



**Comhairle Chontae Liatroma  
Leitrim County Council**

**Draft Traveller Accommodation  
Programme 2025-2029**  
Public Consultation Period

**19<sup>th</sup> June 2024 to 14<sup>th</sup> August 2024.**

[www.leitrim.ie](http://www.leitrim.ie)

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## **1. Introduction**

### **1.1 Legal Background**

Under the 1998 Housing (Traveller Accommodation) Act, Leitrim County Council has certain obligations in relation to the preparation, adoption and implementation of a Traveller Accommodation Programme. The provisions of the Housing Act play an integral part in promoting social inclusion and equality and counteracting discrimination that may be experienced by members of the Traveller community.

In summary, Leitrim County Council is required to:

- prepare and adopt a Traveller Accommodation Programme to meet the existing and projected accommodation needs of Travellers in Co. Leitrim.
- allow for public consultation on the preparation of the Programme.
- establish a Local Traveller Accommodation Consultative Committee (LTACC) to facilitate consultation with Travellers.
- secure the implementation of the new Programme.
- include objectives concerning Traveller Accommodation in the County Development Plan.

In December 2023 Mr. Kieran O’ Donnell, Minister of State for Planning and Local Government issued Circular 46/2023 under Section 10 of the 1998 Housing Act directing that the current Traveler Accommodation Programme 2019-2024 be extended to 31<sup>st</sup> December 2024 and that the new Traveler Accommodation Programme 2025 -2029 should be prepared for a five year period from 1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2029. The adoption of the Traveller Accommodation Programme is a reserved function and the latest date for the adoption of the Accommodation Programme is 31<sup>st</sup> December, 2024.

### **1.2 County Profile**

Leitrim is located in the Northwest of Ireland, in the Border Region, and has a population of 35,199 people (2022 Census). Leitrim has three Municipal Districts, Carrick-on-Shannon, Manor Hamilton and Ballinamore. Carrick-on-Shannon located in the south of the county is the largest town in the county, Manor Hamilton is the second largest town, followed by Killough, Ballinamore, Drumshanbo and Mohill.

### 1.3 Local Traveler Accommodation Consultative Committee (LTACC)

In accordance with the provisions of Section 21 and 22 of the Housing (Traveller Accommodation) 1998 Act, a Local Traveller Accommodation Consultative Committee (LTACC) has been established to facilitate consultation between the Council and the Local Traveller Community and to advise on any aspect of accommodation for Travellers. The LTACC plays an important role in the development of the Traveller Accommodation Programme. The views of the Committee have been considered in the preparation of this Programme and implementation of the new Programme will be monitored by the Committee. The membership of the Leitrim Local Traveller Accommodation Consultative Committee is comprised of, four Traveller representatives, six elected Members of Leitrim County Council and three County Council Officials. **(Appendix 1).**

Following the Local Election in June, 2024 – a new Local Traveller Accommodation Consultative Committee will be established for the next five years with membership from the following -Elected Members of Leitrim County Council (6), Traveller representatives (4), Council Officials (3) and a representative from Leitrim Integrated Development Company (1). Having regard to the role of Leitrim Integrated Development Company (LIDC) in working directly with members of the Traveller community in County Leitrim, it is proposed that the new LTACC will provide for membership of one representative from the LDC onto the LTACC committee.

## 2. Policy Statement

### 2.1 Overview

It is the policy of Leitrim County Council to provide quality accommodation based on the distinct needs and circumstances of Travelers who are deemed qualified for, and in need of, social housing support in accordance with – The Social Housing Assessment Regulations 2011.

There are a range of social housing supports that can be provided to Travelers who are on Leitrim County Council's Social Housing Waiting List e.g. Traveler Specific Accommodation, Standard Local Authority Housing, accommodation provided by Approved Housing Bodies, Rental Accommodation Scheme, Social Housing Leasing Initiative, Housing Assistance accommodation and Temporary Emergency Accommodation.

All social housing applicants, including members of the Traveler Community, will be considered for any vacancies arising in accordance with the Council's Allocation Scheme including the allocation of dwellings under the Choice Based Letting Scheme.

Under the Planning and Development Acts, County and City Development Plans and Local Area Plans must include objectives for the provision of accommodation for Travellers. Provisions contained in the Leitrim County Development Plan 2023-2027 are sufficient to realise the Traveller accommodation objectives set out in the Traveller Accommodation Programme 2025-2029.

Leitrim County Council's policy is set out in the County Development Plan 2023-2027 and is as follows:

- Groups with Specific Planning Needs: 'There are a number of groups in society with specific design and planning needs including, children/young people, people with disabilities, older people, ethnic minorities and the Traveller community. The Council recognises the importance of planning for the needs of these groups'.

### 2.2 Inter-Agency Approach

It is also the policy of Leitrim County Council to adopt an inter-agency approach in the provision of services and accommodation to Travellers. This approach is critical, particularly in relation to addressing any special needs accommodation and support requirements. The HSE Public Health and Occupational Therapy

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services are central to this process. Leitrim Integrated Development Company's Traveller Development Worker(s) plays a significant role in liaising with Council staff on a wide range of issues including maintenance requests and their assistance in the delivery of Traveller accommodation and support services is acknowledged. The Council will continue to work collaboratively with Leitrim Integrated Development Company and/or other agencies as appropriate to deliver positive outcomes. The supportive role of other Agencies and their staff in supporting applicants and tenants and advocating on their behalf is also acknowledged. The Council remain committed to continuing to work on an inter-agency basis to support individuals and families and in the broader context to promote the principles of inclusiveness, integration and good estate management practice.

### 2.3 Pre-Tenancy Training

The policy of mandatory Pre-Tenancy Training an important part of the service the Council provides to new tenants. This provides the new tenant(s) with information in relation to their new home, their obligations and responsibilities under the tenancy agreement and the Council's commitment to them as tenants.

### 2.4 Recognition of Traveller Ethnicity



On 1<sup>st</sup> March 2017, there was a statement of Recognition by the Irish State, of Travellers as an Ethnic Group and a formal recognition of Travellers as a distinct ethnic group within the Irish nation. Leitrim County Council recognises Travellers' identity as a minority ethnic group and is committed to promoting equality and inclusion for Travellers living in Leitrim.

### 2.5 Public Sector Duty

The Public Sector Equality and Human Rights Duty ('The Duty') is a statutory obligation for public bodies in Section 42 of the *Irish Human Rights and Equality Commission Act 2014*. Section 42(1) requires public bodies in the performance of their functions, to have regard to the need to eliminate discrimination, promote equality and protect human rights of staff and people availing of their services.

## **2.5 Back up Services & Support**

Leitrim County Council is committed to the delivery of high-quality accommodation and services. The Council employs a Traveller Liaison Officer whose role is to work closely with the Traveller Community in Leitrim to assist them with a range of issues related to their housing requirements and needs including the following:

- Facilitating an appointment-based service in the Housing Office.
- Assistance in applying for Social Housing Support.
- Providing information, support and advice on housing options.
- Advising on the Housing Adaptation Grant and Mobility Aids Grant Scheme.
- Provision of pre and post tenancy support to assist individuals or households to sustain their tenancies.
- Provision of Homeless HAP Place-Finder support for individuals at risk/or homeless.
- More recently, the Tenant-in-Situ Scheme has been used successfully to prevent homelessness.
- Engage with the Traveller Accommodation Unit in the Department of Housing, Local Government and Heritage to access funding streams in the delivery of Traveller Specific Accommodation.
- Collaboration on projects to benefit the Traveller Community e.g. 'Leitrim Pony Riding and Animal Welfare Project'.
- Consultation with Travellers, the Local Traveller Accommodation Consultative Committee and/or other Agencies as appropriate on issues relating to their accommodation needs.

### 3. Review of Traveller Accommodation Programme 2019 – 2024

The TAP 2019 -2024 provided for the delivery of a total of **25 units** of accommodation for Travellers over the five-year period. Delivery was achieved via several social housing options including the allocation of tenancies in Standard Local Authority Housing, Traveller Group Housing, Rental Accommodation Scheme (RAS), Social Housing Leasing Initiative (SHLI), Housing Assistance Payment (HAP) and by the allocation of tenancies in accommodation provided by the Approved Housing Bodies (AHBs). A total of 45 offers of accommodation issued, 34 were accepted and 11 were refused.

**Table 1. Traveller Accommodation Programme 2019 – 2024 –Outputs achieved.**

Accommodation Type	Outputs 2019-2020	Output 2020- 2021	Outputs 2021-2022	Outputs 2022-2023	Outputs 2023-2024	Total Outputs from July 2019 to May, 2024
Group Housing Scheme (Casual Vacancy Arising)	1	0	0	0	1	2
Service Bay (Casual Vacancy Arising)	1	0	0	0	0	1
Local Authority Standard Housing	10	4	9	5	6	34
Rental Accommodation Scheme (including renewal of contracts)	4	1	0	0	0	5
Long Term Leasing (including renewals)	0	0	0	0	1	1
Housing Provided by an Approved Housing Body	0	0	0	1	0	1
Housing Assistance Payment (H.A.P)	0	0	0	1	0	1
<b>Total Delivery (including refusals of offers of accommodation)</b>	<b>16</b>	<b>5</b>	<b>9</b>	<b>7</b>	<b>8</b>	<b>45</b>
* Refusals of offers of accommodation	<b>3</b>	<b>1</b>	<b>5</b>	<b>1</b>	<b>1</b>	<b>11</b>
Net overall delivery of TAP outputs excluding 11 offers of accommodation that were refused.						<b>34</b>



## **4. Public Consultation Process**

### **4.1 Overview**

Leitrim County Council, in accordance with the requirements of Section 8 of the Housing (Traveller Accommodation) Act 1998, gave public notice on 5<sup>th</sup> January 2024 of its intention to prepare a Draft Traveller Accommodation Programme for the period 2025 - 2029 and to carry out an assessment of existing and projected accommodation needs of Traveller families living in County Leitrim.

### **4.2 Public Notice**

Section 8 of the Housing (Traveller Accommodation) Act 1998 requires Local Authorities to undertake a consultation process as part of their preparation for the new Draft Traveller Accommodation Programmes. Notice of Leitrim County Council's intention to prepare a Draft Accommodation Programme 2025-2029 issued on 5<sup>th</sup> January, 2024 to the following:

- The Elected Members of Leitrim County Council.
- Members of the Local Traveller Accommodation Consultative Committee.
- Oireachtas Members.
- Members of the European Parliament (Midlands North-West)
- Adjoining Local Authorities.
- Health Service Executive
- TUSLA
- Leitrim Integrated Development Company
- An Garda Siochana
- Mayo, Sligo and Leitrim Educational Training Board
- Traveller Organisations and Traveller Support Groups.

Notice of the intention to prepare the Draft TAP 2025 -2029 was published in the Leitrim Observer on 10<sup>th</sup> January 2024 and on the Council's website ([www.leitrimcoco.ie](http://www.leitrimcoco.ie)).

### 4.3 Consultation with the Local Traveller Accommodation Committee (LTACC)

The Draft Programme 2025-2029 has been prepared in consultation with the Local Traveller Accommodation Consultative Committee and a number of meetings of the LTACC were held to discuss the key stages in the preparation and adoption of the Draft Programme.

### 4.4 Consultation with members of the Traveller Community

Leitrim County Council is committed to consultation with individual Travellers in relation to their accommodation needs. The Traveller Liaison Officer and other staff from the Housing Department are available to provide information, support and advice to members of the Traveller Community in relation to their accommodation needs.

In preparing the Draft Traveller Accommodation Programme 2025-2029, the following consultation process was undertaken:

- A letter issued to all Traveller households notifying them of the Council's intention to prepare a new Traveller Accommodation Programme together with an Assessment of Need form to be completed and returned. This ensured that each household were given an opportunity to submit additional information considered relevant to their housing need.
- Traveller households residing at Shannonside View, were invited to attend a consultation meeting with the Traveller Liaison Officer to discuss their housing needs.

### 4.5 Submissions received.

Leitrim County Council received six written submissions (**Appendix 2**) in relation to the preparation of the Draft Traveller Accommodation Programme 2025 -2029. Elements of these submissions have been considered by Leitrim County Council for inclusion in the Draft Traveller Accommodation Programme 2025-2029. Submissions were received from the following organisations:

- 1 Leitrim Integrated Development Company.
- 2 National Traveller Health Implementation Group.
- 3 National Traveller Money and Budgeting Service.
- 4 CENA Culturally Appropriate Homes.



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5 Northwest Traveller Health Unit.

6 Irish Traveller Movement/Pavee Point/National Traveller Women's Forum

Not all recommendations contained in the submissions relate directly to the provision of accommodation/housing for the Traveller community, but rather link into a wider approach of inclusion and interagency collaboration.

## 5. Assessment of Need

### 5.1 Traveller Population in Leitrim

Leitrim County Council as directed by the Minister for Housing, Local Government & Heritage, is required to complete an annual Traveller Census to estimate the number of Travellers residing in the county. In May 2024, there are 73 Traveller family's resident in the county and the following table provides an overview of their tenure type:

**Table 2. Profile of Traveller families in County Leitrim**

Profile of Traveller Families residing in Leitrim by Accommodation Type (May 2024)		
Type of Tenure	No. of Households	% by Tenure Type
Traveller Specific Accommodation	12	16.5%
Standard Local Authority Accommodation	39	53.5%
Approved Housing Bodies	4	5.5%
Long Term Accommodation (RAS/ HAP/ Long-term Leasing)	7	9.5%
Applicants on the Social Housing Waiting List	11	15.0%
<b>Total</b>	<b>73</b>	<b>100%</b>

Significant outputs have been achieved under the Traveller Accommodation Programmes over the last number of years to meet the accommodation needs of the Traveller Community in Leitrim.

The Traveller population is primarily located in South Leitrim in the towns of Carrick-on-Shannon and Mohill. Under the 2005-2008 Traveller Accommodation Programme a Group Scheme of 14 units of Traveller specific accommodation was provided at Shannonside View, Rosebank, Carrick-on-Shannon, Co. Leitrim which provided 8 Group Scheme Dwellings and 6 Service Bays. In recent years, there are only 7 of the 14 units in this development tenanted and there has been a number of incidents of vandalism and significant damage to the vacant units at Shannonside View.

## **5.2 Basis and methodology of Assessment of Need**

In accordance with Section 9 of the Housing Act 1988, as amended, and Section 6 of the Housing (Traveller Accommodation) Act 1998, Leitrim County Council is required, for the purpose of preparing the new Traveller Accommodation Programme, to make an assessment of the accommodation needs of Travellers who have been assessed under Section 20 of the Housing (Miscellaneous Provisions) Act 2009 as being qualified for social housing support. This assessment relates to the existing accommodation needs of Travellers and the projected needs estimated to arise over the period of the new TAP from 2025 to 2029.

The figures from the Annual Traveller Census indicate that Leitrim's Traveller population has increased significantly over the past twenty-four years, from twenty-two households in 2000 to seventy-three households in 2024.

## **5.3 Projected Need**

In accordance with the provisions of the Housing (Traveller Accommodation) Act 1998 and the Minister's direction, an assessment of the projected accommodation needs of Travellers arising during the duration of the new Traveller Accommodation Programme i.e. 1st January 2025 to 31<sup>st</sup> December 2029 was carried out.

Based on the profile of the families currently resident in Leitrim, it is estimated that twelve (12) new family formations may arise over the lifetime of the Traveller Accommodation Programme 2025 - 2029. It is difficult to accurately estimate how many of these new households will remain in Leitrim, however, we estimate that approximately 50% (six new family formations) will remain in Leitrim. Housing is a demand led service and should the level of new family formations exceed this estimate, any change in the need can be addressed in the mid-term review of the Traveller Accommodation Programme which must be completed no later than 30<sup>th</sup> June 2027.

Members of the Traveller community were invited to confirm their accommodation preference as part of the Assessment of Need process. These preferences have been factored into the targets to be achieved in the delivery of the new Programme and will be considered in the context of the availability of suitable

properties, the Council’s Allocation Scheme for Social Housing, the principles of good estate management, availability of resources and any relevant planning requirements.

In Leitrim, the Traveller population is predominantly located in south Leitrim in the county town of Carrick-on-Shannon, which is the area of highest demand for social housing supports within the county. Social Housing applicants now have the option to specifically identify as Irish Travellers by declaration in completing their social housing application form.

**Table 3: Projected Needs under the 2025-2029 Traveller Accommodation Programme**

Category	Number of Households
Households assessed as having a current housing need	14
Estimate of New Household Formations to arise over the lifetime of the 2025 -2029 Programme	6
<b>Total</b>	<b>20</b>

**Transfer Applicant(s).**

Where an individual or a family have applied for a transfer to alternative Local Authority accommodation and have been included on the Transfer List, that specific need has not been incorporated into the Assessment of Need as these households have already had their housing need addressed. Given the current housing crisis and the demand for social housing, there is very limited capacity for the council to be in a position to accommodate transfer requests other than in cases where there is a serious medical issue e.g. the need for ground floor accommodation. Other possible options e.g. the completion of works under the Mobility Aids Grant (MAGS’s) and the Housing Adaptation Grant Scheme (HGD) to render the accommodation suitable to meet the needs of the member of the household with a disability will be considered in the first instance as an alternative to transferring the household to alternative accommodation.

**Table 4: Profile of Households assessed as having a current housing need with their Area of Choice for LA Accommodation.**

Area of Choice	Carrick-on-Shannon	Mohill	Ballinamore
<b>Household Composition</b>			
One adult household	6	1	0
Two adult household	1	0	0
One adult and 2 child dependents	1	0	0
One adult and 3 child dependents	0	0	1
Two adults and 3 dependent children	3	0	0
Two adults and 4 dependent children	1	0	0
<b>Total No. of households</b>	<b>12</b>	<b>1</b>	<b>1</b>
<b>Total Projected Need: 12 + 1 + 1 = 14 Households (12 of which have indicated their preference to be accommodated in Carrick-on-Shannon, 1 in Mohill and 1 in Ballinamore).</b>			

**Table 5: Targets under the 2025-2029 Traveller Accommodation Programme**

	2025	2026	2027	2028	2029	Total
Standard Local Authority Accommodation	1	2	2	2	2	9
Traveller Specific Accommodation	1	1	1	1	0	4
Approved Housing Bodies (AHB's)	0	0	1	1	0	2
RAS/Leasing/H.A.P	1	1	1	1	1	5
Totals	3	4	5	5	3	20

#### **5.4 (B) Group Scheme Development at Shannonside View, Rosebank, Carrick-on-Shannon, Co. Leitrim.**

The 2005-2008 Traveller Accommodation Programme provided for the provision of a Traveller Specific Group Housing Scheme Development at Shannonside View, Carrick-on-Shannon, Co. Leitrim. The development was an Architecturally designed scheme which delivered a total of 14 units of accommodation consisting of 8 dwellings of 2-bedroom, 3 bedroom and 4-bedroom family type accommodation and 6 'Service Bays'. The tenants allocated to Service Bays were provided with a kitchen and utility facilities as well as a bathroom, while retaining their cultural heritage by having a serviced area for a mobile home /caravan to provide their sleeping accommodation.

Following completion of the re-development of the site, Leitrim Integrated Development Company also developed a Childcare Facility on the site to provide childcare, after-school and other supports to members of the Traveller Community. This facility remains a vital aspect of the support's services available to the Traveller Community in Carrick-on-Shannon.

Over the years, the occupancy of this Traveller Specific Group Housing Scheme Development has been impacted by a number of factors including the death of tenants, tenants seeking a transfer to alternative



accommodation and abandonment of units by former tenants. Currently, the occupancy rate of the development is 50% with only 7 of the 14 units tenanted and the remaining 7 units unoccupied.

The underoccupancy of the site has resulted in a marked deterioration in the overall condition of the site. There are ongoing issues with incidents of vandalism, illegal dumping, backyard burning and anti-social behaviour occurring on the site on a regular basis.

In 2023, Leitrim County Council commissioned CENA – the Approved Housing Body for Travellers to complete a report and recommendation on the future of the site. CENA engaged in a detailed consultation process with the residents.

### **Aims of the study**

1. Consult with Shannonside View residents to explore their current accommodation needs, their lived experience of current accommodation arrangements and avenues to meet projected future needs.
2. Gain an understanding of broader challenges and needs faced by residents and implications there may be for mainstream community-based services to address these needs into the future.
3. Consider possible options for development of the Shannonside View site into the future and make recommendations to Leitrim County Council based on this analysis.

Following the consultation process, the report was submitted to the Housing Department with the following options proposed:

1. Refurbishment of existing dwellings.
2. Total vacation of the site and relocation of residents elsewhere.
3. Demolition of existing dwellings and planning for new homes.

The report provided a detailed analysis of the ‘lived in’ experience of the existing residents of the site and referenced the issues that are negatively impacting on the lives of the residents. There is a clear recommendation that any proposed re-development of the site must also consider the need for

additional support services to sustain tenancies and to provide for a range of community development initiatives to sustain any future development of the site.

The report was considered by the Council and the Local Traveller Accommodation Consultative Committee, and it was agreed that the matter warranted further consideration including the information provided from the consultation process completed in preparation for the Draft Traveller Accommodation Programme 2025-2029.

### **Recommendation to progress a solution for the Shannonside View Group Housing Scheme, Carrick-on-Shannon.**

- Having regard to all the factors that must be considered in exploring future proposals for the Shannonside View Group Scheme at Rosebank, the Council proposes to establish an Inter-Agency Working Group with representatives from the key agencies and representatives from the residents currently residing on the site to explore the future options for the site.
- Leitrim County Council will assume the role as the Lead Agency for the Project and will seek membership from the other key agencies and stakeholders.
- The future development of the site or the provision of alternative accommodation will be dependent on adequate funding streams being available to Leitrim County Council.
- The provision of capital funding provided by the Department of Housing, Local Government and Heritage for any social housing schemes will only finance the accommodation costs, additional costs e.g. expansion of community facilities, provision of additional tenancy support services etc would have to be financed by accessing alternative funding streams.
- It is proposed that this Inter-Agency Group will progress the project to reach a final recommendation on the future of the site. The recommendation on the future development of the site/or the de-commissioning of the site together with providing the existing tenants with alternative accommodation will then be progressed with the other actions/outputs for accommodation to be delivered over the lifetime of the Traveller Accommodation Programme 2025-2029.

#### **5.4 Transient Sites**

The incidence of roadside or unauthorised encampments is infrequent in Leitrim with no discernible pattern arising. In the preparation of the new Traveller Accommodation Programme 2025-2029 it is not considered that there is any identified need for the development of a Transient Site within the county. The issue can be reviewed on a regional basis in collaboration with adjoining Local Authorities should the circumstances change over the lifetime of the new Programme.

#### **5.5 Unauthorised Encampments**

Unauthorised encampments present difficulties in relation to health and safety and can be hazardous to road users. Leitrim County Council will consult with relevant parties to address issues arising. The Council will however utilise powers available under the legislation to remove caravans/temporary dwellings when deemed appropriate and necessary.

## **6. Strategy Statement**

### **6.1 Implementing Authority**

Leitrim County Council is the authority responsible for implementing the Traveller Accommodation Programme 2025-2029. The Local Authority co-operates with other public and voluntary agencies as well as adjoining Local Authorities to meet the accommodation needs of Travellers. Several groups have an important role to play in assisting in the implementation of the programme including: -

- The Local Traveller Accommodation Consultative Committee (LTACC)
- The Housing and Corporate Services Strategic Policy Committee (SPC)
- Leitrim Development Company (LDC)
- Health Services Executive (HSE)
- Mayo, Sligo, Leitrim Educational Training Board (MSLETB)
- An Garda Siochana
- Voluntary Housing Bodies (AHBs)
- Department of Social Protection
- Money Advice & Budgeting Service (MABS)

It will be the responsibility of Leitrim County Council to seek the co-operation of the above groups to ensure the implementation of the new Programme. Progress in relation to the 2025-2029 programme will be monitored by the Local Traveller Accommodation Consultative Committee.

In addition, a dedicated Inter-Agency Group will be established with Leitrim County Council to consider the future options for the existing Traveller Specific Accommodation at Shannonside View, Rosebank, Carrick-on-Shannon, Co. Leitrim.

### **6.3 Development of Proposals/Implementation of Programme**

Where a new accommodation project is being provided directly by Leitrim County Council the accommodation proposal will be subject to a local consultation process with Travellers and the Local Traveller Accommodation Consultative Committee, approval by the Department of Housing, Local Government and Heritage and an adherence to the requirements of the Part VIII Planning Procedure. The



Council will avail of the full range of housing options available having regard to expressed accommodation preferences and working within the existing budget for capital funding. The Council will endeavour to provide housing through casual vacancies arising in existing Local Authority housing stock and possibly, subject to sanction, a limited number of acquisitions. The Long-Term Leasing Scheme (SHLI), Rental Accommodation Scheme (RAS) and Housing Assistance Payment (HAP), as well as collaboration with Approved Housing Bodies (AHBs) will also be utilised as a means of addressing the long-term housing needs of the local Traveller community.

### 6.4 Financial Resources

The successful implementation of the Traveller Accommodation Programme 2025 – 2029 will be dependent on the provision of capital funding from the Department of Housing, Local Government and Heritage. The Council is also required to provide funding from the Revenue Budget for housing maintenance and routine maintenance requests on the Social Housing stock.

### 6.5 Management and Maintenance of Accommodation

The effective management and maintenance of accommodation is crucial. Traveller accommodation will be managed on the same basis as all other housing stock. Leitrim County Council will endeavour to ensure maximum tenant participation to manage and maintain accommodation schemes to a high standard.

### 6.6 Measures for Implementation

Leitrim County Council will report regularly on developments and progress on the implementation of the Traveller Accommodation Programme 2025-2029 with reports being made available to the Local Traveller Accommodation Consultative Committee (LTACC), the Housing Strategic Policy Committee (SPC), the Department of Housing, Local Government & Heritage and NOAC – the National Oversight and Advisory Committee who oversee the reporting on the National Performance Indicators for the Local Authority Sector. One of the reports submitted to NOAC is a report on the outputs achieved by the Local Authority in the implementation of their Traveller Accommodation Programme.

## 7. Tenancy Management and Maintenance

Leitrim County Council continues to invest significant financial resources in the management and maintenance of Traveller specific social housing accommodation - this is in line with our management of standard housing schemes.

### 7.1 Repair Requests

All requests for maintenance of Traveller accommodation are recorded. The request is categorised e.g. routine, urgent, emergency, etc. This enables the Housing Maintenance Team to ensure that maintenance works are carried out within a specific timeframe. Works of an emergency nature will continue to be awarded priority status; such works include electrical repairs and maintenance issues of a health & safety nature. There are some maintenance issues which are tenant responsibility. Non-essential repairs and routine maintenance will not be carried out where rent accounts are in arrears of six weeks or more and where is no arrears payment plan in place.

### 7.2 Rent Payments

All tenants are required to pay a rent for the type of accommodation they occupy. Tenants of Shannonside View Group Housing Schem are required to pay a fixed weekly rent while tenants of group housing schemes will be required to pay a rent in accordance with the Council's Differential Rent Scheme. Non-payment of rent may result in repossession proceedings being initiated as is the policy with standard housing. A tenant evicted for non-payment of rent will be deemed to have rendered themselves homeless.

### 7.3 Anti-Social Behaviour

Anti-social behaviour impacts negatively on local residents, the wider community and Leitrim County Council staff. In addition, anti-social behaviour such as, but not limited to, criminal damage, waste dumping etc. places unacceptable burdens on the financial resources of the Council. It is Council policy that anti-social behaviour will not be tolerated in any Council, Traveller specific or standard housing accommodation. Equally, any verbal abuse, threats or intimidation of Council staff will not be tolerated and will be dealt with in consultation with An Garda Síochána.

## 8. Conclusion

- Leitrim County Council acknowledges the commitment, co-operation and support of local Travellers, the Local Traveller Accommodation Consultative Committee (LTACC), Leitrim Integrated Development Company in assisting the Council in the delivery of the previous Traveller Accommodation Programmes.
- The financial support provided by the Department of Housing, Local Government and Heritage has enabled the Council to meet the accommodation needs of the Traveller Community in Leitrim.
- The Council has made considerable progress over the lifetime of the previous Traveller Accommodation Programmes to increase the supply of accommodation to meet the housing needs of the Traveller Community.
  - Of the **73** families currently residing in Leitrim,
    - **39** are accommodated in Standard Local Authority Housing,
    - **12** are accommodated in Traveller Specific Accommodation,
    - **4** are accommodated in housing provided by an Approved Housing Body
    - **7** have been provided with a social housing support under the Long-Term Leasing/ Rental Accommodation Scheme or the Housing Assistance Payment (H.A.P).
- Of the **73** families residing in the county, **62** have had their long-term accommodation needs addressed by the Council. In this regard, 85% of the Traveller Community in Leitrim have had their long-term accommodation needs addressed by the Council.
- The outputs achieved in the delivery of previous Traveller Accommodation Programmes has increased the supply of accommodation to members of the Traveller Community across a range of housing support options.
- The targets set out in this Programme have been developed having regard to the existing and projected need for Traveller accommodation in Leitrim. This Programme is being prepared at a time of unprecedented demand for housing, the Council will continue to deliver on the annual



## Draft Traveller Accommodation Programme 2025 - 2029

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targets for delivery under our Housing Delivery Action Plan 2022-2026 and the outputs to be achieved under the Draft Traveller Accommodation Programme 2025-2029.

- The delivery of this Programme requires a commitment from all stakeholders to work together on a collaborative basis to deliver positive outcomes. It is also dependent on the availability of necessary funding being available from the Department of Housing, Local Government and Heritage.
  - The Council acknowledges the importance of tenancy sustainment supports to enable tenants to sustain their tenancies and/or to access other supports if required that may impact on the tenant(s) ability to successfully manage their tenancies.
  - Leitrim County Council will continue to work closely with Travellers, their representatives, the Local Traveller Accommodation Consultative Committee, and other relevant agencies to identify and access potential funding opportunities to progress initiatives in relation to Traveller Accommodation, Tenancy Sustainment, Support and Integration.
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## Appendix 1 – Local Traveller Accommodation Consultative Committee (LTACC)

### Membership of the Local Traveller Accommodation Consultative Committee May, 2024

<u>Elected Members</u>	<u>Traveller Representatives</u>	<u>Leitrim County Council Staff</u>
Councillor Finola Armstrong-McGuire	Bernadette Reilly	Ann Warnock, Housing Officer
Councillor Gerry Dolan	Christopher Stokes	Sinead Flynn, A/ Senior Executive Officer, Housing
Councillor Paddy Farrell	Ann Stokes	Eamonn Cunningham, Traveller Liaison Officer
Councillor Thomas Mulligan		
Councillor Ita Reynolds-Flynn		
Councillor Enda Stenson (Chairperson)		



## Appendix 2 - Submissions received on the Draft Traveller Accommodation Programme 2025-2029.

1. National Traveller Health Implementation Group.
2. Leitrim Integrated Development Company.
3. Irish Traveller Movement/National Traveller Women's Forum/Pavee Point/Roma Centre.
4. North-West Traveller Health Unit, Health Service Executive.
5. CENA, Culturally Appropriate Homes.
6. National Traveller MABS, Money and Budgeting Advice Service.



Oifig an Phríomhoifigigh  
Cúram Sláinte Pobail Thoir

Bloc B, Láirionad Cathrach, An tSráid  
Mhór, Bré, Co. Chill Mhantáin, A98  
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7<sup>th</sup> February 2024

To: The Traveller Accommodation Unit

From: Aishling Heffernan, Chair of the HSE National Traveller Health Implementation Group

**Submission by the National Traveller Health Implementation Group to the consultation process for Traveller Accommodation Programmes 2025-2029**

**To whom it concerns**

The National Traveller Health Implementation Group (NTHIG) was established to oversee implementation of the National Traveller Health Action Plan 2022-2027 (NTHAP). The plan sets out to address serious inequalities in Traveller health over the five-year period. Travellers have significantly poorer health outcomes than the general population, including higher mortality rates, higher infant mortality rates, lower life expectancy, higher suicide rates and higher rates of chronic disease. Goal 3 of the NTHAP 'to address the social determinants of Traveller health through targeted and mainstreaming measures' includes a series of actions related to the social factors that affect Traveller health. Accommodation is a key social determinant of health and there are a number of accommodation related actions in the NTHAP, which include the HSE working in partnership with the local authority.

We welcome the opportunity to make a submission to the Traveller Accommodation Programme 2025-2029 consultation process. We would also welcome further engagement with our Local Authority colleagues to work in partnership through local and regional structures in relation to addressing the accommodation related social determinants of Traveller health as part of the implementation of the National Traveller Health Action Plan.

Thank you in advance for your consideration of this submission.

Kindest regards

**Aishling Heffernan**

**Chair of the National Traveller Health Implementation Group, Chief Officer Community Health Care East**





### **TRAVELLER HEALTH STATUS**

Travellers experience significant health inequalities as a result of social determinants of health. Mortality rates in the Traveller community are 3.5 times higher than non-Travellers with life expectancy 13.3 years less. The rate of suicide amongst Travellers is 6 times higher than in the general population and accounts for around 11% of all Traveller deaths. Infant mortality rates in the community is 4 times higher than in the general population, with chronic health conditions disproportionately affecting Travellers contributing to the mortality gap. This is seen in higher rates of cardio vascular disease, diabetes and hypertension (12% diagnosed with diabetes and over 10% with undiagnosed diabetes).

### **SOCIAL DETERMINANTS OF HEALTH**

The social determinants of health (SDoH) are the non-medical factors that influence health outcomes. They are the conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life. Accommodation is a key determinant of health. The AITHS found that the better accommodated a Traveller family is the better their health status, stressing the importance of good quality accommodation and amenities in supporting and maintaining good health. The importance of access to good quality accommodation to enable and support positive health including mental health cannot be underestimated. For those living in Traveller specific accommodation, TAPs need to ensure well-maintained sites that are located close to local amenities, with proper sanitation facilities, energy efficient homes, adequate space for families and play facilities for children, as these are essential in supporting and enabling good health outcomes.

### **PARTNERSHIP WORKING**

NTHAP is underpinned by partnership working; this includes HSE Public health, regional Traveller health structures and HSE social inclusion staff working alongside local authorities and government departments, as appropriate, to address the social determinants of Traveller health (Action 36). We welcome the continuation and strengthening of this partnership as part of the Traveller Accommodation Programme. We see an important role for Public Health in supporting and advising the Local Authority in ensuring Traveller accommodation enables and supports good physical and mental health through various means including the provision of Health Impact Assessments for existing and planned Traveller Accommodation in the lifetime of the TAPs.

### **ETHNIC EQUALITY MONITORING**

A key element in ensuring adequate provision of Traveller accommodation is to ensure the robust monitoring processes. These processes can be supported by ensuring implementation of ethnic equality monitoring, including the introduction of a standardised ethnic identifier in line with the national census, across all relevant local authority data sets. This includes datasets for social housing and accommodation, allocations of social housing and accommodation and on homelessness. While we acknowledge that there have been some improvements in relation to data collection, including the addition of a question to capture Travellers in the social Housing Support application form, we recommend this be amended and updated as a universal ethnicity question (as per the census) in line with a human rights based approach.



7. That anti-racism and cultural awareness in-service training are undertaken by LTACC members as Local Authority staff as per Section 42, Irish Human Rights and Equality Act (2014).

Appendix 1- NTHAP relevant actions

35	Consolidate the public health measures put in place to minimise the impact of COVID-19 and other communicable diseases on Travellers, including primary childhood immunisation programmes, control of outbreaks such as hepatitis A, and COVID-19 vaccinations.	HSE Public Health + Local Authorities + other relevant agencies.	NTRIS (Action 79)  Healthy Ireland: A Framework for Improved Health and Wellbeing
36	Public Health Departments and regional Traveller Health Structures to work in partnership with local authorities and Government Departments, as appropriate to address the social determinants of Traveller Health.	HSE Public Health + other relevant agencies.	Healthy Ireland: A Framework for Improved Health and Wellbeing

<sup>1</sup> UCD (2010) All Ireland Traveller Health Study Team. *All Ireland Traveller Health Study: Summary of Findings*. [https://www.ucd.ie/t4cms/AITHS\\_SUMMARY.pdf](https://www.ucd.ie/t4cms/AITHS_SUMMARY.pdf)







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Leitrim Travellers Project  
Shannonside Community Centre  
Shannonside View  
Carrick on Shannon  
Co. Leitrim

6<sup>th</sup> February 2024

Dear Eamonn

We are delighted with this opportunity to make a submission RE: Draft Traveller Accommodation Programme 2025-2029 in addition to Leitrim County Councils assessment of existing and projected housing needs for members of the Traveller Community.

Through our work with the Traveller Community, issues such as mental health, addiction, anti-social behaviour, illegal dumping, illegal fires are brought to us by the residents living at Shannonside View.

The barriers erected in 2019 at Shannonside View with intention of renovating the three lower units became an easy target point for illegal dumping. Fires that happened through criminal damage resulted in abandoned and boarded up premises at Shannonside View and became an attraction for the illegal fires, dumping and substance misuse on a regular basis by non-residents. We acknowledge the efforts made by Leitrim County Council in addressing some of these issues, however the mental health issues brought to us by the residents are a direct result of the conditions they are living in, the anti-social behaviour that takes place and the lack of any improvement in their circumstances.

The National Traveller and Roma Inclusion Strategy 2017-2021 cites 'The National Traveller Accommodation Consultative Committee and the Local Traveller Accommodation Consultative Committees will examine how best they can further develop the involvement of Traveller-specific accommodation tenants in issues relating to their scheme or site.' It is noted that this will be part of the process in establishing the new TAP 2025-2029 by Leitrim County Council.

Leitrim Integrated Development Company CLG Reg. Office: Drumshanbo, Co Leitrim. Co. No: 451100 GHY. No: 20070700

Chair: Philip Rooney, Mary McKiernan, Teresa O'Callaghan, Damian Brennan, Martin Dolan, Seamus O'Donnell, Shane Kieran, Kevin Comiskey, Michele Gannon, Patricia Clarkson, Mary Taylor, Mary Hoohan, Ciaran Sheridan, Con Dolan, Frank Cadam, Jan Mella, Brigid McGourty, Jeanette Dolan

The European Agricultural  
Fund for Rural  
Development: Europe  
Investing in Rural Areas



Cóirbhíocht ag an  
Aontas Eorpach  
Co-fundáil by the  
European Union



Riail  
Institiúnta  
Government  
of Ireland

Stioscacht Éireann  
Project Ireland  
2040

Ar d'Íochsail  
Tuaithe  
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Leitrim Development Company having been working with and for the Traveller Community in Leitrim for over twenty years and in our experience when assessing Traveller needs it is imperative to incorporate their culture, traditions and way of life. The Joint Committee on Key Issues affecting the Traveller Community 2021 stated:

'The Committee heard that when accessing accommodation, Traveller face additional barriers due to specific cultural considerations, such as the average Traveller family unit being larger than that of the settled community, and the cultural significance of horse ownership. The Irish Human Rights and Equality Commission told the Committee that their equality reviews on Traveller accommodation show scant evidence of a full appreciation of the practical implications of cultural difference when providing services and engaging with the Traveller community. Aspects of Traveller culture, such as ethnicity, nomadism, use of caravans and horsemanship, are not adequately provided for in Traveller Accommodation. Another key area highlighted is the lack of amenity or play facilities on Traveller-specific accommodation sites.'

We are in full support of the preferred option in the CENA *Feasibility Study on Possible Future Development Options for the Site at Shannonside View, Carrick on Shannon, Co. Leitrim* report June 2023 for demolition of existing dwelling and planning for new homes. CENA's plan outlines working with the Traveller Community from a Socially Just Community Development approach, they acknowledge the issues that individual residents are facing and incorporate solutions into their culturally appropriate plan. In our opinion CENA have the experience and expertise when working with the Traveller Community, over a short space of time they managed to build trusting respectful relationships with the residents of Shannonside View and have a greater understanding of Traveller needs.

In conclusion we support the demolition of the existing dwelling at Shannonside View and the planning for culturally appropriate homes.

Yours Sincerely

Barbara Sweeney

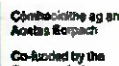
*Traveller Project Co Ordinator*

Nicola Burke

*Traveller Development Worker*

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**Submission to the Development of the Traveller Accommodation Programme 2025 - 2029**

**by Irish Traveller Movement, National Traveller Women's Forum and Pavee Point Traveller and Roma Centre**

**February 2024**

**Our Coalition:** This report is submitted as a coalition of three national organisations which work towards achieving Traveller and Roma rights in Ireland.

**The Irish Traveller Movement** represent Traveller interests in national governmental, international and human rights settings, and challenge racism - individual, cultural and structural which Travellers face and promote human rights and equality.

**Pavee Point Traveller and Roma Centre** is a national non-governmental organisation working towards the attainment of human rights for Irish Travellers and Roma in Ireland and internationally since 1985.

**The National Traveller Women's Forum** is a network of Traveller women and Traveller organisations throughout Ireland that recognises the particular oppression of Traveller women in Irish society.



## **Traveller ethnicity**

Travellers are an indigenous ethnic minority who, historical sources confirm, have been part of Irish society for centuries.

On the 1st of March 2017 Taoiseach Enda Kenny announced formal acknowledgment of Travellers as a minority ethnic group within the State.

### **Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029**

The provisions of the *Housing (Traveller Accommodation) Act 1998 Act* provide for public input and consultation at all stages of the preparation and implementation of Traveller Accommodation Programmes. The following recommendations have been informed by current legislation, reviews of previous TAPs, and the insight and lived experience of our members.

- 1. Adherence to Guidelines:** DHLGH (2023) Guidelines For The Preparation, Adoption And Implementation Of Local Authority Traveller Accommodation Programmes 2025-2029 be fully endorsed by Each Local Authority
- 2. Community Consultation:** It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018 stated, local authorities should collaborate closely with representative bodies of the Traveller community. By involving the Traveller community and their representatives, first hand lived experiences and insights will greatly contribute to the success of the programme.
- 3. Determining Need:** Traveller Accommodation Programme must relate to both the existing accommodation needs *and* the projected need that will arise during the period of the programmes, across a range of accommodation options including standard and group housing, permanent residential sites for caravan/trailer, and transient sites. There must be clear and measurable targets.
- 4. Inclusion in Development Plans:** County, City and Local Area Development Plans must include objectives for the provision of accommodation for Travellers and the use of particular areas for that purpose.
- 5. Alignment with Housing Strategies:** Traveller accommodation should be planned in an intersectional way, informed by Housing for All, The National Housing Strategy(s) for Disabled People 2019 – 2027, The Action Plan on 'Housing Options for our Ageing Population', Housing First (Homeless Strategy) and the National Youth Homeless Strategy.

**6. Adoption of Equality Reviews:** The Irish Human Rights and Equality Commission report of Equality Reviews recommended the implementation of these should form the next TAPs.

**7. Acceleration of Accommodation:** We call for prioritisation of provision to Traveller families in shared and overcrowded accommodation & for overcrowding to be phased out as a matter of urgency.

**8. Budgets:** Each local Authority should provide costing for the full implementation of the Traveller Accommodation programme 2025-2029, including Maintenance, Capital Projects and any other allocations to support TAPs.

**9. Alignment with Health Determinations:** We endorse recommendations of The Traveller Health Unit to the Eastern Region to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2025-2029. 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.

**10. Map Traveller Accommodation in the TAP:**

- Each TAP should reflect the OPR's recommendation as referred in the DHLGH Circular 28/2022 Case Study Paper '*Traveller Accommodation and the Local Authority Development Plan*, that local authorities improve linkages between the Traveller Accommodation Programmes, whether existing or amended, and their Development Plans.
- Map sites in the TAP for the purpose of transient provision.

**11. Public Sector Duty:** The TAP should state the Council's statutory obligation under the Public Sector Duty to eliminate discrimination and promote equality. The cultural needs of Travellers should be considered and assessed during the course of the consultation process.

**12. The indigenous requirement** should be reviewed to ensure there is no discrimination when compared to the requirements of the wider community in accessing social housing, i.e. it should be discretionary, rather than conclusive, to prevent potentially unlawful discrimination against Travellers.

**13. An Environmental Health Framework:** Environmental and Climate Change considerations should be factored into the planning of Traveller Accommodation and include prioritised energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

**14. Play facilities** should be provided in Traveller specific accommodation in line with Action 61 in NTRIS<sup>1</sup>.

15. **A Human rights-based Approach to Traveller Accommodation to be implemented, including Anti-Racism Training for local authority staff and public representatives.**

16. **A General Ethnic Identifier should be used within the social housing application, as is best practice within a human rights framework, rather than a Traveller only question, and data should be collected specifically in each council for Travellers experiencing homelessness and reported via PASS.**

17. **LTACC:** There is a need for each LTACC to have an independent chair. Each LTACC should produce an annual report, and have TAP as a standing item, including progress reports.

18. **Midterm review** of the Traveller Accommodation Programme should take into consideration the development of the future TAP Programme 2030-2034, with an awareness and understanding of future and projected need.

#### **Traveller Accommodation Legal and Policy Obligations**

Government commitment to Traveller accommodation is manifested under legal and policy instruments including The Housing (Traveller Accommodation) Act, 1998. The Act mandated Local Authorities

a) to deliver culturally appropriate accommodation in all its forms, including: halting sites, group housing schemes, standard houses and transient accommodation in the Republic of Ireland to Travellers.

b) establishment of Local Traveller Accommodation Consultative Committees, LTACCs, in each Local Authority area to advise on the provision and management of accommodation for Travellers.

*The Planning and Development Act 2000<sup>2</sup>*, as amended, also requires that the land use aspects of TAPs should be reflected in the local authority's development plan. Under Section 10(2)(i) of the 2000 Act the development plan must include objectives for "the provision of accommodation for Travellers, and the use of particular areas for that purpose."

*Development Plan Guidelines 2007<sup>3</sup>*, was issued by the Minister under Section 28 of the 2000 Act, stipulating the approach of the development plan in addressing the accommodation needs of the Traveller community.

*The Housing Need and Demand Assessment (HNDA)*, which emanates from the National Planning Framework (NPF), requires specifically, to address specialist needs categories including Traveller accommodation.



*The Programme for Government 2020*<sup>4</sup>, focused on ensuring that the accommodation needs of the Traveller community are met by local authorities and that capital funding programmes for such accommodation are drawn down and utilised.

*Housing for All 2021*<sup>5</sup>, has a remit to increase and improve the output of Traveller-specific accommodation, and a commitment by the Government to work with Local Authorities and AHBs.

*Land Development Agency Act 2021*<sup>6</sup> under section Services to local authorities, 15 (1) (a) 'A local authority may request the Agency; to provide services to it in relation large scale, multi tenure or mixed-use development sites that may include sites that are fully or partially intended to secure the implementation of all or part of an accommodation programme, within the meaning of the Housing (Traveller Accommodation) Act 1998.

*The National Youth Homelessness Strategy*<sup>7</sup>, obligates councils to

- a) Include specific actions in future Traveller Accommodation Programmes (TAPs), to address youth homelessness'.
- b) Work with the LTACCs to consider and put in place any additional supports that are required at a local level to assist young Travellers who are at risk of experiencing homelessness'.

*Moratorium Part 8*<sup>8</sup> of the planning process The temporary time-limited moratorium on Part 8 of the planning process, January (2023) had a potential benefit for councils in the acceleration of Traveller specific projects.

#### **Policy Reforms and Reviews since the TAP 2019-2024**

*The Traveller Accommodation Expert Review 2019*<sup>9</sup>. The report sets out an integrated set of recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. These recommendations address four key themes: delivery reflecting need, planning, capacity and resources, and governance.

*The Irish Human Rights and Equality Commission Equality Review (2019)*<sup>10</sup> The Commission invited 31 local authorities to undertake a review of their provision of Traveller accommodation and to conduct a review of the practices, procedures and other relevant factors in relation to the drawdown of capital funding and the provision of Traveller-specific accommodation services.

*The Office of the Planning Regulator conducted a Case Study Paper entitled Traveller Accommodation and the Local Authority Development Plan 2021<sup>11</sup>, and surveyed existing local authority development plans (1) and Traveller Accommodation Programmes (2) (TAP) to examine links between their policies and objectives relating to Traveller-specific accommodation. The purpose was to address knowledge gaps, to provide support for local authorities in performing their duties and to highlight best practice to foster shared learning.*

### **Current Need**

During the course of the current TAP 2019 – 2024, Ireland's housing crisis has grown to unprecedented levels. The demand on housing and social housing stock has accelerated, in November 2023, over 13,500 people were in emergency accommodation, including 4000 children.<sup>12</sup>

These figures would undoubtedly increase if they were to be based on the ETHOS definition of homelessness, which includes overcrowding and couch surfing. In December 2023, only 3% of rental accommodation was available through HAP<sup>13</sup>. The housing crisis has a disproportionate impact on Travellers, who already face discrimination when accessing private rental accommodation. Over 8,000 Travellers are in need of accommodation, including 2000 families in overcrowded or emergency provision, or roadsides. Additionally, 13% of all homeless adults nationally were Travellers<sup>14</sup>. As a comparator to national homeless findings (children and adults), this could equate to 1 in 5 Travellers as homeless, as a low estimate.

### *Social Housing Delivery Trends.*

Delivery Rate Comparisons: 10,263 social homes were delivered in Ireland under Housing for All for in 2022 7,433 of these were new-build, 5,196 in 2021 and 5,073 in 2020. No Traveller specific builds were delivered under the Plan.

Comparing further for the 3-year period 2019-2022 of all local authority New builds with the rate of local authority Traveller new builds, nationally 5,771 units were built in 2019, in 2020 2,230 units and in 2021 1,998 units, a total of 9,999. For the same 3-year period only 44 units of Traveller accommodation were built by local authorities.<sup>15</sup>

### *Need for Traveller for Traveller Homelessness Task Forces.*

National Homeless Action Committee (NHAC). There is no national audit or assessment of the need for Traveller homelessness. Homeless services and agencies do not collect Traveller data. Local authorities are responsible for the adoption of Homelessness Action Plans that address the challenges for all homeless people including Travellers, but an audit<sup>16</sup> of local authority Traveller Accommodation Programmes (2014-2019) showed only some local collect data for those in Emergency or homeless accommodation, and 12 of the 31 did not record data with most deferring duty to homeless services. There is a specific urgent need for action focussed local Traveller Homelessness Task Forces, and a central

Traveller Strategy with specific intersectional priorities based on disability, children, at risk of homelessness, single parenting and domestic violence.

### **Demographic trends since the last TAP**

Population Data – The recent Census provides some suggestive baseline of community demographic patterns, however, is not a total count or assessment nationally. The rate of completion of the ethnic question by Travellers was enumerated in 2022 as 32,949 people<sup>17</sup>. The more accurate account is found in figures compiled by the Department of Housing / Local Authority annual estimates (November 2022) accounting for approx. 48,732 people working off a household size of 4.

The current Traveller family count nationally shows (2022)<sup>18</sup> shows an increase of 381 families from the previous year. Further increases are found in the rate of overcrowding with an additional 79 Families Sharing (828 to 907) and (167 more families living on Unauthorised Sites (487 to 654). In total, culminating in a rate of need to approx. 3,500 people.

County trends indicate growth rates as follows: A population growth rate of 6% nationally, with the largest growth in Offaly (up 30%), Fingal (up 17%), Tipperary (up 17%), and Cork (up 11%). However, the number of Travellers enumerated in some counties fell between 2016 and 2022, including Longford (down 13%) and South Dublin (down 12%).<sup>19</sup>

### **Consultation**

It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018<sup>20</sup> stated "It is essential that Traveller Accommodation Programmes are prepared in a consultative manner. The Act requires that housing authorities consult with adjoining housing authorities, the HSE, approved housing bodies, the Local Traveller Consultative Committee, other local Traveller representative groups, community and interest groups and the public in general. The purpose of broad consultation ensures that the interests of all concerned with or affected by proposals for Traveller accommodation are considered and to facilitate a planned and comprehensive response by housing authorities to the accommodation needs of Travellers'.

### **Consultation Process**

We strongly recommend compliance of the National Traveller Accommodation Consultative Committee (NTACC) guidelines regarding Traveller consultation at local level and on LTACCs, in the preparation and implementation of TAPs and propose a timeframe to allow for consultation with community and their representative groups, within plans. Please see



Appendix A for Operation and membership of Local Traveller Accommodation Consultative Committee's (LTACCs) based on NTACC's Guidelines.

Under Section 42 (Appendix B) of the *Irish Human Rights and Equality Act 2014*<sup>21</sup> all public bodies in Ireland, including Local Authorities, have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, the Public-Sector Equality and Human Rights Duty.

### **Statement of Strategy**

The 6th TAP should be bound by SMART principles, Specific, Measurable, Achievable, Relevant and Time bound. This should be stated within the strategy statement and be reflected within the TAP. This can be achieved through setting targets and timeframes for both the delivery of accommodation and for Traveller accommodation service improvements.

### **Assessment of Needs**

We recommend that local Traveller organisations should be involved in carrying out the assessment of need. In the case where local Traveller organisations have developed their own assessments, the local authority needs to take these into consideration when compiling figures. The assessment of need must include for: Halting sites, Accommodation for Nomadic families- transient halting sites are relevant to the "annual patterns of movement of Travellers", so it must take account of nomadic families. The assessment must also take account of present and future needs during the lifetime of the programme.

### **Traveller Accommodation Expert Review July 2019<sup>22</sup>**

This report set out an integrated set of 32 recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. The following recommendations are particularly relevant to the development of Traveller Accommodation Programmes.

#### ***Expert Review Recommendation A.8:***

"Commission research on homelessness among Travellers and ensure that the particular accommodation challenges and preferences of this group are addressed in relevant strategies to combat homelessness."



To align with this policy objective, Local Authorities should submit the current number of Travellers in emergency accommodation and number registered as homeless.

*Expert Review Recommendations (A.3a and 3b),*

Information on Travellers currently accommodated in RAS, HAP and Rent Supplement funded dwellings. This would require the inclusion of an ethnic identifier in applications for these housing allowances and the collation of data currently recorded by the Department of Employment and Social Protection (in the case of Rent Supplement) and on each local authority's 'transfer list' (in the case of RAS and HAP).

b. An in-depth nationwide survey of the characteristics of the Traveller population, their location and accommodation, commissioned from an independent, expert provider. This survey would provide more detailed information on Travellers' mobility patterns, family formation, existing accommodation tenure and conditions, and future accommodation preferences. It could also be used to inform the ongoing review of the accuracy of the Social Housing Assessments, as recommended above.

#### **Traveller Specific Accommodation**

The Office of the Planning Regulator <sup>23</sup> identified as best practice, the need for Local Authorities, in planning for Traveller accommodation to:

- Provide recognition of the cultural requirements of members of Travellers in regard to accommodation.
- Prioritise community integration, access to services and supporting cultural infrastructure associated with Traveller culture.

In relation to Traveller-specific accommodation (group housing schemes, halting sites and transient sites) developments planned the following should be identified:

- Timeline
- Number of units
- Site for development should be identified and mapped.
- Indicative budget requirements

#### **Development of Transient Sites**

The DHLGH Guidelines and Circular 35/2018 underpin the recommendation of reviewing evidence of the assessment basis and survey methodology used to determine the need for a transient site, and future proofing specific delivery targets for transient provision, which can be identified and mapped in both the TAP and the Development Plan. This is a statutory

obligation of the Traveller Accommodation Act 1998 Transient Accommodation should be provided simultaneously with the other types of accommodation.

### **Tenant Participation**

The degree to which Travellers are involved in the development of accommodation options 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 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 complaints to a plan of action based on need and develops an understanding of Traveller issues and builds new relationships between all involved.

### **Caravan Loan Scheme**

We welcome the roll out of the Caravan Loan Scheme due for 2024 and recognise the hard work done to date. The Department confirm a review of the scheme will be conducted in 2024 and gives some reassurance to national and local Traveller organisations who continue to raise concerns about pace needed to meet the demand.

### **Fire Safety in Traveller Accommodation**

The National Directorate for Fire and Emergency Management was mandated to lead and oversee at the national level a programme to review fire safety in local authority provided Traveller accommodation, following the tragic loss of life on 10th October, 2015 of ten members of an extended Traveller family living in local authority provided Traveller accommodation in Carrickmines, Dublin. Under direction from the NDFEM, local authorities undertook a major exercise aimed at enhancing fire safety in Traveller accommodation in 2015/16.

An update to the NTACC on Local Authorities Fire Safety Measures for the period 1st September 2016 – 31st August 2019 was published in May 2022. There have been no subsequent reports by local authorities. Fire safety must be prioritised by local authorities, with regular reports on safety measures published and updated fire safety training provided. Fire safety should be part of the ongoing work of The Local Traveller Accommodation consultative Committee (LTACC).

## Proposed Checklist for development of Traveller Accommodation Programmes 2025 - 2029

<p><b>Consultation</b></p>	<ul style="list-style-type: none"> <li>• Was there engagement with the LTACC, local Traveller organisations and stakeholders at all stages of the development of Traveller Accommodation programme?</li> <li>• Did the LTACC sign off on the original TAP?</li> </ul>
<p><b>Current Need</b></p>	<ul style="list-style-type: none"> <li>• What is the total of units / families in need?</li> <li>• What methodology was used to assess need and is this independently verifiable</li> <li>• Has current need been determined by accommodation type; differentiated across, Traveller specific accommodation, group housing schemes, transient sites, halting sites, HAP/RAS, standard social housing, Approved Housing Bodies, single instance/one off rural housing.</li> <li>• What methodology was used to assess Traveller need for accommodation preferences?</li> <li>• with a narrative on reasons for delay or amendments.. (not sure what that is)</li> <li>• Has need increased or changed since the TAP was drawn up and targets now in need of revision?</li> </ul>
<p><b>Future and Projected Need</b></p>	<ul style="list-style-type: none"> <li>• What is the total number of units / families in future need by accommodation type per year and delivery planned across each type per year?</li> <li>• Is increased growth reflected, where need has outgrown the original assessment and are indicators of measurement detailed to support figures?</li> </ul>
<p><b>Recognition of Culture</b></p>	<ul style="list-style-type: none"> <li>• Does the TAP identify the Council's statutory obligation under the Public Sector Duty to eliminate discrimination and promote equality?</li> <li>• Have the cultural needs of Travellers been considered and assessed?</li> <li>• Indigenous Requirement and Local Connection Rule</li> <li>• If the TAP references an indigenous requirement, has this been reviewed to ensure there is no discrimination when compared to the requirements of the wider</li> </ul>

	community in accessing social housing, i.e. where it should be discretionary, rather than conclusive, to prevent potentially unlawful discrimination against Travellers
<b>Homelessness</b>	<ul style="list-style-type: none"> <li>• Are figures provided on numbers of Travellers / families in homeless accommodation?</li> </ul>
<b>Budget and Planning</b>	<ul style="list-style-type: none"> <li>• Are timelines, site locations, target units and budgets identified for Traveller specific accommodation projects and have progress updates on each been provided?</li> <li>• Have these been mapped (or now amended to be) in line with the recommendations of the OPR report, in both the TAP and the Development Plan?</li> <li>• Have transient sites been assessed and planned for?</li> </ul>

## Appendices

### Appendix A

#### **Summary of Requirements for the Traveller Accommodation Programmes Provided in the DHLGH Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025-2029<sup>24</sup>**

- The Minister has, under section 6(1) of the 1998 Act, directed that relevant housing authorities for the purposes of preparing a Traveller Accommodation Programme in the functional area concerned, make an assessment of the accommodation needs of Travellers who are assessed under S.20 of the Housing (Miscellaneous Provisions) Act 2009 as being qualified for social housing support, including the need for sites.
- The Minister has given a direction under section 6(5) of the 1998 Act, specifying that relevant housing authorities shall make an estimate of the projected accommodation needs of Traveller families arising during the duration of the programme (1 January 2025 to 31 December 2029).
- Under section 10(2)(b) of the Act the Minister has directed that the information in relation to the needs to be met by the programmes shall be in summary form but in sufficient detail to show the needs for all categories of Traveller accommodation and the general area in which the accommodation is required.



- The Minister has directed under section 10(2) of the 1998 Act that annual targets be included in the programmes in respect of the implementation of the programmes. The targets should include details of the numbers of units of accommodation proposed to be delivered for each of the five years of the programme for Traveller specific accommodation (group housing, bays on halting sites, including transient sites) both new and refurbished and for standard housing.
- Under section 7(4) of the Act the Minister has specified 31 December, as the latest date by which accommodation programmes must be adopted.
- The Minister has, under section 10(1) of the 1998 Act, directed that the next accommodation programme should be for a period of 5 years and that the programme shall begin on the 1st of January 2025.
- The Minister has, under section 17(1) of the 1998 Act, directed that a review of the next accommodation programme should be carried out no later than 30th June 2027.

## **Appendix B**

### **Operation and membership of Local Traveller Accommodation Consultative Committee's (LTACCs)**

The following recommendations are based on the NTACC's Guidelines.

1. LTACCs are to advise the appointing authority in relation to: The provision and management of accommodation for Travellers.
2. Nomination procedures need to be inclusive and transparent and Traveller representatives appointed should be positioned to represent the overall Traveller population in each area. In areas where local Traveller accommodation organisations exist, these groups should nominate their own representatives, where local groups do not exist, national Traveller organisations should be a point of reference to local authorities.
3. The preparation and implementation of any accommodation programme for the functional area of the appointing local authority. The issue of management of Traveller accommodation and discussion of individual accommodation cases, should not feature within the scope of the work of LTACCs.
4. Operation practice: LTACCs should meet a minimum of 4 times a year, as laid out. In accordance with the Housing Traveller Accommodation Act 1998 and NTACC guidelines. The Director of Services should report in person to every meeting of the LTACC.
5. The overall objective of the LTACCs is to ensure Traveller Accommodation Programmes are implemented in full. In order for this to happen LTACCs should embed annual monitoring indicators offset against TAP annual targets and its own work plan. Process, as well as delivery, should be monitored by the LTACC.
6. The LTACC should produce an Annual Report including a summary of activities in the period. Copies of this Report should be given to the appointing Local Authority as well as a copy sent to the National Traveller Accommodation Consultative Committee.

7. The LTACC should formally report to the appointing Local Authority Manager & Director of Services twice a year. The Manager and Director of Services should formally be asked to meet with the LTACC once a year, on completion of the LTACCs Annual Report.
8. LTACCs are crucial to the success of TAPs. In cases where LTACCs are not functioning the national accommodation officer of the ITM are available to assist.
9. Ensure 'Memorandums of understanding' to inform the work practices of LTACC's and ensure an effective and pragmatic approach to working in partnership with positive duty obligations as per Section 42 of the IHREC Act (2014) for members of the LTACC.

## **Appendix C**

### **Irish Human Rights and Equality Commission Act 2014, S.42**

#### **Public bodies**

42. (1) A public body shall, in the performance of its functions, have regard to the need to—
- (a) eliminate discrimination,
  - (b) promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
  - (c) protect the human rights of its members, staff and the persons to whom it provides services.
- (2) For the purposes of giving effect to subsection (1), a public body shall, having regard to the functions and purpose of the body and to its size and the resources available to it—
- (a) set out in a manner that is accessible to the public in its strategic plan (howsoever described) an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body and the policies, plans and actions in place or proposed to be put in place to address those issues, and
  - (b) report in a manner that is accessible to the public on developments and achievements in that regard in its annual report (howsoever described).
- (3) In assisting public bodies to perform their functions in a manner consistent with subsection (1), the Commission may give guidance to and encourage public bodies in developing policies of, and exercising, good practice and operational standards in relation to, human rights and equality.
- (4) Without prejudice to the generality of subsection (3), the Commission may—
- (a) issue guidelines, or
  - (b) prepare codes of practice in accordance with section 31,
- in respect of the development by public bodies of performance measures, operational standards and written preventative strategies for the purpose of reducing discrimination and promoting human rights and equality in the public sector workplace and in the provision of services to the public.
- (5) Where the Commission considers that there is evidence of a failure by a public body to perform its functions in a manner consistent with subsection (1) and that it is appropriate in all the circumstances to do so, the Commission may invite the public

body to—

(a) carry out a review in relation to the performance by that body of its functions having regard to subsection (1), or

(b) prepare and implement an action plan in relation to the performance by that body of its functions having regard to subsection (1),

or both.

(6) A review or an action plan under subsection (5) may relate to—

(a) equality of opportunity or human rights generally, or

(b) a particular aspect of human rights or discrimination, in the public body concerned.

(7) The Commission may, and, if requested by the Minister, shall, review the operation of subsection (1).

(8) For the purposes of assisting it in carrying out a review under subsection (7), the Commission shall consult such persons or bodies as it considers appropriate.

(9) Where the Commission carries out a review under subsection (7) it—

(a) may, or

(b) where the Minister has requested the review, shall, make a report of the review to the Minister and any such report shall include such recommendations as the Commission thinks appropriate.

(10) The Commission shall cause a copy of the report to be laid before each House of the Oireachtas.

(11) Nothing in this section shall of itself operate to confer a cause of action on any person against a public body in respect of the performance by it of its functions under subsection

## References

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<sup>2</sup>Government of Ireland, The Planning and Development Act 2000, Dublin: Dublin Stationery Office <https://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/html>

<sup>3</sup><https://www.google.com/url?q=https://www.gov.ie/en/publication/225d8-development-plan-guidelines/&sa=D&source=docs&ust=1707408247122472&usg=AOvVaw239y7uBQNF2EVARxdgXTFj>

<sup>4</sup> <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

<sup>5</sup> <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

<sup>6</sup> <https://www.irishstatutebook.ie/eli/2021/act/26/enacted/en/html>

<sup>7</sup> <https://www.gov.ie/en/publication/69597-youth-homelessness-strategy/>

<sup>8</sup> <https://www.gov.ie/en/press-release/6ab3a-government-counter-motion-on-the-private-members-business-motion-re-eviction-ban/>

<sup>9</sup> <https://www.housingagency.ie/publications/traveller-accommodation-expert-review-2019>



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- <sup>11</sup><https://www.opr.ie/wp-content/uploads/2021/10/Traveller-Accommodation-and-the-Local-Authority-Development-Plan-Case-Study.pdf>
- <sup>12</sup><https://www.irishtimes.com/ireland/social-affairs/2024/01/05/number-of-people-in-emergency-accommodation-hits-new-high-of-13514/>
- <sup>13</sup><https://www.simon.ie/e-publication/locked-out-executive-summary-december-2023/>
- <sup>14</sup> [https://fra.europa.eu/en/publication/2020/roma-travellers-survey\(2020\)](https://fra.europa.eu/en/publication/2020/roma-travellers-survey(2020))
- <sup>15</sup><https://www.gov.ie/en/collection/6060e-overall-social-housing-provision/#local-authority-build>
- <sup>16</sup><https://itmtrav.ie/wp-content/uploads/2021/08/PDF-ITM-Traveller-Accommodation-Programme-Analysis.pdf>
- <sup>17</sup><https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>
- <sup>18</sup><https://www.gov.ie/pdf/?file=https://assets.gov.ie/276539/9248d855-1f03-42c3-be31-def188fdf7a8.pdf#page=null>
- <sup>19</sup><https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>
- <sup>20</sup><https://www.wicklow.ie/Portals/0/Documents/Housing/Traveller-Accommodation/Circular%20Housing%20%2035.2018%20%20%20%205th%20Traveller%20Accommodation%20Programme%202019%20-%202024.pdf>
- <sup>21</sup> Government of Ireland, Irish Human Rights and Equality Commission Act 2014, S.42, Dublin: Dublin Stationery Office.
- <sup>22</sup><https://www.paveepoint.ie/wp-content/uploads/2019/07/Expert-Review-Group-Traveller-Accommodation.pdf>
- <sup>23</sup><https://www.opr.ie/wp-content/uploads/2021/10/Traveller-Accommodation-and-the-Local-Authority-Development-Plan-Case-Study.pdf>
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**CÚRAM SLÁINTE POBAIL  
COMMUNITY HEALTHCARE**

CABHÁN DÚN NA NGALL LIATROIM MUINEACHÁN SLIGEACH  
CAVAN DONEGAL LEITRIM MONAGHAN SLIGO

Chulmsú Sóisialta  
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8<sup>th</sup> February 2024

Dear Chief Officer,

Please find for your consideration the submission from the Traveller Health Unit (THU) in the Eastern Region to the Traveller Accommodation Programme 2025-2029

In this submission, we have highlighted five key areas which affect Travellers' health and are existing policy commitments which we believe needs to be taken account of in the development of the Traveller Accommodation Programme (TAPs)2024-2029. Namely:

1. Delivery and accountability of TAPs
2. Impact of accommodation policy as a driver of the social determinants on health
3. Impact of dispersal & private rented accommodation policy
4. Public health and environmental concerns
5. Safety of Traveller Children

We believe it is imperative that the health impacts, including public health concerns, of the living environment are seriously addressed in the development of the new TAPs.

Yours sincerely

Patricia Garland  
Social Inclusion Manager CH CDLMS





**Submission to Local Authorities Traveller Accommodation Plans (January 2024)**





## North West Traveller Health Unit

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The NW Traveller Health Unit (THU) covers the Community Healthcare region Cavan Donegal Leitrim Monaghan and Sligo (CH CDLMS). The Traveller Health Unit (THU) work plan is implemented through regional THU initiatives; The Hse funds Six Traveller health projects, including five Primary Health Care for Travellers Projects (PHCPs) and a local health initiative in Sligo for mental health support, Donegal Older Person service and Monaghan Primary Health Care development project. The PHCPs employ Traveller Community Health Workers who undertake health advocacy in a range of health arenas, e.g., mental health, health education; child and infant health; immunisations and health alerts; addiction; diet and exercise; health and well-being; women's health; men's health; and social determinants work including accommodation and environmental health issues. The key objective of the NW THU is to enhance Traveller health status, improve the capacity of mainstream health services to respond to Traveller needs and respond to the social determinants that are at the root of Traveller health inequalities. This work is underpinned by a partnership approach, which is crucial in supporting collective and coordinated responses to addressing Traveller health inequalities.

## Introduction

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The NW Traveller Health Unit welcomes the opportunity to make this submission to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2024-2029. We acknowledge some progress 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 positive relations between HSE staff and the local authorities in this THU region in working collaboratively in Traveller inter-agency work over many years. This was particularly evident during COVID-19 whereby HSE (including HSE Public Health), local authorities and the THU worked positively together to try to mitigate the worst of the impact of the virus among Travellers. It is imperative that this positive engagement continues going forward given the importance of accommodation in relation to the social determinants of health.

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 North West covers Sligo, Leitrim and Donegal and with the establishment of the Community Health Organisations in 2015 Cavan and Monaghan joined the NW THU. The aim of the Traveller Health Units is to priorities' 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 five key areas, which affect Travellers health, which are existing policy commitments which we believe need to be taken account of in the development of the Traveller Accommodation Programme 2025-2029. Namely:

1. Delivery and accountability of TAPs
2. Impact of accommodation policy as a driver of the social determinants on health
3. Impact of dispersal policy and slow pace in development of Traveller specific accommodation
4. Public health and environmental concerns
5. Safety of Traveller Children

#### **Recommendations for Traveller Accommodation Programmes**

##### **1. Support delivery of robust TAPs through accountability**

- Build on relationships established during COVID between Local Authorities and HSE Public Health to support and enable the provision of Traveller accommodation that supports and maintains positive physical and mental health for Travellers.
- Ensure representation from Travellers on LTACC, nominated through Traveller organisations where Traveller organisations do not exist, NTACC to support nominations. Set a minimum number of representatives to ensure meaningful representation.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop and publish annual progress TAP reports to monitor progress; reports to be submitted to the Department of Housing Local Government and Heritage.
- Local Authorities to make available training in anti-Traveller racism and Traveller Cultural Awareness for LTACC members.

##### **2. Address the Social Determinants of Health**

- Culturally appropriate Traveller-specific accommodation should be developed and the needs of nomadic Travellers catered for *through provision of transient sites as recommended in the Housing (Traveller Accommodation) Act 1998*.
- Traveller organisations should be directly involved in the accommodation needs assessments to capture the existing needs and projected needs as per TAP guidelines. This should be inclusive of Traveller families who are homeless and living on unauthorized sites.
- 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 receive in-service anti-racism and discrimination training in order to comply with positive duty obligations and fulfil commitments as per the National Plan Against Racism.



**3. Recognition of the impact of dispersal & private rented accommodation policy in Traveller homelessness**

- Traveller-specific accommodation should be provided for in the TAP
- Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation
- A universal ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS

**4. Ensure a holistic approach to Traveller accommodation needs, including public health and environmental concerns**

- 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.
- Learning and mechanisms used to support the provision Traveller accommodation provision throughout COVID-19 should be utilised and mainstreamed into TAP processes
- We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.
- Environmental and Climate Change considerations to be factored into the planning of Traveller Accommodation.
- Traveller Accommodation should be prioritised for energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

**5. Future-proofing and ensuring the rights of Traveller children**

- Play facilities should be provided in Traveller specific accommodation in line with Action 61 in NTRIS.
- 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.



## 1. TAP delivery and accountability

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It is important from the outset to stress the need for TAPs to align with existing policy and legislation, including Public Sector Equality and Human Rights Duty<sup>1</sup>; the National Traveller and Roma Inclusion Strategy (2017-2021)<sup>2</sup> and its soon to be successor strategy; Housing for All<sup>3</sup>; and the National Traveller Health Action Plan 2022-2027 (NTHAP).<sup>4</sup> The NTHAP, launched in November 2022 sets out to address serious inequalities in Traveller health through targeted and mainstream measures, with a clear implementation strategy. Part of this strategy is the HSE close working with other public bodies that provide services that impact on Traveller health and wellbeing.

Accommodation is a key social determinant of health affecting both mental and physical health. Goal 3 of NTHAP '*Address the social determinants of health through targeted and mainstreaming measures*' sets out to 'Ensure a whole of government and social determinants approach to addressing Traveller health inequalities in line with NTRIS, Healthy Ireland and Sláintecare'.

NTHAP is underpinned by partnership working; this includes, HSE Public health and regional Traveller health structures working alongside local authorities and government departments, as appropriate to address the social determinants of Traveller health (Action 36). The importance of access to good quality accommodation to enable and support positive health including mental health cannot be underestimated. Traveller engagement with mainstream health services, and in particular, their capacity to act on advice from health professionals across all HSE services is contingent on access to good quality accommodation. For example, the adherence to public health measures throughout the COVID-19 pandemic was dependent on the availability of suitable accommodation, with space for isolation measures and appropriate sanitation facilities. Building on from partnership working between Local Authorities and HSE Public Health during COVID, we welcome the continuation and strengthening of this partnership as part of the Traveller Accommodation Programme. We see a role for Public Health in supporting and advising the Local Authority in ensuring Traveller accommodation enables and supports good physical and mental health through various means including the provision of Health Impact Assessments for existing and planned Traveller Accommodation. As part of this process, it would be useful to set targets review over time in conjunction with HSE Public Health Partners.

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<sup>1</sup> As per Section 42 of the Irish Human Rights and Equality Act (IHREC) 2014 has established a positive duty on public sector bodies to:

- eliminate discrimination
- promote equality of opportunity and treatment
- protect human rights

This means that all public bodies in Ireland, including Local Authorities, have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, called the Public-Sector Equality and Human Rights Duty.

<sup>2</sup> National Traveller and Roma Inclusion Strategy (2017-2021) <https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

<sup>3</sup> Housing for All recognises that Travellers are overrepresented amongst the homeless population in Ireland and commits to a number of actions including working with Local Authorities and AHBs to improve the quality and quantity of delivery of Traveller-specific accommodation.

<sup>4</sup> National Traveller Health Action Plan 2022-2027: <https://www.hse.ie/eng/services/publications/socialinclusion/national-traveller-health-action-plan-2022-2027.pdf>



The development of the NTHAP was informed by a consultation process that included 4 regional consultations (including representatives from Local Authorities). The process conceded that the current structures for Traveller accommodation (i.e.) LTACCs are not reaching their potential; often lacking meaningful Traveller representation, are poorly attended and do not have enforcement powers. Further, a consistent message from each consultation was slow and poor implementation of Traveller accommodation TAPs, despite allocated budgets and targets.

The NTHAP consultation document stresses the need for current TAPs to ensure that budgets are spent for that purpose and is fully utilised, including the development of new accommodation where projected need is taken into account. Additionally, accountability for delivering Traveller accommodation is prioritised through a strong monitoring and evaluation framework.

Anti-Traveller racism and discrimination as well as a lack of Traveller cultural awareness affects the mental health of Travellers and can affect the planning and delivery of Traveller accommodation, through objections to proposed developments. NTHAP sees the provision of anti-racism and cultural awareness training as central to counteracting racism and ensuring appropriate cultural responses in addressing Traveller Health inequality. We are supporting the development of anti-racism and cultural awareness training in HSE services over the life of NTHAP. We suggest that councils take a similar approach in the making available anti-racism and cultural awareness training for initially for members of LTACCs. In addition, TAPs would benefit from actions to address anti-Traveller racism in the general community to support integration and improve Traveller mental and physical health.

**Recommendations:**

- Build on relationships established during COVID between Local Authorities and HSE Public Health to support and enable the provision of Traveller accommodation that supports and maintains good physical and mental health of Travellers.
- Ensure representation from Travellers on LTACC, nominated through Traveller organisations where Traveller organisations do not exist, NTACC to support nominations. Set a minimum number of representatives to ensure meaningful representation.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop and publish annual progress TAP reports to monitor progress; reports to be submitted to the Department of Housing Local Government and Heritage.
- Local Authorities to make available training in anti-Traveller racism and Traveller Cultural Awareness for LTACC members.



## 2. Social Determinants of Health

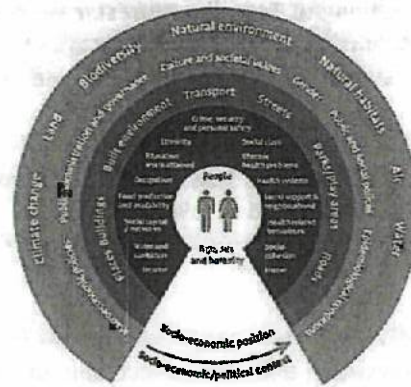


Fig. 1 Social Determinants of Health, NTHAP

Improved accommodation can save lives, prevent disease, increase quality of life and reduce poverty. 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 Sláintecare, Housing for All and the National Traveller Health Action Plan. 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 latest Healthy Ireland Implementation Plan 2023-2027 affirms this vision and makes strong commitments to addressing health inequalities through a whole government approach. The Strategy also promotes partnerships and cross-sectoral working including greater collaboration between health services and Local Authorities

The All Ireland Traveller Health Study (AITHS) (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.





While the findings of the All Ireland Traveller Health Study were published in 2010, the veracity of its findings has been endorsed by a number of subsequent State surveys and research reports, including by the EU Fundamental Rights Agency in its 2019 Travellers in Ireland Survey, and more recently, by the national census which that 15% of Travellers reported experiencing at least one long-lasting condition or difficulty to a great extent or a lot compared with 8% of all people living in Ireland.<sup>5</sup> Additionally, Census 2022 reported:

- Of all children under the age of 15 living in the State, 4% reported experiencing at least one long-lasting condition or difficulty to a great extent compared with 7% of Traveller children.
- The proportion of 15- to 29-year-old Irish Travellers experiencing at least one long-lasting condition or difficulty to a great extent (13%) was more than twice that of all people in the same age cohort (6%).
- Between the ages of 30 and 59, the proportion of the population experiencing at least one long-lasting condition or difficulty to a great extent was over three times higher for Irish Travellers (21%) than the total population (6%)

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 equivalent rate for the general population was 13.3%.<sup>6</sup> The average Traveller family is comprised of a married couple with children had an average of 4 persons per household compared with 2.7 for the general population. The 2022 Census found that the majority of Travellers are living in standard accommodation, primarily by renting from a Local Authority..

However, we note in most recent figures published by the Department of Housing<sup>7</sup>, reports an 18% increase in Traveller families in sharing housing or living on the side of the road, on unauthorised sites, without access to basic facilities. . This is in the context of severe overcrowding; with Traveller overcrowding seven times the national rate and disproportionate rates of Traveller homelessness.

As per the National Plan Against Racism, there is a recognition that systematic racism permeates throughout public services, adding further challenges to Travellers who are seeking appropriate support and accommodations provisions from their Local Authority. Therefore, the mainstreaming of anti-racism and discrimination in-service training for staff should be integrated into Local Authority processes.

Education is key social determinant of health. In the planning of Traveller Specific Accommodation, attention should be paid to how Traveller children and adults can access local education offerings. Education providers in the locality of planned developments should be included in the consultation process for development of Traveller specific accommodation with a view to raising awareness among those providers of the needs of the Traveller community, and ensuring those needs are included catered for locally.

<sup>5</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/#~:text=Census%202022%20Results&text=The%20number%20of%20Irish%20Travellers,per%201%2000%20of%20the%20population.>

<sup>6</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-cp8iter/p8iter/p8itd/>

<sup>7</sup> <https://www.gov.ie/en/collection/29c76-traveller-accommodation-statistics/#2022>



#### Recommendations:

- Culturally appropriate Traveller-specific accommodation should be developed and the needs of nomadic Travellers catered for *through provision of transient sites as recommended in the Housing (Traveller Accommodation) Act 1998.*
  - Traveller organisations should be directly involved in the accommodation needs assessments to capture the existing needs and projected needs as per TAP guidelines. This should be inclusive of Traveller families who are homeless and living on unauthorized sites.
  - 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 receive in-service anti-racism and discrimination training in order to comply with positive duty obligations and fulfil commitments as per the National Plan Against Racism.
- Education providers to be included in the development of TAPs to ensure and to support education providers in understanding Traveller education needs in their locality.

### 3. Impact of dispersal & private rented accommodation policy

The AITHS 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 socialize 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. 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 Housing Assistance Payment (HAP) and Rental Accommodation Scheme (RAS) scheme. Traveller families accommodated in this way remain invisible as Local Authority Social Housing Support/Assessment forms collect information on requests for Traveller specific accommodation, a request that is unlikely to be met by Local Authorities in the immediate future. While we acknowledge some progress in relation to the collection of ethnicity data by the Pathway Accommodation & Support System (PASS), through the implementation of a universal ethnic identifier, there are concerns that the social Housing Support application only applies this question to Travellers, which is contra to a human-rights based approach.

Where Traveller families are being accommodated in the private rental sector, particularly 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. As indicated in Census 2022 Traveller families are being squeezed out of the private rental market and are being placed in vulnerable situations, including homelessness, with figures reporting that 14% of Travellers were living in "temporary accommodation," which effectively means Traveller families and children living on the side of the road, without access to basic facilities. Traveller families, like all families, find this situation very stressful and it is having a negative impact on their health.

The TAPs are a key driver to address the crisis of accommodation and disproportionate impact of homelessness among Travellers. It is estimated that 39% of Travellers are homeless according to the ETHOS definition. Figures show from the Department of Housing that 1,561 Traveller families, or approximately 6,244 Travellers are living on the side of the road or doubling up in houses. It is important to note that Traveller families doubling/trebling up in bays, yards and facilities are not included in this dataset and therefore these figures underestimate the extent of the crisis. Women in particular are a particularly vulnerable group at risk of homelessness, and account for an estimated 50% of the homeless population, which is far higher than the national average. The impact of homelessness on Traveller women and children is profound; they experience layers of discrimination and have further difficulties in accessing public services, and can therefore be a "hidden" group of homeless.

The IHREC supports the analysis of Traveller homelessness, stating that "members of the Traveller Community are the most at risk of being homeless" and face further racism and discrimination in accessing housing in the public and private rental sector<sup>8</sup>. Local Authorities as the arbiter of culturally appropriate accommodation play a key role in preventing homelessness and the litany of health issues that are associated with this experience for Travellers, from isolation, addiction, domestic violence and increased risk of ill health and chronic conditions.

There is now a growing recognition in society that mental wellbeing is contingent 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 that accommodation provision is a key mediator of Traveller mental health, and that TAPs must take this into account.

**Recommendations:**

- Traveller-specific accommodation should be provided for in the TAP
- Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation
- A universal ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS.

<sup>8</sup> IHREC Discrimination and Inequality in Housing In Ireland, 2018



#### **4. Public Health and Environmental concerns**

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The National Traveller Health Action Plan recognises that importance of the environment in which Travellers are living as it relates to health outcomes. Many Travellers continue to live in very poor accommodation conditions and an unsafe physical environment which exposes families to communicable diseases such as influenza, rhinovirus, and infections. 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.

The chronic deprivation seen across Traveller accommodation and public health issues that resulted from this were further exacerbated throughout the COVID-19 pandemic. Essential public health messages then - of hand-washing, social distancing and self-isolating to protect against COVID-19 - would simply not be possible for many Travellers who lived in overcrowded conditions and had no access to running water. The provision of water, toilets, refurbishment, site works and additional mobile accommodation and space where there was overcrowding were made available due to the work of the THUs, Traveller organisations, HSE Public Health and the Local Authorities. It also made provision for self-isolating facilities, which included funding being made available to all Local Authorities to provide additional trailers (isolation units) where necessary. This mechanism and resulting works in partnership with Local Authorities and the local Traveller Health Units brought about many positive changes, however, recent data continues to show that overcrowding and homelessness is an increasing issue of concern, despite these interventions. Any further public health crises will continue to affect Travellers disproportionately where mitigating factors such as suitable accommodation remains to be an issue of concern.

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. Health impact assessments must be introduced into the design of Traveller accommodation, to ensure, at minimum, families can leave in an environment that will promote their general health and wellbeing.

For Travellers living on halting sites, in trailers and those living in energy inefficient homes group housing schemes, energy poverty is an issue and brings associated health problems. Census 2022 found the proportion of Irish Travellers living in private households who were living in trailers (caravans, mobile homes or other temporary accommodation) was 8% in 2022. The annual count of Traveller families undertaken by Local Authorities for the Department of





Housing Local Government and Heritage, would indicate a much higher figure (closer to the AITHS figure). It indicates 12% of families living on halting sites and another 7.6% living on authorised sites (trailers not on publicly approved sites or on private land).

This is significant, because we know the trailers (mobile homes/caravans) lived in by Travellers are not of a residential standard, are generally 15 years or older, have poor insulation and ventilation, with 77% of Travellers living in mobile homes/caravans in energy poverty<sup>9</sup>. While Traveller specific accommodation is built in line with standard national building regulations, including group housing schemes and halting site. There is no requirement that trailers/mobile homes lived in by Travellers are of residential standard. We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.

*'Cold indoor temperatures place thermal stress on the body and can affect the immune circulatory and cardiovascular systems. Cold homes generate mould damp and dust mites which can affect respiratory and allergic conditions. Energy Poverty adversely impacts people's ability to access essential services and it limits their socialising internet access healthy food options attendance at education facilities and work. Children who are at risk of fuel poverty have been identified as a particularly vulnerable group for longer term health implications.'*<sup>10</sup>

We know that climate change disproportionately affects disadvantaged groups not least Irish Travellers. Traveller Accommodation Programmes therefore must ensure that climate change considerations are comprehensively factored into the planning process for Traveller specific accommodation. Environmental concerns as they relate to the maintenance of positive mental and physical health should also be included in the planning process. Therefore, developments in terms of the location and layout of sites and the construction of individual accommodation units should be inclusive should be considered. It is important that Traveller Accommodation Programmes feature environmental and energy assessments the findings of which are incorporated into TAPs. As part of this process, plans should prioritize Traveller specific accommodation for climate mitigation and energy efficiency measures to ensure that accommodation is of good quality and can withstand the negative consequences of climate change. Traveller accommodation should be prioritised for energy efficiency measures.

<sup>9</sup> [https://www.citizensinformationboard.ie/downloads/social\\_policy/MABS\\_Energy\\_Poverty\\_Report\\_2019.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/MABS_Energy_Poverty_Report_2019.pdf)

<sup>10</sup> <https://www.lenus.ie/bitstream/handle/10147/634784/Rapid%20report%20on%20energy%20poverty%20ADPHLG%2019%20Oct%202022.pdf?sequence=1&isAllowed=y#:~:text=Cold%20homes%20generate%20mould%2C%20damp,at%20education%20facilities%20and%20work.>



#### **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.
- Learning and mechanisms used to support the provision Traveller accommodation provision throughout COVID-19 should be utilised and mainstreamed into TAP processes.
- We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.
- Environmental and Climate Change considerations to be factored into the planning of Traveller Accommodation.
- Traveller Accommodation should be prioritised for energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

#### **5. The needs of Traveller Children**

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Traveller families are larger than those in the general population, yet Travellers have fewer rooms in their homes than their settled counterparts (AITHS & Census 2022) 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. Action 61 in the National Traveller and Roma Inclusion Strategy (NTRIS) obliges Local Authorities, to ensure the need for access to safe, appropriate play areas when designing Traveller specific accommodation. Further, 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 Traveller 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, substance misuse 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 in line with Action 61 in NTRIS.
- 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.

END  
15<sup>th</sup> Feb 2024







## **Submission to Leitrim County Council on Preparation of Traveller Accommodation Programme**

Cena, as you are probably aware, is an Approved Housing Body. We work on accommodation needs exclusively for and with members of the Traveller community. We are a Traveller-led organisation and all of our outreach workers and Tenant Liaison Officers are fully trained members of the Traveller community.

### **The 'Needs Assessment' Process**

Cena places the utmost importance on the process of needs assessment. As well as having purchased homes and built homes in several local authority areas to date, we have also had in-depth engagement with Traveller families (through 'Feasibility Studies') in eight counties up to now. All of these initiatives have been undertaken on a Traveller-to-Traveller basis, and we have found that results emerging are much more reliable than what has been achieved through more traditional methods up to now. There are two reasons for this increased reliability:

1. Firstly, the Traveller-to-Traveller basis for consultation is centrally important. The trust that can be established in analysing accommodation needs is essential in getting a realistic and reliable picture of how accommodation needs can be addressed in the longer term.
2. Secondly, the extent and nature of accommodation needs means that a different approach is absolutely necessary. Answering a question about current accommodation needs is not an easy task where the family or individual is living in a crisis situation – and has often been living in crisis for some period of time. Our own experience, in opening up a discussion with Travellers, is that the question about long-term needs and preferences has never really been asked before. For example:
  - a. The needs assessment process people are used to is about identifying the kind of accommodation needed (A or B or C). Where options are limited, then responses are also limited (the options of D E or F are never considered)

- b. It is extremely difficult for those living in crisis to reflect on what their longer-term accommodation needs might be. It is more likely that responses will reflect what people need 'next week' (in response to current critical living conditions) rather than what they think is needed so their children (and even grandchildren) can have their accommodation needs met in a sustainable way. These kind of short-term responses, we would argue, add to problems in Traveller accommodation rather than relieving them. People will accept offers of accommodation that are not suitable or sustainable – leading to problems for them, their neighbours, and local authorities who find the families back on their housing list in a relatively short period of time.

Instead of 'needs assessment' the process we have developed through Cena we prefer to describe as 'creating the space where people can determine their own needs in an informed way'. This results in a more reliable understanding of what sustainable solutions might look like. But it also helps ensure that proposals are realistic – based on an understanding amongst respondents about what might be possible and what is not possible.

### Creating a County Wide 'Template' for the Needs Analysis Process

Cena are currently involved in rolling out this process, for the first time, on a county-wide basis. This is being undertaken in partnership with Clare County Council<sup>1</sup> and involves:

- An intensive training process, participants in which are all members of the Traveller community. The training equips participants with the knowledge and skills needed to engage with Traveller families county-wide. This was delivered in seven modules over a twelve-week period.
- In-depth engagement with every Traveller household in the County – using a detailed template for recording responses.
- Entry of results into a dedicated database.
- Recording of conclusions and recommendations for meeting needs.
- Analysis of results within a 'working group' framework. Cena will be engaging with Clare County Council periodically as results are compiled over the coming months. Results will provide a solid foundation for interpreting needs and identifying possible response over a longer period of time. Many of the plans to address need may therefore go well beyond the next TAP now being prepared. But the key focus will be on addressing what is possible to achieve over the coming five years (identifying the potential role of Cena and other AHBs, as well as the central role of local authority in delivery).

Cena are also using the same template to carry out a needs analysis in Longford. This is restricted for now to Traveller households in Longford Town, but with the intention of extending this county-wide at some stage – and certainly with the intention of incorporating these results into the next Longford TAP (using the same 'joint working group' model as established in Clare)

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<sup>1</sup> The Clare process is also being supported by the HSE, through SICAP, and in cooperation with Clare Traveller Community Development Project

## **Extending and Expanding on the Model of Engagement**

We fully understand the time commitments and scheduling restraints under which local authorities are now operating to ensure completion of the TAP planning process.

We do however, strongly recommend that, within the scope of your next TAP, you consider:

1. An acknowledgement of the need (and ultimate benefit) of a more in-depth, comprehensive and peer-based assessment of Traveller accommodation needs.
2. According priority to this as a specific action in your next TAP. We appreciate the time constraints involved and recognise the impossibility of this kind of process being completed in advance of signing off on your next TAP. If this was specified as an action in the first phase of your next TAP, however, then results from the process would be available at the interim review stage. And these could be incorporated into the second phase of implementation.

We intend to organise dedicated seminars, based on the process and results from County Clare. These will be initially held on a regional or provincial basis – beginning with Munster before the end of 2024. All interested local authority personnel will be invited to attend.





**National Traveller MABS Submission  
to the preparation of the  
Traveller Accommodation Programme 2025 – 2029**

**February 2024**



## **About National Traveller MABS**

National Traveller MABS, established in 2005, is a leading advocate for the financial inclusion of Travellers in Ireland.

National Traveller MABS works to reduce poverty, discrimination and the financial exclusion of Travellers. We work with the Traveller community and organisations to change policy and practice which impacts Travellers financially.

Our work involves helping Travellers access MABS and Citizens Information services, community education, research, and policy development.

National Traveller MABS works to end the financial exclusion of Travellers in Ireland by:

- Promoting and developing culturally appropriate financial education programmes.
- Supporting the development of a collaborative working relationship between local MABS, local Travellers and other relevant organisations.
- Working with partner organisations to address exclusion by developing alternatives to mainstream saving and borrowing
- Highlighting issues of over-indebtedness and exclusion from financial institutions, making appropriate responses through our research and policy work

In the past National Traveller MABS has supported Travellers in accessing culturally appropriate accommodation through a number of successful Caravan Loan Guarantee Schemes. A 2015 review of these schemes made a number of recommendations that may inform the provision of similar schemes<sup>1</sup>. In 2018 we also undertook a study into the cost of mobile home/trailers. This study also made a number of recommendations in relation to the provision of fuel efficient affordable culturally appropriate accommodation<sup>2</sup>. In 2022 we undertook further research in collaboration with Atlantic University Sligo into the energy

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<sup>1</sup> National Traveller MABS, *A Review of National Traveller MABS Supported Caravan Loan Guarantee Schemes*, (Dublin, 2015) <https://www.ntmabs.org/publications/policy/2015/a-review-of-national-traveller-mabs-supported-caravan-loan-guarantee-scheme.pdf>

<sup>2</sup> Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

efficiency of mobile homes and made further recommendations on providing energy efficient culturally appropriate homes<sup>3</sup>. We have also written an outline for a trailer rental scheme which we believe should run alongside the trailer loan scheme to give families the opportunity to live in residential standard, energy efficient homes regardless of their income<sup>4</sup>.

Local authorities have an integral role to play in ensuring the financial inclusion of Travellers through the development of the Traveller Accommodation Programme by ensuring that accommodation needs of Travellers in their area are properly addressed in a manner that is both equitable and culturally appropriate.

**Throughout this submission when we use the word trailer we are referring to a caravan/mobile home. Trailer is the preferred term used by Travellers.**

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<sup>3</sup> National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-version-oct2022.pdf>

<sup>4</sup> National Traveller MABS, *Proposal for a National Caravan Rental Scheme - The case for an alternative*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/caravan-rental-scheme.pdf>

## **Recommendations for the Traveller Accommodation Programme 2025-2029**

- **That local authorities incorporate an accessible and transparent application process and should signpost all potential applicants to their local MABS for free independent financial advice as well as providing a deduction at source mechanism for repayments.**
- **That the trailer loan amount on offer should be increased to between €60,000 and €80,000.**
- **That Traveller Accommodation Programmes introduce a caravan rental scheme for families who are not in a position to finance the purchase of a residential standard trailer.**
- **National Traveller MABS recommends that all local authorities support Travellers to access residential standard trailers and that all units provided to Travellers by the local authority be residential standard.**
- **Local authorities should facilitate energy efficiency information initiatives for Travellers living in mobiles.**
- **Local authorities should include more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers in the Traveller Accommodation Programme.**
- **That a full and robust consultation with the Traveller community in the local authority's area take place.**
- **That the Public Sector Duty be fully embraced by local authorities in the drawing up of the Traveller Accommodation Programme.**

- **The local authority should ensure that equality reviews be adapted into the Traveller Accommodation Programme as per the IHRC recommendation.**

## **Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029**

The provisions of the *Housing (Traveller Accommodation) Act 1998 Act* provide for public input and consultation at all stages of the preparation and implementation of Traveller Accommodation Programmes. Please find listed below National Traveller MABS recommendations for the Draft Traveller Accommodation Programme 2025-2029:

### **Trailer Loan Scheme**

National Traveller MABS is aware that local authorities, supported by the Department of Housing have reintroduced the trailer loan scheme on a pilot basis over the past number of years. We welcome this support of Travellers in accessing credit to purchase trailers.

National Traveller MABS recommends that all local authorities should have an easily accessible application process. This would involve:

- Advertising the scheme on the local authority website, making the local Traveller organisation(s) aware that the scheme is in operation, ensuring the local LTACC is aware the scheme is operating and advertising the scheme in local papers to ensure the community know the scheme is operating.
- Making application forms and scheme details available online as is the case with all other social housing schemes.
- Deadlines for applying for the scheme should be clearly advertised on the local authority's website.
- Application forms and information about the schemes should follow NALA's Plain English guidelines to ensure that they are understood. 1 in 4 adults in Ireland have a literacy difficulty and this number is significantly higher in the Traveller community.
- Signposting all potential applicants towards engagement with money management support services such as their local MABS office. It should be the decision of the potential applicant as to whether they choose to engage with MABS but they should be made aware that the service is available to them should they want it.



- Making provision for repayments to be deducted at source, subject to protected income considerations. The Household Budget Scheme would be the preferred mechanism for social welfare reliant applicants.

**Recommendation:** That local authorities incorporate an accessible and transparent application process and should signpost all potential applicants to their local MABS for free independent financial advice as well as providing a deduction at source mechanism for repayments.

The funding allocated for the scheme is often insufficient to meet the needs of the Traveller community, leading to the creation of long waiting lists and delays in families being able to access loans. The maximum loan amount available under the current scheme is €40,000. Research carried out by National Traveller MABS in conjunction with Atlantic University Sligo in 2023 found that trailers that conform to British Standard BS 3632, which mean the trailer is suitable for year round living and conforms to energy efficient status begin at €60,000. This price does not include disposal, installation, delivery and associated charges which can add another €10,000 to the price of the trailer.

Furthermore the purchasing power of the loan has been weakened as suppliers may increase prices of units when they know that the purchaser is buying under the scheme. These combined factors mean many families who have availed of the scheme are purchasing substandard trailers, not suitable for year round living, which are not energy efficient and which will have a limited lifespan. To offset these problems National Traveller MABS would recommend increasing the loan amount increased.

**Recommendation:** That the trailer loan amount on offer should be increased to between €60,000 and €80,000.

## **Trailer Rental Scheme**

Our recent research study into the cost of trailers found a range of trailers on offer ranging from €15,000 to over €100,000. However a residential standard trailer, one which is suitable for year round living and which conforms to the British Standard BS3626.2015 began at €60,000 for a two berth trailer. Residential standard trailers, as opposed to units used as holiday homes, are more fuel efficient and provide families with a better quality of accommodation. We acknowledge and know that some Traveller families on low incomes will not be in a position to purchase a residential standard trailer or qualify for the trailer loan scheme and this is feedback we have received from MABS money advisors and from local authorities during the current iteration of the trailer loan scheme. A rental scheme would ensure that Traveller families would be able to access good quality affordable accommodation. Our recent publication has called for and outlined how a trailer rental scheme could operate and could offer benefits to both families and the local authority and Government<sup>5</sup>.

**Recommendation: That Traveller Accommodation Programmes introduce a trailer rental scheme for families who are not in a position to finance the purchase of a residential standard trailer.**

## **Addressing fuel poverty**

National Traveller MABS is concerned with the reduction and elimination of fuel poverty in the Traveller community. Fuel poverty arises out of the relationship between household income, energy efficiency of the dwelling and fuel prices and is an acute problem for low income groups in particular. Households are deemed to be in fuel poverty when they spend 10% or more of their income on fuel<sup>6</sup>.

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<sup>5</sup> Proposal for a National Caravan Rental Scheme - The case for an alternative  
<https://www.ntmabs.org/publications/education/2022/caravan-rental-scheme.pdf>

<sup>6</sup> McAvoy, H. All Ireland Paper on Fuel Poverty and Health, (Dublin, Institute of Public Health in Ireland, 2007)

Research carried out by National Traveller MABS in 2019 found that 77% of Travellers living in trailers were living in energy poverty due to the poor insulation and lack of energy efficient measures<sup>7</sup>. A follow up study carried out in 2022 showed that a large majority of the Traveller families living in trailers surveyed (~75%) were paying between €120 - €360 on electricity, and €105- €400 on heating fuels (i.e. gas, coal wood) on a monthly basis<sup>8</sup>. The energy expenditure estimates from the survey carried out in this research were similar to that in the 2019 report showing that there has not been any significant improvement in reducing energy costs for Travellers living in trailers in the intervening years. The data was collected prior to the energy crisis price increases so we can safely assume that those figures have increased even further in the past two years.

National Traveller MABS research has clearly demonstrated that no residential standard trailers are less fuel efficient than those manufactured to a residential standard and the vast majority of trailers being lived in in Ireland are not residential standard. These trailers cost a huge amount to heat and it is virtually impossible to retain heat once the heat source is extinguished due to lack of insulation and double glazing. This therefore has implications for household expenditure and fuel poverty.

**Recommendation: National Traveller MABS recommends that all local authorities support Travellers to access residential standard trailers and that all units provided to Travellers by the local authority be residential standard.**

Local authorities in conjunction with SEAI and the Department of Climate and Communications and the Department of Housing Local Government and Heritage should facilitate energy efficiency information initiatives for Travellers living in trailers. This will start with modest targeted efforts and will hopefully produce a track record of success by focusing on accessible energy efficiency measures (i.e. the use of LED lights) that would contribute to reduced energy spend<sup>9</sup>. This could be achieved by employing and training

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<sup>7</sup> Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

<sup>8</sup> National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-version-oct2022.pdf>

<sup>9</sup> IBID



Travellers in each local authority area to act as trusted energy champions within the Traveller community. These energy efficiency information initiatives should be included in the Traveller Accommodation Programme as they should be offered in conjunction with any retrofitting that is being carried out to Traveller accommodation in the local authority area.

**Recommendation: Local authorities should facilitate energy efficiency information initiatives for Travellers living in trailers.**

There is a need for more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers<sup>10</sup>. Local authorities are in a prime position to be at the forefront of these initiatives. With 77% of Travellers in trailers living in energy poverty in 2019 we know that the situation has only gotten worse over the intervening years<sup>11</sup>. As part of retrofitting of Traveller specific accommodation and when planning new sites consideration should be given to the installation of green energy technologies. These could include the installation of wind turbines on sites which would have the potential to power the entire halting site, removing the need for commercial electricity and also allowing for the local authority to be able to sell energy back into the national grid. Another potential solution could be planning for the installation of solar panels on halting sites. Currently there are issues with installing panels on halting sites due to the tight dimensions of the bays and regulations regarding the closeness of structures to fire walls etc. With a little foresight and sound technological advice from technical experts in SEAI as well as grants from SEAI community funds etc. local authorities are uniquely positioned to be at the forefront of incorporating green technologies into Traveller specific accommodation as well as addressing and reducing fuel poverty among the community.

**Recommendation: Local authorities should include more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers in the Traveller Accommodation Programme.**

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<sup>10</sup> National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-version-oct2022.pdf>

<sup>11</sup> Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

## **Community Consultation**

Community consultation is important for local authorities in drawing up a Traveller Accommodation Programme in Ireland for several reasons:

1. **Inclusivity:** Community consultation ensures that all stakeholders, including members of the Traveller community, have a voice in the decision-making process. This helps to create a more inclusive and representative programme that meets the needs of all residents.
2. **Transparency:** Consulting with the community helps to build trust and transparency in the decision-making process. It allows residents to understand the rationale behind decisions and provides an opportunity for feedback and input.
3. **Local knowledge:** Local residents often have valuable insights and knowledge about the needs and preferences of the Traveller community in their area. Consultation helps to tap into this local knowledge and ensure that the programme is tailored to the specific needs of the community.
4. **Legal requirements:** Local authorities in Ireland are legally required to consult with residents and stakeholders when developing Traveller Accommodation Programmes. Failure to consult can lead to legal challenges and delays in the implementation of the programme. Circular 35/2018 emphasizes the importance of local authorities working closely with representative bodies of the Traveller community.

Overall, community consultation is essential for promoting accountability, legitimacy, and effectiveness in the development of Traveller Accommodation Programmes in Ireland. It helps to ensure that the programme is well-informed, inclusive, and reflective of the needs and aspirations of all residents.

**Recommendation: That a full and robust consultation with the Traveller community in the local authority's area take place.**



## **Public Sector Duty**

In Ireland, the public sector duty is a legal obligation placed on public bodies to promote equality and prevent discrimination in the delivery of their services. This duty is outlined in the Irish Human Rights and Equality Commission Act 2014 and applies to all public bodies in Ireland, including government departments, local authorities, and state agencies.

One area where the public sector duty is particularly relevant is in relation to the provision of Traveller accommodation. Travellers are an ethnic minority group in Ireland who have a specific accommodation need due to their nomadic and traditional way of life. Under the Housing (Traveller Accommodation) Act 1998, local authorities have a statutory obligation to provide adequate and appropriate accommodation for Traveller families.

In implementing the Traveller Accommodation Programme, public bodies are required to ensure that they are promoting equality and preventing discrimination against Travellers in the planning, design, and provision of accommodation services. This includes consulting with Traveller communities, ensuring that Traveller-specific needs are met, and taking measures to address any inequalities or barriers that may exist.

The public sector duty also requires public bodies to monitor and review their policies and practices to ensure that they are compliant with equality and human rights legislation. Failure to comply with the duty can result in legal action and potential sanctions.

Overall, the public sector duty in Ireland plays a crucial role in ensuring that Travellers are able to access adequate and appropriate accommodation that meets their specific needs and respects their rights as an ethnic minority group and it is imperative that it is taken into consideration in the Traveller Accommodation Programme.

**Recommendation: That the Public Sector Duty be fully embraced by local authorities in the drawing up of the Traveller Accommodation Programme.**

## **Equality Reviews**

The lessons learned from the IHRC equality reviews should be adapted into the TAP to . The Irish Human Rights and Equality Commission is an independent statutory body in Ireland tasked with promoting and protecting human rights and equality. The Commission has highlighted the importance of equality reviews in assessing and improving Traveller Accommodation Programmes across Ireland. In a report published in 2021, the Commission highlighted the ongoing inequality and marginalisation faced by the Traveller community in accessing suitable and adequate accommodation<sup>12</sup>.

The Commission emphasized the need for effective monitoring and evaluation of Traveller Accommodation Programmes to ensure that they meet international human rights standards and effectively address the needs of the Traveller community. The Commission called for a rights-based approach to be adopted in the development and implementation of these programmes, with a focus on ensuring the meaningful participation and consultation of Travellers in decision-making processes.

The Commission's stance on equality reviews and Traveller Accommodation Programmes is that they are essential tools in advancing human rights and equality for the Traveller community in Ireland.

**Recommendation: The local authority should ensure that the learning from the equality reviews be adapted into the Traveller Accommodation Programme.**

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<sup>12</sup> IHRC, *Accounts of First Council-by-Council Equality Review on Traveller Accommodation in History of State Published* <https://www.ihrec.ie/accounts-of-first-council-by-council-equality-review-on-traveller-accommodation-in-history-of-state-published/>





**CÚRAM SLÁINTE POBAIL  
COMMUNITY HEALTHCARE**

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CAYAN DONEGAL LEITRIM MONAGHAN SLIGO

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8<sup>th</sup> February 2024

Dear Chief Officer,

Please find for your consideration the submission from the Traveller Health Unit (THU) in the Eastern Region to the Traveller Accommodation Programme 2025-2029

In this submission, we have highlighted five key areas which affect Travellers' health and are existing policy commitments which we believe needs to be taken account of in the development of the Traveller Accommodation Programme (TAPs)2024-2029. Namely:

1. Delivery and accountability of TAPs
2. Impact of accommodation policy as a driver of the social determinants on health
3. Impact of dispersal & private rented accommodation policy
4. Public health and environmental concerns
5. Safety of Traveller Children

We believe it is imperative that the health impacts, including public health concerns, of the living environment are seriously addressed in the development of the new TAPs.

Yours sincerely

Patricia Garland  
Social Inclusion Manager CH CDLMS





**Submission to Local Authorities Traveller Accommodation Plans (January 2024)**







## North West Traveller Health Unit

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The NW Traveller Health Unit (THU) covers the Community Healthcare region Cavan Donegal Leitrim Monaghan and Sligo (CH CDLMS). The Traveller Health Unit (THU) work plan is implemented through regional THU initiatives; The Hse funds Six Traveller health projects, including five Primary Health Care for Travellers Projects (PHCPs) and a local health initiative in Sligo for mental health support, Donegal Older Person service and Monaghan Primary Health Care development project. The PHCPs employ Traveller Community Health Workers who undertake health advocacy in a range of health arenas, e.g., mental health, health education; child and infant health; immunisations and health alerts; addiction; diet and exercise; health and well-being; women's health; men's health; and social determinants work including accommodation and environmental health issues. The key objective of the NW THU is to enhance Traveller health status, improve the capacity of mainstream health services to respond to Traveller needs and respond to the social determinants that are at the root of Traveller health inequalities. This work is underpinned by a partnership approach, which is crucial in supporting collective and coordinated responses to addressing Traveller health inequalities.

## Introduction

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The NW Traveller Health Unit welcomes the opportunity to make this submission to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2024-2029. We acknowledge some progress 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 positive relations between HSE staff and the local authorities in this THU region in working collaboratively in Traveller inter-agency work over many years. This was particularly evident during COVID-19 whereby HSE (including HSE Public Health), local authorities and the THU worked positively together to try to mitigate the worst of the impact of the virus among Travellers. It is imperative that this positive engagement continues going forward given the importance of accommodation in relation to the social determinants of health.

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 North West covers Sligo, Leitrim and Donegal and with the establishment of the Community Health Organisations in 2015 Cavan and Monaghan joined the NW THU. The aim of the Traveller Health Units is to priorities' 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 five key areas, which affect Travellers health, which are existing policy commitments which we believe need to be taken account of in the development of the Traveller Accommodation Programme 2025-2029. Namely:

1. Delivery and accountability of TAPs
2. Impact of accommodation policy as a driver of the social determinants on health
3. Impact of dispersal policy and slow pace in development of Traveller specific accommodation
4. Public health and environmental concerns
5. Safety of Traveller Children

#### Recommendations for Traveller Accommodation Programmes

##### 1. Support delivery of robust TAPs through accountability

- Build on relationships established during COVID between Local Authorities and HSE Public Health to support and enable the provision of Traveller accommodation that supports and maintains positive physical and mental health for Travellers.
- Ensure representation from Travellers on LTACC, nominated through Traveller organisations where Traveller organisations do not exist, NTACC to support nominations. Set a minimum number of representatives to ensure meaningful representation.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop and publish annual progress TAP reports to monitor progress; reports to be submitted to the Department of Housing Local Government and Heritage.
- Local Authorities to make available training in anti-Traveller racism and Traveller Cultural Awareness for LTACC members.

##### 2. Address the Social Determinants of Health

- Culturally appropriate Traveller-specific accommodation should be developed and the needs of nomadic Travellers catered for *through provision of transient sites as recommended in the Housing (Traveller Accommodation) Act 1998.*
- Traveller organisations should be directly involved in the accommodation needs assessments to capture the existing needs and projected needs as per TAP guidelines. This should be inclusive of Traveller families who are homeless and living on unauthorized sites.
- 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 receive in-service anti-racism and discrimination training in order to comply with positive duty obligations and fulfil commitments as per the National Plan Against Racism.



**3. Recognition of the impact of dispersal & private rented accommodation policy in Traveller homelessness**

- Traveller-specific accommodation should be provided for in the TAP
- Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation
- A universal ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS

**4. Ensure a holistic approach to Traveller accommodation needs, including public health and environmental concerns**

- 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.
- Learning and mechanisms used to support the provision Traveller accommodation provision throughout COVID-19 should be utilised and mainstreamed into TAP processes
- We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.
- Environmental and Climate Change considerations to be factored into the planning of Traveller Accommodation.
- Traveller Accommodation should be prioritised for energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

**5. Future-proofing and ensuring the rights of Traveller children**

- Play facilities should be provided in Traveller specific accommodation in line with Action 61 in NTRIS.
- 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.



## 1. TAP delivery and accountability

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It is important from the outset to stress the need for TAPs to align with existing policy and legislation, including Public Sector Equality and Human Rights Duty<sup>1</sup>; the National Traveller and Roma Inclusion Strategy (2017-2021)<sup>2</sup> and its soon to be successor strategy; Housing for All<sup>3</sup>; and the National Traveller Health Action Plan 2022-2027 (NTHAP).<sup>4</sup> The NTHAP, launched in November 2022 sets out to address serious inequalities in Traveller health through targeted and mainstream measures, with a clear implementation strategy. Part of this strategy is the HSE close working with other public bodies that provide services that impact on Traveller health and wellbeing.

Accommodation is a key social determinant of health affecting both mental and physical health. Goal 3 of NTHAP *'Address the social determinants of health through targeted and mainstreaming measures'* sets out to 'Ensure a whole of government and social determinants approach to addressing Traveller health inequalities in line with NTRIS, Healthy Ireland and Sláintecare'.

NTHAP is underpinned by partnership working; this includes, HSE Public health and regional Traveller health structures working alongside local authorities and government departments, as appropriate to address the social determinants of Traveller health (Action 36). The importance of access to good quality accommodation to enable and support positive health including mental health cannot be underestimated. Traveller engagement with mainstream health services, and in particular, their capacity to act on advice from health professionals across all HSE services is contingent on access to good quality accommodation. For example, the adherence to public health measures throughout the COVID-19 pandemic was dependent on the availability of suitable accommodation, with space for isolation measures and appropriate sanitation facilities. Building on from partnership working between Local Authorities and HSE Public Health during COVID, we welcome the continuation and strengthening of this partnership as part of the Traveller Accommodation Programme. We see a role for Public Health in supporting and advising the Local Authority in ensuring Traveller accommodation enables and supports good physical and mental health through various means including the provision of Health Impact Assessments for existing and planned Traveller Accommodation. As part of this process, it would be useful to set targets review over time in conjunction with HSE Public Health Partners.

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<sup>1</sup> As per Section 42 of the Irish Human Rights and Equality Act (IHREC) 2014 has established a positive duty on public sector bodies to:

- eliminate discrimination
- promote equality of opportunity and treatment
- protect human rights

This means that all public bodies in Ireland, including Local Authorities, have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, called the Public-Sector Equality and Human Rights Duty.

<sup>2</sup> National Traveller and Roma Inclusion Strategy (2017-2021) <https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

<sup>3</sup> Housing for All recognises that Travellers are overrepresented amongst the homeless population in Ireland and commits to a number of actions including working with Local Authorities and AHBs to improve the quality and quantity of delivery of Traveller-specific accommodation.

<sup>4</sup> National Traveller Health Action Plan 2022-2027: <https://www.hse.ie/eng/services/publications/socialinclusion/national-traveller-health-action-plan-2022-2027.pdf>



The development of the NTHAP was informed by a consultation process that included 4 regional consultation (including representatives from Local Authorities). The process conceded that the current structures for Traveller accommodation (i.e.) LTACCs are not reaching their potential; often lacking meaningful Traveller representation, are poorly attended and do not have enforcement powers. Further, a consistent message from each consultation was slow and poor implementation of Traveller accommodation TAPs, despite allocated budgets and targets.

The NTHAP consultation document stresses the need for current TAPs to ensure that budgets are spent for that purpose and is fully utilised, including the development of new accommodation where projected need is taken into account. Additionally, accountability for delivering Traveller accommodation is prioritised through a strong monitoring and evaluation framework.

Anti-Traveller racism and discrimination as well as a lack of Traveller cultural awareness affects the mental health of Travellers and can affect the planning and delivery of Traveller accommodation, through objections to proposed developments. NTHAP sees the provision of anti-racism and cultural awareness training as central to counteracting racism and ensuring appropriate cultural responses in addressing Traveller Health Inequality. We are supporting the development of anti-racism and cultural awareness training in HSE services over the life of NTHAP. We suggest that councils take a similar approach in the making available anti-racism and cultural awareness training for initially for members of LTACCs. In addition, TAPs would benefit from actions to address anti-Traveller racism in the general community to support integration and improve Traveller mental and physical health.

**Recommendations:**

- Build on relationships established during COVID between Local Authorities and HSE Public Health to support and enable the provision of Traveller accommodation that supports and maintains good physical and mental health of Travellers.
- Ensure representation from Travellers on LTACC, nominated through Traveller organisations where Traveller organisations do not exist, NTACC to support nominations. Set a minimum number of representatives to ensure meaningful representation.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop and publish annual progress TAP reports to monitor progress; reports to be submitted to the Department of Housing Local Government and Heritage.
- Local Authorities to make available training in anti-Traveller racism and Traveller Cultural Awareness for LTACC members.



## 2. Social Determinants of Health

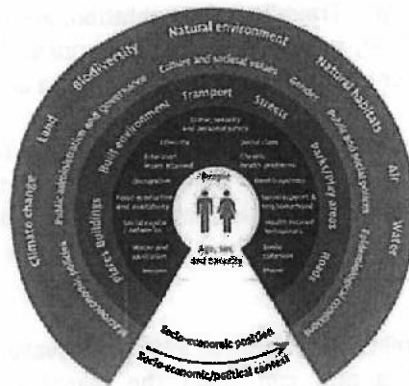


Fig. 1 Social Determinants of Health, NTHAP

Improved accommodation can save lives, prevent disease, increase quality of life and reduce poverty. 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 Sláintecare, Housing for All and the National Traveller Health Action Plan. 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 latest Healthy Ireland Implementation Plan 2023-2027 affirms this vision and makes strong commitments to addressing health inequalities through a whole government approach. The Strategy also promotes partnerships and cross-sectoral working including greater collaboration between health services and Local Authorities

The All Ireland Traveller Health Study (AITHS) (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.



While the findings of the All Ireland Traveller Health Study were published in 2010, the veracity of its findings has been endorsed by a number of subsequent State surveys and research reports, including by the EU Fundamental Rights Agency in its 2019 Travellers in Ireland Survey, and more recently, by the national census which that 15% of Travellers reported experiencing at least one long-lasting condition or difficulty to a great extent or a lot compared with 8% of all people living in Ireland.<sup>5</sup> Additionally, Census 2022 reported:

- Of all children under the age of 15 living in the State, 4% reported experiencing at least one long-lasting condition or difficulty to a great extent compared with 7% of Traveller children.
- The proportion of 15- to 29-year-old Irish Travellers experiencing at least one long-lasting condition or difficulty to a great extent (13%) was more than twice that of all people in the same age cohort (6%).
- Between the ages of 30 and 59, the proportion of the population experiencing at least one long-lasting condition or difficulty to a great extent was over three times higher for Irish Travellers (21%) than the total population (6%)

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 equivalent rate for the general population was 13.3%.<sup>6</sup> The average Traveller family is comprised of a married couple with children had an average of 4 persons per household compared with 2.7 for the general population. The 2022 Census found that the majority of Travellers are living in standard accommodation, primarily by renting from a Local Authority..

However, we note in most recent figures published by the Department of Housing<sup>7</sup>, reports an 18% increase in Traveller families in sharing housing or living on the side of the road, on unauthorised sites, without access to basic facilities. . This is in the context of severe overcrowding; with Traveller overcrowding seven times the national rate and disproportionate rates of Traveller homelessness.

As per the National Plan Against Racism, there is a recognition that systematic racism permeates throughout public services, adding further challenges to Travellers who are seeking appropriate support and accommodations provisions from their Local Authority. Therefore, the mainstreaming of anti-racism and discrimination in-service training for staff should be integrated into Local Authority processes.

Education is key social determinant of health. In the planning of Traveller Specific Accommodation, attention should be paid to how Traveller children and adults can access local education offerings. Education providers in the locality of planned developments should be included in the consultation process for development of Traveller specific accommodation with a view to raising awareness among those providers of the needs of the Traveller community, and ensuing those needs are included catered for locally.

<sup>5</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/#:~:text=Census%202022%20Results&text=The%20number%20of%20Irish%20Travellers,per%201%2C000%20of%20the%20population.>

<sup>6</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-cp8iter/p8iter/p8itd/>

<sup>7</sup> <https://www.gov.ie/en/collection/29c76-traveller-accommodation-statistics/#2022>



**Recommendations:**

- Culturally appropriate Traveller-specific accommodation should be developed and the needs of nomadic Travellers catered for *through provision of transient sites as recommended in the Housing (Traveller Accommodation) Act 1998.*
  - Traveller organisations should be directly involved in the accommodation needs assessments to capture the existing needs and projected needs as per TAP guidelines. This should be inclusive of Traveller families who are homeless and living on unauthorized sites.
  - 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 receive in-service anti-racism and discrimination training in order to comply with positive duty obligations and fulfil commitments as per the National Plan Against Racism.
  - Education providers to be included in the development of TAPs to ensure and to support education providers in understanding Traveller education needs in their locality.

**3. Impact of dispersal & private rented accommodation policy**

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The AIHRS 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 socialize 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. 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 Housing Assistance Payment (HAP) and Rental Accommodation Scheme (RAS) scheme. Traveller families accommodated in this way remain invisible as Local Authority Social Housing Support/Assessment forms collect information on requests for Traveller specific accommodation, a request that is unlikely to be met by Local Authorities in the immediate future. While we acknowledge some progress in relation to the collection of ethnicity data by the Pathway Accommodation & Support System (PASS), through the implementation of a universal ethnic identifier, there are concerns that the social Housing Support application only applies this question to Travellers, which is contra to a human-rights based approach.

Where Traveller families are being accommodated in the private rental sector, particularly 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. As indicated in Census 2022 Traveller families are being squeezed out of the private rental market and are being placed in vulnerable situations, including homelessness, with figures reporting that 14% of Travellers were living in "temporary accommodation," which effectively means Traveller families and children living on the side of the road, without access to basic facilities. Traveller families, like all families, find this situation very stressful and it is having a negative impact on their health.

The TAPs are a key driver to address the crisis of accommodation and disproportionate impact of homelessness among Travellers. It is estimated that 39% of Travellers are homeless according to the ETHOS definition. Figures show from the Department of Housing that 1,561 Traveller families, or approximately 6,244 Travellers are living on the side of the road or doubling up in houses. It is important to note that Traveller families doubling/trebling up in bays, yards and facilities are not included in this dataset and therefore these figures underestimate the extent of the crisis. Women in particular are a particularly vulnerable group at risk of homelessness, and account for an estimated 50% of the homeless population, which is far higher than the national average. The impact of homelessness on Traveller women and children is profound; they experience layers of discrimination and have further difficulties in accessing public services, and can therefore be a "hidden" group of homeless.

The IHREC supports the analysis of Traveller homelessness, stating that "members of the Traveller Community are the most at risk of being homeless" and face further racism and discrimination in accessing housing in the public and private rental sector<sup>8</sup>. Local Authorities as the arbiter of culturally appropriate accommodation play a key role in preventing homelessness and the litany of health issues that are associated with this experience for Travellers, from isolation, addiction, domestic violence and increased risk of ill health and chronic conditions.

There is now a growing recognition in society that mental wellbeing is contingent 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 that accommodation provision is a key mediator of Traveller mental health, and that TAPs must take this into account.

#### Recommendations:

- Traveller-specific accommodation should be provided for in the TAP
- Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation
- A universal ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS.

<sup>8</sup> IHREC Discrimination and Inequality in Housing in Ireland, 2018



#### 4. Public Health and Environmental concerns

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The National Traveller Health Action Plan recognises that importance of the environment in which Travellers are living as it relates to health outcomes. Many Travellers continue to live in very poor accommodation conditions and an unsafe physical environment which exposes families to communicable diseases such as influenza, rhinovirus, and infections. 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.

The chronic deprivation seen across Traveller accommodation and public health issues that resulted from this were further exacerbated throughout the COVID-19 pandemic. Essential public health messages then - of hand-washing, social distancing and self-isolating to protect against COVID-19 - would simply not be possible for many Travellers who lived in overcrowded conditions and had no access to running water. The provision of water, toilets, refurbishment, site works and additional mobile accommodation and space where there was overcrowding were made available due to the work of the THUs, Traveller organisations, HSE Public Health and the Local Authorities. It also made provision for self-isolating facilities, which included funding being made available to all Local Authorities to provide additional trailers (isolation units) where necessary. This mechanism and resulting works in partnership with Local Authorities and the local Traveller Health Units brought about many positive changes, however, recent data continues to show that overcrowding and homelessness is an increasing issue of concern, despite these interventions. Any further public health crises will continue to affect Travellers disproportionately where mitigating factors such as suitable accommodation remains to be an issue of concern.

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. Health impact assessments must be introduced into the design of Traveller accommodation, to ensure, at minimum, families can leave in an environment that will promote their general health and wellbeing.

For Travellers living on halting sites, in trailers and those living in energy inefficient homes group housing schemes, energy poverty is an issue and brings associated health problems. Census 2022 found the proportion of Irish Travellers living in private households who were living in trailers (caravans, mobile homes or other temporary accommodation) was 8% in 2022. The annual count of Traveller families undertaken by Local Authorities for the Department of





Housing Local Government and Heritage, would indicate a much higher figure (closer to the AITHS figure). It indicates 12% of families living on halting sites and another 7.6% living on authorised sites (trailers not on publicly approved sites or on private land).

This is significant, because we know the trailers (mobile homes/caravans) lived in by Travellers are not of a residential standard, are generally 15 years or older, have poor insulation and ventilation, with 77% of Travellers living in mobile homes/caravans in energy poverty<sup>9</sup>. While Traveller specific accommodation is built in line with standard national building regulations, including group housing schemes and halting site. There is no requirement that trailers/mobile homes lived in by Travellers are of residential standard. We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.

*'Cold indoor temperatures place thermal stress on the body and can affect the immune circulatory and cardiovascular systems. Cold homes generate mould damp and dust mites which can affect respiratory and allergic conditions. Energy Poverty adversely impacts people's ability to access essential services and it limits their socialising internet access healthy food options attendance at education facilities and work. Children who are at risk of fuel poverty have been identified as a particularly vulnerable group for longer term health implications.'*<sup>10</sup>

We know that climate change disproportionately affects disadvantaged groups not least Irish Travellers. Traveller Accommodation Programmes therefore must ensure that climate change considerations are comprehensively factored into the planning process for Traveller specific accommodation. Environmental concerns as they relate to the maintenance of positive mental and physical health should also be included in the planning process. Therefore, developments in terms of the location and layout of sites and the construction of individual accommodation units should be inclusive should be considered. It is important that Traveller Accommodation Programmes feature environmental and energy assessments the findings of which are incorporated into TAPs. As part of this process, plans should prioritize Traveller specific accommodation for climate mitigation and energy efficiency measures to ensure that accommodation is of good quality and can withstand the negative consequences of climate change. Traveller accommodation should be prioritised for energy efficiency measures.

<sup>9</sup> [https://www.citizensinformationboard.ie/downloads/social\\_policy/MABS\\_Energy\\_Poverty\\_Report\\_2019.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/MABS_Energy_Poverty_Report_2019.pdf)

<sup>10</sup> <https://www.lenus.ie/bitstream/handle/10147/634784/Rapid%20report%20on%20energy%20poverty%20ADPHLG%2019%20Oct%202022.pdf?sequence=1&isAllowed=y#:~:text=Cold%20homes%20generate%20mould%2C%20damp,at%20education%20facilities%20and%20work.>



#### 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.
- Learning and mechanisms used to support the provision Traveller accommodation provision throughout COVID-19 should be utilised and mainstreamed into TAP processes.
- We recommend that Local Authorities ensure that Caravan Loan/ Rental schemes provide for residential standard mobile homes to British Standard BS3632.
- Environmental and Climate Change considerations to be factored into the planning of Traveller Accommodation.
- Traveller Accommodation should be prioritised for energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

#### 5. The needs of Traveller Children

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Traveller families are larger than those in the general population, yet Travellers have fewer rooms in their homes than their settled counterparts (AITHS & Census 2022) 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. Action 61 in the National Traveller and Roma Inclusion Strategy (NTRIS) obliges Local Authorities, to ensure the need for access to safe, appropriate play areas when designing Traveller specific accommodation. Further, 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 Traveller 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, substance misuse 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 in line with Action 61 in NTRIS.
- 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.

END  
15<sup>th</sup> Feb 2024

