 (50%) were also rated as having an ability to progress the implementation of the TAP that was 'good' or 'very good'.

- Of those 19 LTACCs having an understanding of Traveller Issues that was rated as 'not good', only 3 (16%) were also rated as having an ability to progress the implementation of the TAP that was 'good'.
- This shows a strong correlation between the two variables. (According to our study, LAs which scored 'good' for 'Understanding of Traveller issues' were three times more likely to also score 'good' on 'Ability to progress the implementation of the TAP')

3.5.2 Link between the Knowledge of the Traveller Accommodation Plans and the ability to implement the Traveller Accommodation Plans

Thirteen (39%) LTACCs stated to not be good on both the knowledge of the TAPs and the ability to implement the TAP. Those thirteen (39%) include Galway County, Kerry, Kildare, Kilkenny, Longford, Louth, Mayo, Westmeath, Wexford, Dublin City, Limerick City and Waterford City.

Where there is a very good knowledge of the TAPs there is a perceived ability to progress the plans: South Tipperary, Meath. There is a lack of accountability when there are no positive outcomes for the Traveller Accommodation Programmes

4. Recommendations

The Irish Traveller Movement recommends the following in order to address the issues identified in the report:

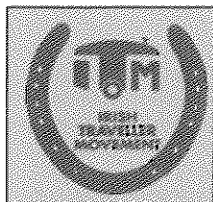
In order to tackle the fundamental problems identified in the report an amendment is required to the Housing (Traveller Accommodation) Act, 1998 to provide for greater powers to be attributed to the NTACC to monitor and ensure the delivery of TAPs.

The role of the Traveller Accommodation Unit within the Department of the Environment needs to be strengthened to enable it to take on a direct role in addressing the lack of delivery of the TAPs.

Quality standards need to be developed and issued by the Minister to all local authorities to adopt and to address the problems in the effective operation of the LTACCs. These standards would reflect best practice in how LTACC should operate such as role of chair, requirements for meetings, monitoring functions and accountability.

Training should be put in place and delivered to LTACCs to support the implementation of the above recommendations.

APPENDIX 1



ITM TEMPLATE REPORT OF OPERATION OF LTACCS

GROUP / LTACC

YEAR: Since June 2009

Operation of LTACCS

Frequency of Meetings

Attendance at Meetings

Location of Meetings

Nomination Process

Implementation for year

Process used to carry out Assessment of Need.

Was there agreement that this process was accurate?

Delivery of accommodation:

New

Refurbished

Change of Usage

Review

What issues were brought to the LTACC by the local group?

Were these dealt with and how effectively?

If Annual Targets were not met what were the reasons for non delivery.
Is there a process for reporting to City/County Manager?

Do you receive the agenda and minutes before each meeting?

If yes, is it:

More than one week before?

Less than one week before?

How do you influence the agenda?

Are the Minutes of the meetings accurate i.e. do they reflect all that was discussed?

Please tick the box that best describes the behaviour at LTACC meetings

	Very Good	Good	Not good
Understanding of Traveller issues			
Attitude to Traveller Reps			
Attitudes to other Reps			
Working Relationships			
Effectiveness of Chairperson			

Please tick the box that best describes the business and progress of the meetings

	Very Good	OK	Not Good
Frequency of meetings			
Attendance at meetings			
Understanding of Traveller issues			
Knowledge of Traveller Accommodation Programme (TAP) by members			
Ability of members to progress the implementation of the local TAP			

Any Other Comments:



**Summary Report on the Operation
and Effectiveness of the Local
Traveller Accommodation
Consultative Committees
By the Irish Traveller Movement
June 2009 – December 2010**

For the National Traveller Accommodation Consultative Committee
April 2011

Rational

The National Traveller Accommodation Strategy has been in place for twelve years, since 1999. All 34 Local authorities have produced Traveller Accommodation Plans and each local authority has a Local Traveller Accommodation Consultative Committee (LTACC). The National Traveller Accommodation Consultative Committee recognised a need to identify how these are being operated. The Irish Traveller Movement (ITM) was requested to examine the operation and effectiveness of the Local Traveller Accommodation Consultative Committees (LTACCs), from a Traveller organisations perspective without drawing national generalisations, but rather with specific reference to individual local authorities. ITM is particularly well placed to carry out this research because of our relationship with our members who sit on the Local Traveller Accommodation Consultative Committees.

The National Traveller Accommodation Strategy was put in place in 1999 with the establishment of the NTACC. Both this and the Housing (Traveller Accommodation) Act 1998 were seen by Traveller organisations as a significant step towards delivering on Traveller accommodation because it was to carry out an assessment of needs of Travellers and publicly committed the Local Authorities to meeting those needs. As well as providing an opportunity for Traveller and Traveller organisations to become directly involved as positive steps towards improving the accommodation situation of Travellers nationally. The LTACCs were established in 1998, they were seen to have the potential to monitor the delivery on Traveller accommodation and also provided an opportunity for Travellers and Traveller organisations to become directly involved in discussions with Local Authorities and elected representatives on accommodation issues.

Methodology

The research presented in this report is based on the questionnaire attached in Appendix 1. It was carried out in the latter part of 2010 and in early 2011 with Traveller organisations based in each local authority area. The interviewees were selected primarily on the basis of their being Traveller representatives on an LTACC. In the majority of cases the questionnaire was filled in by phone interview with exceptions such as Dún Laoghaire Rathdown where the representatives filled it in as a collective. In County Limerick, the Traveller representatives were not available for interview and therefore a council official was interviewed. In one case (Cavan) there were no representatives available to complete the form. The questionnaire results were cross referenced with findings from the Traveller Accommodation Plans as adopted by April 2009. This report presents how LTACCs have operated from June 2009 to December 2010, during the third and current LTACC term.

The Role of the LTACCs

Under the Housing (Traveller Accommodation) Act, 1998, each local authority is required to develop and implement a Traveller Accommodation Programme (here after referred to as TAP). The LTACC has a specific role in relation to TAPs which is to advise on:

- **the preparation of the TAP,**
- **monitor the implementation of the TAP,**
- **to advise on the management of Traveller accommodation,**
- **to provide a liaison between Travellers and the local authorities,**
- **to help with the annual count and assessment of needs.**

Guidelines were developed by the National Traveller Accommodation Consultative Committee on the operations of LTACCs were developed in 2001 and circulated to all Local Authorities. These guidelines set out the method of operation for LTACCs. While each committee should determine its own methods of operation the committee should:

- agree a regular schedule of meetings, the frequency and regularity of which should be agreed at the start of each calendar year,
- consider different days, times and places for meetings to facilitate its members,
- decide on a quorum for its meetings having regard to the requirements in relation to membership of committees as set out in Section 22 of the Housing (Traveller Accommodation) Act, 1998;
- agree on basic matters such as a prohibition on the use of mobile phones at meetings;

Key Findings

Please see the Report on the Operation and Effectiveness of the LTACCs (2009 – 2010) for full background and reasoning to the key findings:

- Just over half of LTACCs have a clear mechanism for reporting
- Just over half of all LTACCs meet quarterly
- 58% say they received the agenda more than one week before the meeting
- LTACCs with a good understanding of Traveller issues are three times more likely to be able to implement their TAP
- 8 out of 10 LTACCs meet in council offices
- Four (12%) local authorities have directly chosen the Traveller representatives for LTACCs
- While twenty-two (67%) TAPs had specific targets, twenty (62%) of LTACCs had no delivery
- Nineteen (56%) of Traveller representatives were not in agreement with process of assessment of need
- Halting sites is the issue most raised at eleven (33%) of LTACCs

- Of all issues raised at meetings the most frequently raised issues relate to provision or lack of provision of culturally appropriate accommodation
- Despite negative publicity only five (15%) raised anti-social behaviour as an issue.

Recommendations in Focus

1. Rotate meetings between council offices, sites and Traveller group offices, for example in North Tipperary where they hold two meetings in the council offices and two on different sites annually.
2. If this is not possible, plan an annual site visit in the LTACC terms of reference, which has been included into plans for Galway County, Kerry, Limerick County and Longford.
3. Involvement of Travellers in setting the agenda, for instance by contacting the representatives before sending out the agenda. There is generally communication between the council staff and Traveller representatives. Issues arise between meetings and it is recommended not to depend on setting the agenda from the previous meeting because there should be set standing orders such as reporting on the Traveller Accommodation Programme, communications between the Interagency Group and the Strategic Housing Policy Committee.
4. Agenda and minutes could be circulated 10 days before the meeting so that representatives may have time to prepare before the meeting.
5. Replicate the good example from Donegal with the computerised system of streamlining councillors meetings nationally.
6. Having a strong link with the IAG and SHPC helps influence to progression and delivery of the TAP (see recommendation in focus #3).
7. All LTACCs would benefit from the attendance of the local Traveller support worker for example in North Tipperary.
8. Intercultural training for all the LTACC and training on roles such as in Sligo.
9. Guidelines on clear terms of reference, again in North Tipperary.
10. Guidelines on how to carry out a joint assessment of need using an example such as in Wicklow LTACC.

11. Monitoring system of the TAPs at LTACCs such as in South County Dublin through the use of a clear template.
12. Further exploration and commitment from all parties into new ways of communicating. The NTACC may need to provide guidelines on how best to record the minutes of the meeting so that not only decisions made are recorded but how the decisions are made and any dissension is recorded.
13. Chairperson role should be defined by each LTACC using the guidelines on the operation of the LTACCs developed by the NTACC in 2001. The guidelines recommend that the Chair should be reviewed after two years. It is recommended that the role of the chair could rotate annually between a public representative and a Traveller representative. Once again, where the Traveller may not have had experience of chairing, having a support worker on the LTACC such as in North Tipperary would give the Traveller representative an opportunity to chair.

Overarching ITM Recommendations

The Irish Traveller Movement recommends the following in order to address the issues identified in the report:

In order to tackle the fundamental problems identified in the report an amendment is required to the Housing (Traveller Accommodation) Act, 1998 to provide for greater powers to be attributed to the NTACC to monitor and ensure the delivery of TAPs.

The role of the Traveller Accommodation Unit within the Department of the Environment needs to be strengthened to enable it to take on a direct role in addressing the lack of delivery of the TAPs.

Quality standards need to be developed and issued by the Minister to all local authorities to adopt and to address the problems in the effective operation of the LTACCs. These standards would reflect best practice in how LTACC should operate such as role of chair, requirements for meetings, monitoring functions and accountability.

Training should be put in place and delivered to LTACCs to support the implementation of the above recommendations.

10 SEP 2013 10.5.13

Tallaght Traveller Community Development Programm

Recommendations TAP Submission for 2014 – 2018

Background

Tallaght Traveller CDP has taken a proactive role over the last 14 years on the mission statement “Travellers Rights Are Human Rights”. The key stone for any family is accessibility to Quality Housing which in turn enhances quality of life giving rise to all local amenities such as Health Care, Education, Shops, ect.

For Travellers Cultural Identity and recognition of customs are very strong, Equality still remains at the forefront for Travellers and the inability of the settled communities to recognise or accept the Travelling community is always problematic, to most of the issues Travellers are facing on a day to day basis & dealing with public services.

Statement of Strategy

The Fourth TAP should be bound by SMART principles, Specific, Measurable, Achievable, Relevant and Time bound. These should be stated within the strategy statement and reflected throughout the detail of the TAP. This can be achieved through setting specific targets and timeframes for both the delivery of accommodation, and for the programme of improvements to pre-existing Traveller accommodation service.

TTCDP believes that rolling the developments which were not developed in TAP 2009-2013 in Principle seems the logical thing to do.

Tallaght Travellers CDP will continue to work with the Local Traveller Accommodation Consultative Committee as long as it remains open and transparent in its operations and which are inclusive for all Travellers. TTCDP would like to take this opportunity in congratulating all Travellers, TAU staff and councillors for their roles in the two sub groups of the LTACC which are Management & Maintenance of sites and the T.A.P sub groups. Both which are new initiatives are working very well with good representation of Travellers.

Tallaght Traveller CDP would be recommending that the voluntary housing agencies are invited onto the LTACC & sub committees along with the County Manager in order to bring new experience & ideas to the table.

TAP 2014 - 2018

Under the following categories, New Developments, Redevelopments & Infill Developments the 2014 – 2018 TAP is as follows,

1) NEW DEVELOPMENTS

RATHCOOL	10 X GROUP HOUSES
ADAMSTOWN	10 X 3 GROUP HOUSES AND BAYS
BUSTY HILL	8 X BAYS
BLACKCHURCH	10 X BAYS
BRITTAS	10 X BAYS

The reality this year with SDCC having been allocated €50,000 for capital builds for 2013 and the current financial circumstance with the sovereign debt Ireland currently finds itself in, none of the above five are tangible within the model of SMART principles or indeed TAP 2014 – 2018.

2) Under Category of Redevelopments

Belgard Road	3 x Group Houses
Lock Road	6 x Bays and one House
Oldcastle Park	Upgrade / Redevelopment

Belgard Road is currently waiting on the Dept of Environment to authorise the necessary funds. Otherwise it has been through the relevant planning requirements and has the full support of SDCC chamber.

Lock Road is considered an emergency site, but plans have been developed which have been signed off and South Dublin County Council who are actively trying to engage with the residents to further the development.

Oldcastle residents are actively engaged with the TAU and it looks very positive re the upgrade.

TTCDP believe the Redevelopments are very attainable and in line with model of SMART principles.

3) Category Infill Developments

BALLYOWEN	5 X BAYS
OWENDORE HAVEN	2 X BAYS
HAZEL HILL	2 X BAYS

These are and remain no change to date.

TTCDP refer to page 8 of the 2009 – 2013 TAP. Looking at the progress of the last TAP 2009 – 2013 to date 39 of the 177 units required have been built. Twenty three of the original 177 families opted for social housing leaving a short fall of 115 units not built.

TTCDP does not have an answer as to the whereabouts or the circumstance of the families and the variance in the figures. TTCDP believe if the model of SMART principles had been applied to the 2009 – 2013 TAP more accurate and transparent outcomes would now be assessable.

TTCDP will remain positive in the knowledge that if the TAP 2014 – 2018 uses the model of SMART principles all of the 64 Families identified through the Housing needs assessment 31st March 2013 in need of Traveller Specific accommodation should be placated.

This will be assisted by the joint submission from TTCDP and Clondalkin Traveller CDP to the LTACC on the 11th July 2013 meeting of the LTACC which looks to target & identify 16 families in the first year of the new TAP from the current list and work in cooperation with the families to address their specific housing requirements.

Transient Accommodation

There has been no change in the status quo. TTCDP would encourage the new County Manager of South Dublin County Council to take the lead here as no other local Authority have the will to forward this project, which will only work if all local authorities nationwide are prepared to move forward on the initiative. Tallaght Travellers would like to see this as a priority piece of work in the TAP 2014 – 2018.

Interagency Traveller Strategy

There are two levels to this. Level one line managers meet on a quarterly basis and in principle are to work as a collective on submissions / actions made from each agencies involved which in turn formulate a strategy one to ten where each agency is committed to a task. The reality is that these meetings serve more as a frontline Network meeting where each organisation in attendance gives an update of what is new. TTCDP value the opportunity to meet and share relevant information with all the agencies as it benefits the Health & wellbeing of Travellers.

Level two is a higher level group with senior executives from each of the agencies meeting on a quarterly basis. Unfortunately there are no Traveller's permitted to participate on this group. Tallaght Travellers are concerned as to the role and relevance of the group given there are no Travellers permitted and there for would consider it flawed. To this end TTCDP are not in a position to engage with a strategy which marginalises the very people it is meant to serve.

Homeless Policy

Tallaght Traveller CDP have concern in relation to policy or lack of Policy when a family presenting as homeless and in crisis, find the consultation process leading to conflict thus staff feel intimidated and the parents or parent finding themselves barred from the homeless unit and in some cases incarcerated. This has the effect of leaving the family in limbo. Tallaght Traveller CDP would suggest that all staff are trained to work within a low

Treshold environment and in the interim an intermediary or mediation service be utalised and incorporated into policy where local authority staff feel they cannot work with a family.

Allocation of Accommodation

Choice Based Letting is an excellent initiative and for those who can read write and have access to a computer the sky is the limit. Unfortunately most of the Travellers on the Housing list don't have these skills or access to a computer. Tallaght Traveller CDP would suggest initiatives are run in conjunction with all the voluntary housing agencies, C.I.Cs, Traveller CDPs, Libraries, where all the agencies could come together to design a programme that would enable Travellers to access the service in a more friendly way.

Provision of Accommodation for single Travellers

Tallaght Travellers CDP is very concerned that the TAU has stated that it does not provide accommodation for single people. This is discriminating and is quite a substantial equality issue which TTCDP believe South Dublin County Council should be at the forefront of amending and developing policy to overcome this issue.

Do we know how many there are ? and would it be possible to set a target to house x over the span of the new programme.

Medical Priority Cases

Of the 180 people listed on the Medical Priority list 15 are Travellers. Most of whom have spent between 3 & 7 years waiting on specific

accommodation. Tallaght Travellers would look as a matter of priority that all these people are identified and included in the in TAP 2014 – 2018.

Budgets

Tallaght Traveller CDP is looking that all monies assigned from the Department Of Environment to South Dublin County Council for Traveller Accommodation be presented at the LTACC meetings. This should include Maintenance, Grant submissions, Capital projects and any other allocations from housing. This way all building programmes identified in the TAP will be measurable through SMART principles.

Caravan Loan Scheme

Is no longer in existence. However there is scope to research a new initiative which would see monies form rent allowance, which is allocated through the Department Of Social Protection used to secure Trailers for Families looking to reside in Residential Caravan Parks.

There is huge savings to be made. The House Hold Budget Scheme which is run by An Post on behalf of the Minister for Social Protection would be the ideal conduit for Families to source a loan for a trailer with the repayment been deducted at source. There would be no onus on the Local Authority to purchase the Trailer. Tallaght Traveller CDP would ask that this be included in the new TAP as a piece of work for the LTACC to do in conjunction with the Money Advise & Budgeting Service.

Tenants Handbook & DVD

Currently the Housing Department of SDCC is developing a new Tenant hand book. Tallaght Traveller CDP would suggest that a DVD be made. Where all the relevant trades / jobs mentioned within the tenants hand book are displayed on DVD with a step by step guide which would be oral and visual and would aid those who cannot read or write. The hand book and DVD should then become part of a Tenants Induction prior to signing a Tenancy Agreement. This could be done with all future tenants of South Dublin County Council.

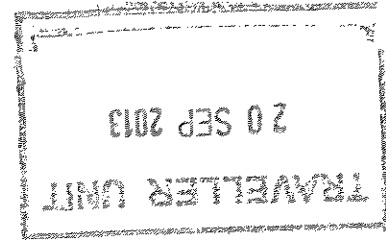
Tallaght Travellers CDP in conjunction with Clondalkin Traveller CDP & the Irish Traveller Movement will be conducting one to ones with all Traveller Families in the coming months. We will be in a better position to share our findings then.

Tallaght Traveller CDP would like to thank all the staff in the Traveller Accommodation Unit of South Dublin County Council, All members of the Local Traveller Accommodation Consultative Committee, Clondalkin Traveller Group and all Travellers who have participated in the roll out of the 2009 – 2013 TAP and sub committees of the L.T.A.C.C.

C.T.D.G.
ENTERPRISE



TRAVELLERS
RIGHTS.



**Clondalkin Travellers Development Group
Submission in respect of the
South Dublin Traveller Accommodation
Programme 2014-2018**

**Recommended Strategies for the successful
delivery of the South Dublin Traveller
Accommodation Programme 2014-2018**

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INTRODUCTION

Clondalkin Travellers Development Group (CTDG) was established in 1989 to address the needs of Travellers in the Clondalkin and surrounding areas. CTDG is a partnership between Travellers and settled people working from a community development approach which seeks to bring about change in society by challenging structures and policies that create inequalities. It is a rights based approach which values the distinct social, cultural and economic needs of Travellers as a nomadic group in Ireland.

One of its key areas of work is developing policies and strategies to address the accommodation issues affecting Travellers. Such policy development is drawn from Traveller's participation within every level of the organisation and ongoing consultation with Travellers in Clondalkin and the surrounding areas.

Many commitments have been given at a national level to address the accommodation needs of Travellers. The framework for Traveller policy issues are embodied within the Report of the Task Force on the Travelling Community (1995) which contains a series of key recommendations in relation to a range of Traveller issues, including accommodation.

Since the publication of the Task Force report progress has been made with the introduction and implementation of the National Traveller Accommodation Strategy (NTAS). The strategy provided for the introduction of the Housing (Traveller Accommodation) Act 1998, which enshrines in law the requirement of local authorities to provide culturally appropriate accommodation in all its forms, including transient accommodation. The Act further requires that local authorities, following a consultation process, to prepare and adopt accommodation programmes to meet the existing and projected accommodation needs of Travellers in their areas. The first programmes covered the period 2000–2004, the second ran from 2005-2008 and the third and current programme ran from 2009-2013.

CTDG is committed to working in partnership with South Dublin County Council, Tallaght Travellers Community Development Project, elected representatives and other key stakeholders to address the accommodation issues affecting Travellers and the delivery of Traveller specific accommodation in the county. CTDG has always had a very proactive role on the Local Traveller Accommodation Consultative Committee (LTACC) and continues to remain deeply committed to this work.

CTDG were invited by South Dublin County Council in accordance with the Housing (Traveller Accommodation) Act 1998 to make a submission with regard to the preparation of the new Traveller Accommodation Programme for the period 2014-2018. It is intended that this submission will inform the development of the new programme.

This submission will refer to the main elements of the current 2009-2013 Traveller Accommodation Programme, provide some analysis of those elements and will contain recommendations going forward for inclusion in the next programme.

Section Two: Preparation of the Programme & Establishing Targets

The third TAP should be bound by SMART principles, Specific, Measurable, Achievable, Relevant and Time bound. This should be reflected within the programme through the setting of targets and timeframes for both the delivery of accommodation and service improvements.

In line with *Circular Housing 26/2013* issued by the Department of the Environment, Community & Local Government on 02.08.2013, CTDG also recommends that specific implementation targets are included that are realistic and achievable. This should also include expected timeframes, outcomes and anticipated challenges to implementing the programme with specific mechanisms to deal with those challenges. CTDG feels very strongly that it isn't satisfactory to merely use funding and budget difficulties for not implementing the programme. It should be accepted and acknowledged that funding will remain the biggest challenge going forward and the programme should be developed in a realistic way with achievable and viable targets. The Minister also states this but also adds that programmes are five year plans which facilitate the establishing of longer term goals. Setting specific implementation targets should underpin the entire programme and should not just include proposed construction projects but also other aspects of the plan including transient sites, caravan loans/grants, medical cases and so on.

The minister has also directed that a review take place not later than 31st December 2016. CTDG recommends that the programme, as well as referring to the review, should also include specific details on how that review will be carried out and how Travellers will be consulted and included in the review. Again as the minister directs, any changes to the programme should be subject to the same requirements and procedures including consultation with Travellers.

SDCC and LTACC should review where the current difficulties in delivering the programme that emerged in the Clondalkin area and address these within the next programme. For example, the difficulties in delivering on time in Clondalkin and administrative delays should be examined and addressed.

In addition there needs to be clear and specific figures around current needs and projected needs and that there are built-in monitoring mechanisms in the programme.

CTDG also recommends that the programme includes specifically mechanisms that address accountability where elements of the programme are not implemented and that ultimately the County Manager is accountable for the delivery of the programme.

Section Three: Consultation with Travellers

The 1998 Act together with *Circular Housing 26/2013* and the department's memorandum on the preparation and adoption of the programme are very clear on the requirements to consult with Travellers.

A key issue that has consistently emerged was that the expectations of Travellers and Traveller organisations on what constitutes consultation with Travellers about Traveller accommodation can be significantly different from that of the local authority.

It could be considered that consultation means that Travellers were communicated with early on in the process so that they were informed as to the location and projected timeframe for the delivery of the units. In fact Travellers and Traveller organisations mean consultation to be involved as equal partners from the design stage onward, with their views being solicited so as to be taken into account. It also means consulting with all Travellers in the county as to their current accommodation needs and the projected needs going forward.

CTDG recommends that as part of the consultation process which should follow in the next 2-3 months that the questionnaire adopted by the ITM be used to interview every Traveller family in the county. CTDG will support the local authority in this work but the lead must come from the local authority and LTACC.

The LTACC should examine and adopt the guidelines produced by the NTACC on effective consultation in relation to the development of Traveller accommodation and implement its recommendations.

CTDG also acknowledges the work and the huge efforts of the Traveller Accommodation Unit (TAU) earlier this year when carrying out the national Housing Needs Assessment.

Section Four: LTACC Participation

CTDG wishes to acknowledge the very significant efforts of the LTACC on setting up alternative structures to facilitate participation of Travellers in its work. CTDG feels very strongly that South Dublin LTACC has been very proactive in this regard particularly when it has been reported that so many other LTACC's are functioning poorly if at all.

CTDG recommends that the establishment of the sub-committee structure and it's terms of reference are 'copper fastened' into the programme and even further expand their remit and functionality.

Section Five: Construction Programme

The 2009-2013 TAP stated that the construction programme will take place in 3 phases:

1. New developments as a result of the identification of green field sites and which were a rollover from the 2005-2008 programme
2. Redevelopment of existing temporary sites
3. Infill Developments

New Developments	Proposed Units TAP 2009-2013	Status as at end of TAP 2009-2013
Stocking Lane	10	Completed
Coldcut Road	8	Completed
Newcastle	10	Not Completed
Rathcoole	10	Not Completed
Adamstown	3 x 10	Not Completed
Bustynhill	8	Not Completed
Blackchurch	10	Not Completed
Brittas	10	Not Completed
Redevelopments	Proposed Units TAP 2009-2013	Status as at end of TAP 2009-2013
Turnpike	3	Completed
St. Aidans	10	Partly Completed (5 of 10)
Lynches Lane	3	Completed (commenced construction prior to adoption of TAP)
Ballyowen Lane	10	Partly Completed (Electrical Upgrade only)
Oldcastle Park	20	Not Completed
Belgard Road	6	Not Completed (waiting for allocation of funds)
Lock Road	6	Not Completed
Infill Developments	Proposed Units TAP 2009-2013	Status as at end of TAP 2009-2013
Ballyowen Lane	5	Not Completed
Owendohar Haven	2	Not Completed
Hazelhill	2	Not Completed
Other Development	Proposed Units TAP 2009-2013	Status as at end of TAP 2009-2013
Belgard Park	10	Not Completed

It is important to highlight that most of the proposed new construction was dependent on Part V's and Part VIII's which in practical terms, is dependent on a vibrant economy with a healthy construction sector. Regretfully almost immediately after the adoption of the 2009-2013 TAP, the Irish economic landscape changed very significantly.

Temporary and emergency accommodation was not phased out unfortunately in the current programme which will put pressure on the next programme to deliver on this, that is current needs still have not been met.

The progress of the proposed redevelopments also has had some challenges but CTDG acknowledges that redevelopments can often be very complex given that they concern accommodation that is already being occupied by families.

The electrical upgrade element of the proposed upgrade to the 10 unit site at Ballyowen Lane commenced in the latter half of 2013. While the upgrade is very welcome it is only one part of the upgrade works that need to take place at that site and again while very welcome, it took considerable time, pressure and efforts by all stakeholders to bring that single project to tender stage.

Crucially the proposed redevelopment at Oldcastle Park has not materialised. CTDG has given a commitment to the residents of Oldcastle Park that it will strive to lobby for this to happen.

An essential element of the new programme must contain a strategy that offers real practical alternatives and means to address the current and projected accommodation needs of Travellers in the county that are not exclusively dependent on the private sector.

The local authority does not own nor has no immediate plans to procure development lands at the sites Bustyhill, Blackchurch or Brittas. The site at Rathcoole is dependent on a land swap, the construction of a road network and the development of a local infrastructure before any development can be considered there. Any future development at the Adamstown site is wholly dependent on significant national economic growth and demand for the construction of new homes before Traveller specific accommodation can be developed. The site at Newcastle which contains 10 units and which has long been promised to Travellers in the county and particularly Travellers living north of the Naas road is still dependent on the completion of other housing in that development being completed and sold before the accommodation for Travellers can be acquired. The fact that the builder is in receivership with no firm knowledge of what to expect with regard to that development means that the future of that development is not at all secure. While the identification of these sites is still welcome in any new TAP going forward, the local authority must identify more practical and viable solutions that have some opportunity of addressing the accommodation needs of Travellers in the county during the next TAP period. It is not

enough and isn't satisfactory to base an entire new development programme on sites that may never have any hope of materialising.

CTDG is recommending to South Dublin County Council that the proposed construction programme have 3 tiers to it, that is, a short term strategy, a medium term one and a longer term strategy. Within each of these 3 tiers appropriate new development, redevelopment and infill development would then be identified. CTDG also recommends that specific targets, timeframes, outcomes and potential challenges would be identified. Developing the programme in this way would ensure transparency, accountability and would allow the local authority and the LTACC to use the programme make it into a real working document that becomes a practical and efficient tool.

CTDG would propose, for example, that the green field sites identified and included in the last 2 TAP's under new development that is Bustyhill, Blackchurch and Brittas are more longer term developments, are dependent on too many other variables and are possibly unlikely to be achieved by the end of the programme in 2018. Developments like Adamstown for example, might be more appropriate in the medium term because there is political will to bringing that development to completion. Traveller accommodation in Adamstown may become a reality by the end of the programme. The Newcastle development should be achievable in the shorter term and therefore significant efforts should

Section Six: Redevelopment of Oldcastle Park

In addition to the recommendations already discussed regarding the construction programme CTDG wishes to make a number of recommendations regarding the future development of Oldcastle Park.

The future of Oldcastle Park has never been determined in concrete terms and while its redevelopment has been included in previous programmes no progress has been made in this regard. CTDG remains deeply committed to working with the residents there particularly given that many of them have lived there for at least the last 12 years. Apart from the unofficial sites on the Fonthill Road and which are the subject of legal proceedings, Oldcastle Park remains the last temporary site in the Clondalkin area. It is incumbent on all parties and stakeholders to address the situation in Oldcastle Park as their particular situation is more unstable than most and to be fair the accommodation there has been neglected over the past decade. The site is still considered a temporary site and with the exception of some very welcome repair works recently, is very substandard and the living conditions are exceptionally poor for residents there. CTDG does wish to acknowledge the efforts made by the TAU over recent times to work in partnership with the residents and the organisation in attempting to address some of the challenges that exist not only with the standard of accommodation but with the range of difficult family dynamics that exist among the residents.

CTDG acknowledges that any redevelopment of Oldcastle Park is complex and there are a significant number of matters to consider and for this reason CTDG recommends that a three tiered approach is adopted that is, a short term immediate strategy, a medium term one and a longer term strategy that examines the overall development of the entire lands.

Section Seven: Transient Accommodation Provision

The lack of provision for transient accommodation both in South Dublin and nationally remains to be addressed. As a result of the lack of provision Travellers are moved between counties and countries. There is a lack of cooperation between local authorities to address the movement of families between local authority areas due to annual patterns of movement, violence, eviction legislation and other issues.

CTDG is recommending that SDCC take a lead role in addressing the provision of transient accommodation and include specific strategies in the programme to address this.

Section Eight: Alternative Accommodation Options

All local and housing authorities and other stakeholders in the sector including voluntary housing associations, charities, homeless agencies etc are in the midst of a very changed landscape in terms of availability and delivery of social housing. The very significant decline in available funding has had a direct impact on this and the state's response has been to provide alternative housing support through the private sector. This has been delivered through RAS and longer term leasing options. The minister also refers to this in the *Circular Housing 26/2013*.

This new reality has had a direct impact on Travellers also with increased number of families living in private rented accommodation. CTDG accepts that until Traveller specific accommodation is delivered or until Travellers who have opted for standard housing are allocated housing many families will be living in private rented accommodation in the short to medium term.

The very significant challenge going forward and which CTDG feels must be addressed in the new programme are the difficulties Travellers face in accessing private rented accommodation. There is a shortage of good quality accommodation suitable for families in the Clondalkin/Lucan area in particular and an even greater shortage of landlords/letting agents willing to accept tenants who are dependent on rent supplement support. Even more worrying is that assuming families can get over those challenges, for many, once they mention their surname or the landlord/letting agent realises they are Travellers, they are told the property is no longer available. This issue has been highlighted by the national Traveller organisations and remains a grave concern for Travellers and support organisations going forward.

Given that there is a greater dependency emerging on accessing private rented accommodation and certainly in the wake of reduced capital budgets for delivery of Traveller specific and other social housing/accommodation CTDG wishes to recommend the inclusion of a specific strategy to support Travellers to access accommodation in the private rented sector. Being able to access RAS and other leasing options as referred to in *Circular Housing 26/2013* by the Minister, is dependent on firstly being able to access the private rented sector. The provision of this support to Travellers would facilitate them to access other housing options in the short to medium term while waiting for the delivery of Traveller specific accommodation. CTDG and TTCDP already made a draft proposal to the LTACC on this very issue which was agreed in principal to be given more consideration.

There are a number of barriers that some Travellers face in moving in to standard housing such as isolation, loss of social supports, removal from extended family networks, lack of space for caravans and issues with neighbours. The issue of private top-ups directly to landlords was identified as a problem which caused poverty traps and at times led to a recurring cycle of homelessness causing serious stress and hardship for some Traveller

families. Some people spoke of dual tenancy agreements being drawn up, one for the Rent Supplement application and another one between the tenant and landlord with a higher rent given. The maximum rent payable, or rent cap, under the Rent Supplement scheme for the area does not always reflect the rent landlords ask from prospective tenants, and parents anxious to keep children in local schools and near extended families can find themselves paying over the odds to secure housing in a particular area.

As evidenced and stated above a significant number of Travellers in the Clondalkin have moved into standard housing. This, in many cases is not as a result of an informed or willing choice but in response to poor living conditions and long waiting time for proper permanent Traveller specific accommodation. These families need to be included and reassessed within the next TAP.

Section Nine: Caravan Loans

CTDG acknowledges that in the past the Housing Department and the TAU have provided caravan loans to families in the county through funding that was made available from the DECLG. CTDG also acknowledges that there were challenges in recouping all of the monies due from those loans. In addition CTDG acknowledges that because of funding restraints there is no budget available for caravan loans.

Notwithstanding that, CTDG is gravely concerned going forward about the inability of Travellers to access finance to replace caravans/trailers and that this is in fact forcing Travellers out of both temporary and permanent accommodation provided by the local authority.

While many local authorities have been reluctant to provide modern permanent halting sites and have steered towards the provision of group housing schemes only, South Dublin County Council has been more respectful to Traveller tradition and culture and pursued a policy of providing a mix of accommodation types. Some of the newer developments in the county have been developed with a mix of bays and housing with examples at Hazel Hill, Lynch's Park and Kishogue Park.

The withdrawal of provision of caravan loans has had a detrimental impact on Travellers living in local authority provided halting sites. Travellers are unable to access finance to replace or purchase new caravans/trailers from the more traditional sources e.g. financial institutions. In the past the HSE provided some support in the form of Rent Supplement however these claims have been stopped and despite a number of appeals from this organisation, those claims have not been reinstated. The DSP are adopting a very firm position on the matter and have directed that it is the local authority who have the responsibility for the provision of accommodation and that Rent Supplement only applies to 'bricks and mortar'.

The impact of this is that many families are living in the serviced units on their bays which is clearly not acceptable for obvious reasons and indeed the local authority quite rightly do not permit it either. Ironically Travellers are being forced to leave their current accommodation and seek accommodation in the private rented sector because of an inability to source finance for a replacement caravan/trailer. This also may have an impact on the ability of families to accept vacancies in halting sites in the county.

CTDG wishes to recommend that a strategy to deal with the issue of caravan loans be included in the programme and where finance cannot be made available that there is a clear strategy of how to support families who are unable to access replacement caravans/trailers.

Section Ten: Medical Cases

CTDG wishes to particularly acknowledge the efforts of the Housing Department and especially the TAU in supporting Traveller families who have a family member with a disability who make a preference to continue living in the traditional way in a caravan/trailer. The TAU have been very supportive of applications to the DECLG for disablement grants towards the purchase of caravans/trailers appropriate to the needs of the disabled family member. Applications aren't always successful and many applications are made without being awarded medical priority by the Chief Medical Officer but nonetheless the TAU have engaged their best efforts to secure the grant where possible.

Some families would prefer to live in standard housing as is their choice for their family and their particular circumstances. However support provided by the TAU has enabled some Traveller families to continue living according to their cultural preference in a caravan/trailer. This very much follows the social model of disability and CTDG welcomes this policy and practice.

CTDG would like to recommend going forward that this policy continues and that specifically it is included and reflected in the programme. Moreover that in the development and consideration of any new construction programme that traditional bays and serviced units are constructed to be universally and fully accessible for disabled persons, older people and those with any mobility issues.

Section Eleven: Interagency Strategy

CTDG acknowledges the work of the Interagency Strategy and welcomes being part of the local Interagency Group. It is a very useful space to share information and be made aware of the work of other agencies delivering services to Travellers. It is a good opportunity for networking and learning about the work of others.

It is limited in that the reality is it is merely a space for information exchange. Policy development and decision making takes place at the Higher Level group of which Travellers are not represented. CTDG has always raised issues with this and has been vociferous in how gravely wrong and unjust and against the spirit of what the strategy actually embodies. To date no actual reason, argument or justification has ever being given or presented as to why Travellers have been denied access to the Higher Level group.

CTDG wishes to recommend that this matter is addressed in the new programme and recommends that the LTACC take a lead role in addressing this.

Section Twelve: Tenant Participation Strategies, Conflict & Anti-social Behaviour

Travellers have poor information and a poor understanding of the local authority housing and accommodation procedures. For example, some Travellers who moved in to private rented housing while waiting for Traveller specific accommodation to be delivered thought that the SDCC had discharged their duty to them.

Travellers who had moved in to standard local authority housing were unsure if they were still included within the TAP.

Procedures in relation to application for standard housing are not understood among Travellers in Clondalkin generally. This is an issue which should be addressed through the development of an effective communication strategy for work with Travellers and could also apply to other ethnic minority groups. This work would involve the development of good practice for outreach work to Travellers and for the effective delivery of information.

CTDG recommends that as part of its continued work and development of the LTACC sub-committees that strategies for education around tenant responsibilities, the range of tenancy and tenure types and so on are included in the programme and that specifically there is a mechanism to monitor this.

Supports required for Traveller transition to standard housing both within local authority and private rented. This work should also involve identifying Travellers barriers to accessing the Rental Accommodation Scheme. Developing best practice guidelines in building sustainable communities and within this context responding to anti-social behaviour and the effects of this on the Traveller community.

One of the most significant issues affecting Traveller accommodation in the county is conflict and intimidation from other Travellers and many Travellers are living in extreme fear. They are either being forced from their accommodation or an even more alarming development unable to move from their accommodation because of the strict enforcement of surrendering accommodation and being unable to access the housing list and consequently Rent Supplement support for at least 12 months. Emergency transfer recommendations from local Gardaí Superintendents are rare because Travellers will not report these matters out of fear. This issue is well documented and is of grave concern to Travellers, Traveller organisations and the local authority.

In addition, there are some Traveller specific accommodation vacancies around the county that the local authority report they cannot allocate. Again this is of grave concern given that so many families require accommodation.

CTDG should continue to work with SDCC on further developing best practice in relation to tenant participation and estate management. CTDG should work with SDCC to assist in the

development of best practice in relation to cultural diversity training, policies and practice. SDCC should carry out an independent review of its services to Travellers to identify gaps and devise recommendations to address these. SDCC should work with CTDG on the further development of best practice in tenant participation and estate management.

CTDG is recommending that a mechanism is included in the programme that monitors the reasons why some vacancies cannot be allocated and implements a strategy to manage that going forward. CTDG also recommends that a mechanism be included in the programme that monitors the reasons why families are leaving accommodation and implements strategies to deal with it and manage it going forward.

Section Thirteen: Homeless Strategies

There is an increase in the numbers of families reporting to CTDG who are homeless due to being forced from their own local authority accommodation because of conflict or intimidation from other Travellers. They are reporting being unable to secure private rented accommodation as a result or unable to secure accommodation following termination of a lease while already in private rented accommodation. CTDG recommends that the programme contain a strategy that links directly with the Homeless Services in the county and monitors the numbers of families that become homeless and the reasons why and particularly if those families are waiting for Traveller specific accommodation. If the programme has a mechanism that actively monitors this it would help support the case for funding from the Department. CTDG acknowledges that the local authority will have this data already but the programme needs to reflect a mechanism that it is monitoring the data directly as this relates specifically to the figures for current and projected accommodation needs.

CTDG is also aware of some families that have had difficulty securing help and support from the local authority Homeless Services. People who are homeless are the most vulnerable in society and are homeless often because of addiction issues, mental health problems, violence or conflict and in general have an inability to cope. They often present angry, upset, distressed and very frustrated as a result. The homeless services and organisations working in the sector operate a 'Low Threshold' policy of working, that is, no matter what stage the person is at or how they present, they will never be refused access to a service. The onus is on staff and service providers to be appropriately trained and skilled to deal with individuals and families and the range of issues they might present with. CTDG acknowledges that it can be very difficult and demanding working with families and individuals who are angry, upset and frustrated and also acknowledges that the safety of staff is paramount. CTDG is recommending that the programme addresses this issue of the provision of services and that staff are not only trained to work in a 'Low Threshold' environment but that they also receive additional cultural training that enable them to understand Traveller culture and tradition and to have an understanding of the particular issues that affect Travellers.

Section Fourteen: CONCLUSION

The experience of the last eight years has given new insights in to the barriers that exist to the delivery of Traveller accommodation. The development of new sites and good practice on some issues has also been part of this experience. A shared understanding between Travellers and the agencies of the accommodation issues Travellers face and the impact of poor accommodation is emerging more strongly than before.

It is also acknowledged that progress has been made on the delivery of accommodation in the SDCC area and within Clondalkin. CTDG welcome all of these developments and look forward to a situation where all Travellers in Clondalkin have good quality culturally appropriate accommodation matched by quality accommodation services that meet their needs. CTDG in partnership with all of the agencies will continue to work to tackle the barriers identified to make this vision a reality.

Whilst acknowledging the good work that has been achieved, the focus must now be on the delivery of all the commitments. Not all provision has been achieved as would have been expected by the end of the current TAP. This must be addressed as a matter of urgency. Alongside this, the key issues raised by Travellers regarding consultation, information and communication with SDCC need to be addressed.

There is also a need to ensure Travellers are provided with the most effective and equitable service as in line with SDCC's customer service policies. SDCC envisage that all their customers should be provided 'with the highest quality service in an economic, efficient, effective and equitable manner'.

A package of measures is required to make this a reality for Travellers and other ethnic groups who encounter barriers in accessing and benefiting from key services. However training alone will not deliver this. In order to have significant impact training must be delivered in conjunction with institutional changes in policies and practices that embrace diversity and tackles racism in service provision.

