



Public
Participation
Network
Sligo



Sligo PPN Housing Thematic Network

Traveller Accommodation

About this Series

In recent years the issue of housing has become an increasingly critical priority for the Sligo community. Issues around housing have been a constant across PPN community engagement and consultation processes, notably the Community Vision for Wellbeing. Some of the comments raised through this process included;;

We need a variety of house types within communities throughout the County to allow for households down-sizing or trading up as needed within the same area and for a variety of income groups.

There should also be sheltered housing provided in community settings.

A variety of schemes need to be introduced to ensure that homes are affordable.

Everyone in Sligo should have a suitable home and the Council should ensure that derelict or abandoned buildings are put back into use to provide a variety of housing options.

Planning should ensure future proofed building design wherever possible to create the opportunity for adaptation as family/ household needs change.

People need to be encouraged to live in small towns and villages, redevelop houses as needed and enabled to develop accommodation alongside small businesses.

In looking at the potential for the Community sector and PPN to use their platform to try and progress these issues, the Sligo PPN Thematic Housing Network was established by Sligo PPN representatives who brought together key stakeholders to discuss and collaborate.

The network decided to develop a series of policy papers addressing key agreed upon housing issues. The papers would be used by PPN representatives at the decision making table, would be presented by Sligo PPN representatives to the relevant government departments and would also be made public for use by the community sector.

These papers were compiled by the Sligo Public Participation Network (PPN) Housing Thematic Network with assistance from Social Justice Ireland, who were commissioned to carry out the research and compile the first drafts.

There are 5 papers in total;

This paper is about **Traveller Accommodation**

The other four papers in this series are titled:

Vacant Homes

Home Heating Costs

Right Sizing

Removing Barriers to Housing.

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Introduction

Sligo Housing Thematic Network has prepared this paper on the topic of traveller accommodation in the county. In light of the housing crisis being experienced across both the country and county, ensuring that everyone has access to safe, secure, sustainable, affordable and culturally appropriate accommodation is vital and key to the ability to exercise all other rights. This short paper sets out the situation according to available data across the county and some of the policy initiatives that may assist in addressing the issues.

Traveller population in Sligo

Travellers in Ireland are a distinct and separate nomadic indigenous Irish people and since 1st of March 2017 are recognised as an ethnic minority group by the Irish government.

The Housing (Miscellaneous Provisions) Act, 2002, Part IIA sets out ‘Offences Relating to Entering and Occupying Land Without Consent’¹ which effectively put an end to the nomadic way of life in Ireland, criminalising this integral aspect of Traveller culture. Accordingly, the terms ‘halting site’ or ‘transient site’ are still widely used but increasingly inaccurate as many families can no longer move from one place to another and tend to stay put on these sites.

According to the latest figures from Census 2022 which captures “Irish Travellers usually resident and present in the State”², there were 418 Irish Travellers resident in Sligo. 189 are male and 229 are female. Six in every 1,000 people in Sligo are Irish Traveller. This figure is an increase from 384 in Census 2016 and almost the same as 417 in 2011. Many Travellers are likely to be missed by censuses and some in Sligo would not have filled in census forms. However, for 2023-2024, the Sligo Traveller Support Group reports 778 Travellers in Sligo, 640 of whom are transient.

Across the country, the structure of the Irish Traveller population is very different to that of the general population, with a broad base at the younger end of the age spectrum which reduces quite sharply at higher ages. All of these age groups need to have their future accommodation needs taken into account whilst keeping focus on the fact that ‘Travellers have specific cultural considerations with regard to housing that must be taken into account, such as larger family sizes, the tradition of nomadism, the use of caravans and horsemanship’.³

The average age for the Irish Traveller population is 27 years, compared with 39 years for total population in Census 2022. At a national level, 15 per cent of the total population was aged 65 years and older while for Irish Travellers, the equivalent figure was just 5 per cent. 26 per cent of the Traveller population reported experiencing at least one long-lasting condition or difficulty to any extent, compared with 22 per cent of the total population living in the State.

This has an impact on the housing, educational and healthcare needs of the Traveller population. Also of note is the fact that “Travellers were more urbanised than the general population with nearly 8 in 10 (78.6%) living in cities or towns (1,500 or more), compared with 62.4 per cent of the total population”.⁴

¹ <https://www.irishstatutebook.ie/eli/2002/act/9/section/24>

² <https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityiris/travellersreligion/irishtravellers/> Accessed November 9th 2023.

³ https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_key_issues_affecting_the_traveller_community/reports/2021/2021-12-01_final-report-of-the-joint-committee-on-key-issues-affecting-the-traveller-community_en.pdf

⁴ <https://www.cso.ie/en/releasesandpublications/ep/p-cp8iter/p8iter/p8itd/> Accessed May 3rd 2023

According to the 2022 Annual Count of Traveller Families in Local Authority, Local Authority Assisted Accommodation and on Unauthorised Halting Sites published by the Department of Housing, Local Government and Heritage⁵ in Sligo, there were a total of 106 families of which:

46 families were living in standard local authority housing;

2 families in local authority group housing;

11 families in private houses assisted by local authority;

15 families in housing provided by voluntary bodies with local authority assistance;

29 families in local authority halting sites;

3 families in Unauthorised Sites.

Housing Need

Access to adequate housing is a fundamental human right. Without proper shelter it is virtually impossible to participate fully in society, to live a life with dignity, or to protect health and personal safety. In its Programme for Government⁶, the Government committed to “securing good livelihoods from our land and housing for all”.

Many Travellers prefer to live in culturally appropriate or Traveller specific housing such as “group housing schemes where large extended families live together based on Travellers’ shared identity”.⁷ The Joint Committee on Key Issues Affecting the Traveller Community Final Report notes that ‘The Traveller led approved housing body Cena (Culturally Appropriate Homes CLG) is engaging with members of the Traveller community and working with architects to properly define what culturally appropriate accommodation for Travellers looks like.’

According to statistics compiled by the Department of Housing, Planning and Local Government, nationwide, the number of families in all Traveller accommodation increased by eight per cent between 2019 and 2021. Almost two-thirds of Traveller families were accommodated by Local Authorities or Approved Housing Bodies, 16.1 per cent were accommodated in the Private Rented Sector, 7.5 per cent from within their own resources, 7.1 per cent in shared accommodation, and 4.2 per cent on unauthorised halting sites. With the exception of Local Authority / Approved Housing Bodies (AHB) accommodation, and accommodation provided from within their own resources, the number of Traveller households accommodated decreased in each of the remaining accommodation types.⁸

For clarification, the Central Statistics Office define a private household as made up of ‘either one person living alone or a group of people (not necessarily related) living at the same address with common house-keeping arrangements - that is, sharing at least one meal a day or sharing a living room or sitting room. In order to be included in the household, a person had to be a usual resident at the time of the census’.

⁵ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/276539/9248d855-1f03-42c3-be31-def188fdf7a8.pdf#page=null> Accessed 28 June 2024

⁶ <https://assets.gov.ie/130911/fe93e24e-dfe0-40ff-9934-def2b44b7b52.pdf> Accessed September 2023

⁷ <https://itmtrav.ie/our-work/accommodation/> Accessed 15 September 2023.

⁸ <https://www.socialjustice.ie/system/files/file-uploads/2023-05/Social%20Justice%20Matters%202023%20WEB%20Version.pdf> Page 144 Accessed 15 September 2023.

Importantly, it is worth noting that the CSO define ‘a permanent private household as a private household occupying a permanent dwelling such as a house, flat or bed-sit. A temporary private household is a private household occupying a caravan, mobile home or other temporary dwelling.’⁹

The CSO report that on the night of the Census in 2022, in the section called ‘Irish Travellers usually resident and present in the State’ there were 418 individuals, 189 male and 229 females who identified as Travellers in Sligo. However, when the Census reports on “Irish Travellers living in private households by type of household”, there are only 372 individuals listed. 338 live in permanent private housing and 34 live in temporary private housing. The difference may be accounted for if Travellers are living in a congregated setting such as a hospital, refuge or emergency homelessness accommodation.

Traveller households also had an average size of 4 persons per household compared to 2.7 for the total population. In Sligo, the average is just over at 4.25. In general, Traveller families tend to be larger than the overall population which needs to be factored in when planning ahead. Larger 5 bedroom homes would be more appropriate to meet the specific needs of families. These family homes need to be situated close to services such as transport links, schools, shops and G.P.s. The need for larger homes is identified by Pavee Point as key challenge for Travellers trying to exit homeless services, as well as the overall lack of suitable housing.

Expert Review

In July 2019, the results of the Traveller Accommodation Expert Review were published.¹⁰ In this Report, the Expert Review Group identified as a “fundamental problem”, the lack of a strong evidence base for policy making. The direction of housing policy generally, whereby social housing is now provided by way of the private sector, also presents particular difficulties for Travellers as they face “strong barriers” in accessing private rented accommodation. The Report concludes with a series of recommendations on all aspects of Traveller accommodation provision, from delivery suitable to the need; to planning; capacity and resources; and governance.

In its Programme Board Update¹¹ published in May 2024, the Expert Group, as part of the ongoing work programmes, noted that more detailed data is needed on Travellers who are not included in the Social Housing Needs Assessment and also on future Traveller accommodation need in order that effective planning can take place for Traveller accommodation provision. Also of note, the update reports that more information on Travellers currently accommodated in Rental Accommodation Scheme (RAS), Housing Assistance Payment (HAP) scheme and Rent Supplement funded dwellings is needed. To accomplish this, “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)” will be required.

The update recommends “research on good practice in the planning, design, management and maintenance of halting sites should be commissioned which takes account of changes in caravan design and size, and Travellers’ needs and household size. On the basis of this research and also consultation with Travellers and social landlords, up-to date guidelines on the planning, design, management and maintenance of Traveller-specific accommodation be issued”.

⁹ <https://www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/background-notes/>

¹⁰ <https://www.paveepoint.ie/wp-content/uploads/2019/07/Expert-Review-Group-Traveller-Accommodation.pdf>
Accessed 18 September 2023.

¹¹ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/297444/73b5b5d0-b82c-4d73-810c-40126cadf6da.pdf#page=null>
Accessed 15 July 2024.

These are all very welcome, however there are a significant number of actions that have yet to be progressed, with some reviewed as “Future Work Programme” within the Expert Group’s review.

One of the major ones is to “provide comprehensive planning guidelines for Regional Assemblies and local authorities to ensure consistency and integration of the Traveller Accommodation Programme and the Housing Strategy section of Development Plan preparation and development management processes”.

The reported conditions experienced by Traveller families, that of increased overcrowding, discrimination within the private rented sector, greater risk of homelessness, and associated health and mental health difficulties warrants that this issue be treated as an emergency and that local authorities be compelled to utilise the increased funding available to ensure that Traveller families and their children are supported to live with dignity.

Section D.3 of the Expert Review recommends establishing Traveller Accommodation Strategic Policy Committees (TASPC) in place of the Local Traveller Accommodation Consultative Committees (LTACCs). Unlike other Strategic Policy Committees (SPCs), this would have a decision-making role as well as an advisory role. They also recommend that this TASPC should be linked with the Housing SPC through a traveller representative who sits on both committees.¹²

Irish Human Rights and Equality Commission (IHREC) Accounts

In July 2021, the Irish Human Rights and Equality Commission (IHREC) published accounts of the first Council-by-Council equality review on Traveller Accommodation in the history of the State. The recommendations made in the ‘Equality Review carried out by Sligo County Council in respect of Traveller-specific accommodation’¹³ are as follows:

1. Address the policy and procedure for:

- conducting research on Traveller preferences in the county in relation to accommodation type, the change evident in these and the factors involved in such change, and the implications for future provision;
- presenting data, in the Traveller Action Plans (TAPs) and progress reports, in particular: providing a breakdown, providing information on accommodation needs and preferences and how these are being addressed;
- recognising and establishing the practical implications of Traveller ethnicity and ensuring a respect for Traveller culture and identity in the provision of housing and accommodation services to Travellers;
- establishing tracking and independently verifying the preferences of the Traveller community in relation to type of accommodation;
- responding to the practical implications of Traveller ethnicity, in the provision of standard housing, in particular for supporting and sustaining integrated diverse communities;
- tracking the experiences of the Traveller community in seeking to secure accommodation in the private rented sector and addressing the issues identified;
- developing culturally specific responses to the needs of Travellers experiencing homelessness;
- establishing and developing a response to the needs of Travellers who are nomadic within and through the county through the provision of transient halting site bays;
- establishing appropriate structures, processes, and supports for Traveller tenant participation in estate

¹² Ibid p24.

¹³ https://www.ihrec.ie/app/uploads/2022/08/Sligo-CC-Equality-Review-IHREC_Final.pdf Accessed 18 September 2023.

- identifying and responding to the imperative of an informed and empowered participation by Travellers on the Local Traveller Accommodation Consultative Committee (LTACC) through relationship building, and capacity-building or support for representatives; and

- implementing the Public Sector Equality and Human Rights Duty in the next review of the TAP.

2. Establish and implement an ethnicity identifier in data gathering and analysis in relation to the provision of social housing and homelessness services and include all Traveller-specific accommodation options in housing applications (i.e. allow applicants identify themselves as a member of the Traveller community if they wish and for the sole purpose of identifying accommodation needs and include a list of needs/preferences any or all of which may be ticked, including, but not limited to permanent/transient halting site, group housing, outdoor space for dogs/horses and preference to be accommodated close to family members).

3. Develop a more transparent recording of the methodology of collection and data obtained in the annual count of members of the Traveller community (for example by survey, setting out the steps taken to ensure all members of the Traveller community were reached and including such questions as multiple accommodation preferences and difficulties in accessing such preferences or other accommodation in the past).

4. Engage the services of an appropriate independent body, to draft a report on the reasons why the Traveller representative members of the LTACC felt the need to resign in 2018 and, if necessary, possible steps that could be taken to ensure that Traveller representatives on this committee in the future had a voice that was listened to and respected. Any such steps taken by the Council should be published.

5. Engage the services of an appropriate independent body, to draft a report on what concerns the residents of the Ballyfree halting site and the Glenview Ash Lane refurbished welfare units site had with regard to proposed developments on these sites and what steps could be taken to meet the accommodation preferences of these residents. Any such steps taken by the Council should be published.

6. Record data on both funds allocated and drawn down for Traveller-specific accommodation and those for general accommodation. This would help to inform the Council to ensure that there is no less favourable treatment of Travellers in the provision of accommodation. Account may be taken of the true preferences of members of the Traveller community whose accommodation needs are met through general housing funds and of the fact that some forms of accommodation are more expensive than others.

7. Assess over the coming years whether the new procedures set out in Circular 03/2020 of the DHPLG improve its rate of drawdown for Traveller-specific accommodation. If no improvement is evident at that point, the Council should commission an independent report into the reasons for this and follow any recommendations made.

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

Nationally, the review found that, between 2008 and 2018, of the €168.8 million allocated to local authorities for Traveller-specific accommodation, just two thirds (€110.6 million) was drawn down. In 2020, the Department of Housing, Local Government and Heritage ceased the practice of allocating specific budgets to individual Local Authorities and implemented a new allocation process following a review of arrangements for the disbursement of funding provision and related supports for Traveller specific accommodation. Since then, Local Authorities can apply for and draw down funds throughout the year. While the table of draw downs provided in response to a Parliamentary Question raised by Deputy Róisín Shortall TD in September 2022 has the names of the Local Authorities concerned redacted, it would appear that while the full central allocation was drawn down in both 2020 and 2021, the funding was not drawn down by every Local Authority.¹⁴

The primary issue relating to the lack of suitable Traveller accommodation is not that funding is not being made available, as is the case in other areas of housing policy, but (apart from 2020) that this funding is not being utilised by the Local Authorities tasked with providing this accommodation. Stakeholder reviews have been undertaken to identify the type of accommodation most suitable and preferable for Travellers, however it is the ‘implementation gap’ identified in a 2018 Oireachtas Spotlight report¹⁵ that is creating the barrier. This would involve expediting the many areas outlined by the Expert Group in its recent Progress Report and could extend to the development of a specific Traveller Accommodation Strategy, such as that published in Northern Ireland.¹⁶ Indeed, an All Island approach is proposed by Pavee Point who ask that the State ‘explore with the Northern Ireland Housing Executive (NIHE) the feasibility of an all island approach to the provision of a network of Transient Sites across the island of Ireland’.¹⁷

As with other areas of housing policy, realistic targets should be developed for local authorities to provide Traveller families with safe, suitable accommodation. Discrimination and bias must be challenged and sanctions imposed on Local Authorities who do not access funding to meet developed targets.

Traveller Homelessness

Pavee Point Traveller and Roma Centre (Pavee Point) “presented to the Joint Oireachtas Committee on Housing and Homelessness and at this forum... highlighted that although representing less than 1% of the population, Travellers constitute a disproportionate number of those experiencing homelessness in Ireland. In spite of this, Travellers are invisible within all national policy frameworks and government responses related to homelessness”.¹⁸

Pavee Point see a heightened risk of homelessness for Travellers stemming from systemic issues such as the “lack of culturally appropriate accommodation and lack of accommodation for larger family sizes as some of the reasons as to the disproportionate numbers of Travellers experiencing homelessness”.¹⁹

¹⁴ <https://www.oireachtas.ie/en/debates/question/2022-09-15/212/> Accessed 18 September 2023.

¹⁵ https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2018/2018-10-01_spotlight-traveller-accommodation-the-challenges-of-policy-implementation_en.pdf Accessed 18 September 2023.

¹⁶ <https://www.nihe.gov.uk/getattachment/345ec500-7434-4e6d-befb-07af04dd0595/Irish-Travellers-Accommod> Accessed 18 September 2023.

¹⁷ <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf>

¹⁸ https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/committee_on_housing_and_homelessness/submissions/2016/2016-05-19_opening-statement-pavee-point_en.pdf Accessed 18 September 2023.

¹⁹ <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf> Accessed 4 July 2024

Travellers are impacted by racism then when trying to access housing within the private rental sector. In 2018, the Irish Human Rights and Equality Commission (IRHEC) reported “that Travellers experienced the highest levels of racism and discrimination in relation to accommodation, with Travellers almost ten times as likely to report discrimination in access to housing as the general population”.²⁰ The Housing Agency also found that “Travellers in the Private Rented Sector, even where private rented accommodation exists, the overwhelming majority of landlords (82%), would not rent to Travellers, despite the Equal Status Act, under which it is illegal to discriminate against Travellers in accommodation”.²¹

Overcrowding – Hidden Homelessness

According to ‘A report investigating the causes and impact of Traveller Homelessness and Hidden Homelessness in the Region’²² from the Cork and Kerry Regional Traveller Accommodation Working Group (RTAWG), the criminalisation of Nomadism is a factor of overcrowding for Traveller households. They note that “Section 24 makes stopping on both public and private lands to be a criminal offence.....(and) as a result, many end up staying in family bays and where possible, bringing another trailer or caravan into the bay. A direct consequence of this is that many halting sites are severely overcrowded and in breach of fire and safety regulations as set out by the Department of Housing and the Environment, however, when there is nowhere else to go, many feel that they have no other option”.

Census 2016 reports that 39 per cent of Travellers live in severe overcrowding compared to 6 per cent of the general population.²³ In 2019, 9 per cent of Traveller families nationally were doubling or trebling up with other families.²⁴

Another fault line is that we currently have an over reliance on the private sector to meet the country’s social housing need and findings noted above show that 82% of landlords would not rent to Travellers.²⁵

The figures underestimate the true level of need as only those accessing local authority homeless accommodation services are counted in the national figures. If the ETHOS (European Typology on Homelessness and Housing Exclusion) produced by FEANSTA (European Federation of National Organisations Working with the Homeless) was used, a more accurate picture could emerge. This method counts those who are roofless (without a shelter of any kind, sleeping rough), the houseless (with a place to sleep but temporary in institutions or shelter), anyone living in insecure housing (threatened with severe exclusion due to insecure tenancies, eviction, domestic violence) and those living in inadequate housing (in caravans on illegal campsites, in unfit housing, in extreme overcrowding).²⁶

²⁰ <https://www.ihrec.ie/app/uploads/2022/08/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf> Accessed 4 July 2024

²¹ https://www.housingagency.ie/sites/default/files/23.%20Experiences-of-Travellers-in-the-Private-Rented-Sector_1.pdf

Accessed 4 July 2024

²² http://tvgcork.ie/sites/default/files/downloadableResources/RTAWG-Conference-Launch-Traveller-Homelessness-in-the-South-West-180122_0.pdf Accessed 20 September 2023.

²³ https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/committee_on_housing_and_homelessness/submissions/2016/2016-05-19_opening-statement-pavee-point_en.pdf Accessed 18 September 2023.

²⁴ <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf> Accessed 3 July 2024

²⁵ <https://www.ihrec.ie/app/uploads/2017/11/Who-experiences-discrimination-in-Ireland-Report.pdf> Accessed 18 September 2023.

²⁶ <https://www.feantsa.org/en/toolkit/2005/04/01/ethos-typology-on-homelessness-and-housing-exclusion> Accessed 3 July 2024

In 2019, a European Commission report referred to the current state of data collection on homelessness in Ireland as “statistical obfuscation if not ‘corruption’”.

A 2021 paper from Pavee Point, ‘The Traveller Community and Homelessness’ notes that in their research “approximately 39 per cent of Travellers meet the European definition of homelessness (ETHOS) as this includes the large number of Travellers who are experiencing ‘hidden homelessness’ in overcrowded living conditions. This is compared to 6% of the general population.”²⁷

Homelessness and Gender

Figures from Focus Ireland show that in general more men than women enter homelessness.²⁸ However, they note that lone mothers are over represented in homelessness and that “homelessness has a particular effect on Traveller women and girls, including an impact on overall health and well-being. Traveller women and girls are one of the most marginalised groups in Irish society and their experiences of homelessness differs to that of the majority population or other minority groups”. They also report that many Traveller women experience “fear and mistrust in mainstream services due to past experiences of negative and/or discriminatory treatment, lack of information and awareness about services, literacy barriers, child protection fears that their children will be taken away following presentation to services and so forth. This often results in Traveller women living in hidden homelessness or only coming into contact with services when they are already experiencing multiple and complex needs”.²⁹

Policy Initiatives

Traveller Specific/Culturally Appropriate Accommodation

According to the Irish Traveller Movement, “on the basis of their culture, many (but not all) Travellers today prefer to live in what is called “culturally appropriate” or “Traveller Specific” accommodation – namely halting sites or group housing schemes where large extended families live together based on Travellers’ shared identity”.³⁰

The Cork & Kerry Regional Traveller Accommodation Working Group (RTAWG) “stresses that there needs to be a culturally appropriate response for Traveller homelessness, along with a dedicated budget. While the needs of Travellers to culturally appropriate accommodation are recognised both nationally and internationally, this has not been realised within homelessness policy or provision of emergency accommodation. Despite State recognition of the damaging and unsustainable effects upon individuals and families, Travellers, officially considered to be homeless, must access generic supports. The RTAWG therefore recommends that each local authority must, as a matter of urgency and in recognition of their human rights duties and the unique cultural needs of Travellers, adopt appropriate policies and practices regarding Traveller homelessness. Such actions could include family-specific hubs complete with family supports, serviced halting sites for temporary..... It could also include a toleration policy of caravans/mobiles in relative’s yards, allied with the provision of appropriate supports and inter-agency co-operation (irrespective of whether the yards are in public or private ownership).”³¹

²⁷ <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf> Accessed 3 July 2024

²⁸ <https://www.focusireland.ie/wp-content/uploads/2021/10/Focus-on-Homelessness-Gender-2021.pdf> Accessed 3 July 2024

²⁹ <https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Traveller-Homelessness-Advocacy-Paper-Oct2021.pdf> Accessed 3 July 2024

³⁰ <https://itmtrav.ie/our-work/accommodation/accommodation-key-issues/> Accessed 29 September 2023.

³¹ http://tvgcork.ie/sites/default/files/downloadableResources/RTAWG-Conference-Launch-Traveller-Homelessness-in-the-South-West-180122_0.pdf Accessed 29 September 2023

The Housing (Traveller Accommodation) Act 1998³² places a requirement on each local authority, on foot of a consultation process (this part is essential), to prepare and adopt and then implement five year rolling accommodation programmes to meet both the existing and projected accommodation needs of Travellers in their areas. These programmes in turn then provide a road map for Local Authority investment priorities over the five year term. They also provide the basis for the allocation of funding from the Department of Housing, Local Government and Heritage.

The Department of Housing, Local Government and Heritage state that “accommodation for Travellers is provided across a range of options and it is open to Travellers to opt for any form of accommodation. These include:

- standard local authority housing, which is financed from the Department’s capital allocations for social housing
- private rented accommodation
- private housing assisted by local authorities or voluntary organisations
- Traveller-specific accommodation which receives 100% capital funding from the Department.
- Traveller-specific accommodation includes group housing schemes and halting sites.³³

Consultation is the vital part of ensuring that genuinely Traveller specific, culturally appropriate accommodation is provided for the community. The Traveller Accommodation Expert Review Group³⁴ recommends that “ Local Traveller Accommodation Consultative Committees (LTACCs) should be replaced with Traveller Accommodation Strategic Policy Committees (TASPCs). Like all other local authority strategic policy committees (SPCs), the TASPC would be made up of elected members but it would also include Traveller representatives. The TASPC would have a decision-making role as well as an advisory role and would feed into the development of the housing strategy by being integrated into the Housing SPC. The two SPCs would be linked through a Traveller representative on the TASPC sitting on the Housing SPC.” The Thematic Housing Group notes that at a national level there seem to be unreasonable delays implementing the TASPCs (at time of writing, we are 6 years on from this recommendation). As 2024 is the year for implementing the new Traveller Action Plan, Sligo Traveller Support Group should have seat on SPC1: Housing and Corporate beginning in the 2024 term. It is the opinion of the Thematic Housing Network that STSG should have a dedicated seat on SPC1 (or the equivalent subject to the current review of the SPC scheme in Sligo)

Caravan Loan Scheme for Traveller families

The pilot Caravan Loan scheme was introduced under Section 25 of the Traveller Accommodation Act 1998 in order to support the provision of Traveller-specific accommodation. Importantly, it remains a commitment in Housing for All, the government’s housing plan to 2030. The Caravan Loan Scheme is considered a Social Housing Support and as such means that the social housing housing needs of the household have been met under the scheme. However, similar to those in receipt of other social housing supports such as Housing Assistance Payment (HAP) or the Rental Accommodation Scheme (RAS), the household can request or ensure that they are still included on the local authorities housing list, usually on the transfer list.

³² <https://www.irishstatutebook.ie/eli/1998/act/33/enacted/en/html> Accessed 29 September 2023

³³ <https://www.gov.ie/en/service/9c812-traveller-accommodation/#:~:text=Accommodation%20for%20Travellers%20is%20provided,private%20rented%20accommodation> Accessed 29 September 2023.

³⁴ <https://www.pavepoint.ie/wp-content/uploads/2023/08/Expert-Review-Group-Traveller-Accommodation.pdf> Accessed 15 July 2024.

The purpose of the scheme is to enable local authorities to provide loans directly to Travellers so they can purchase their own caravans or mobile homes for use as their primary residence on halting sites at a preferential rate. Under the pilot scheme, there was provision for up to 75 caravans or €3 million expenditure, nationwide until the end of 2022. To date there has been a high uptake of the scheme, with the full expenditure of almost €27 million by local authorities relating to Traveller-specific accommodation in 2022. This represents a full spend of the budget allocation for the third year in a row.

In reality it has proven to be extremely difficult to purchase safe, well insulated, modern caravans designed for all year family living for the monies available. A fuel poverty study by National Traveller MABS (Money Advice and Budgeting Service) found that;

- Travellers living in mobile homes or trailers are nine times more likely to go without heat than the general population.
- Travellers living in mobile homes are fourteen times more likely to be unable to keep their household warm than the general population.
- Travellers living in mobile homes spend on average between 26.1% (median) and 28% (mean) of their income on energy this is around five to six times higher than the corresponding figure of 4.6% of the population.
- 80% of this group experienced condensation in their home and 84.6% experienced damp.
- 77% of Traveller households are in energy poverty, and the average weekly spend on energy costs among this group is €108.

Well heated and ventilated homes are essential for health and wellbeing. It must also be a matter of urgent policy to ensure that the costs related to keeping the home warm don't push families into poverty. Census 2022 reports that 4 per cent of Irish Travellers report their health as bad or very bad. This is twice as high as the proportion of the total population who reported their health as bad or very bad (2 per cent).³⁵

Cena - Culturally Appropriate Homes Limited

Cena are a Traveller led Voluntary Accommodation Association. The "name CENA is the translation of the cant term (Traveller Language) for home.....(and) the objectives of CENA are informed by the vision of an Ireland where all Travellers are accommodated in culturally appropriate accommodation that meets their needs and also fulfils Travellers right to a home within a sustainable community setting of their choice."³⁶

Cena are a member of the Irish Council for Social Housing and can be contacted at Dublin City Council, 4-5 Eustace Street, Temple Bar, Dublin 2.

The Sligo Traveller Support Group, in their submission to the Sligo County Development Plan asked that CENA be added to the list of approved housing bodies.

³⁷

"The following is the position regarding the Traveller Community in Ireland:

³⁵<https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/> Accessed 4 July 2024

³⁶<https://www.wicklow.ie/Portals/0/CENA's%20submission%20regarding%20TAP.pdf> Accessed 29 September 2023.

³⁷ At the time of writing (June 2024) a public consultation underway on the development of a Revised National Traveller & Roma Inclusion Strategy in Ireland.

1. Legislation is in place to assist Traveller Families meet their housing requirements

The Housing (Traveller Accommodation) Act 1998 provides the legislative framework within which housing authorities meet the accommodation needs of Travellers. The Act represents a planned, integrated and comprehensive response to the accommodation needs of Traveller families in need of accommodation. The provisions of the Act provide for public input and consultation at all stages of the preparation and implementation of Traveller Accommodation Programmes.

2. National Traveller Accommodation Consultative Committee (NTACC)

The National Traveller Accommodation Consultative Committee (NTACC) was established on a statutory basis in April 1999 under the provisions of the Housing (Traveller Accommodation) Act, 1998 to advise the Minister for the Environment, Community & Local Government on Traveller accommodation issues. The term of office of the members of the fifth National Traveller Accommodation Consultative Committee (NTACC) will run until September 2016. The seventh NTACC was appointed on 9th January 2020 for a three-year term, in accordance with sections 19 and 20 of the Housing (Traveller Accommodation) Act 1998.

3. Funding

The Department of the Environment, Community & Local Government provides 100% of the capital cost for Traveller specific accommodation and services for Irish Travellers, including

- constructing, redeveloping and refurbishing serviced permanent residential caravan parks;
- providing temporary and transient residential caravan parks;
- constructing and refurbishing group housing schemes;
- constructing / acquiring housing for Travellers in certain circumstances.

Irish Traveller families are also accommodated in local authority social housing dwellings, which are funded through the main local authority social housing programmes. The vast majority of Irish Traveller families are accommodated in mainstream housing (standard social housing, private rented accommodation, private houses assisted by local authorities, and housing funded from their own resources) in line with preferences expressed under the housing needs assessment process. Again, consultation with community is key to ensuring that the accommodation that ends up being financed meets the needs of that community.

The Department of Environment, Community and Local Government also finances the recoupment of Social Workers and Caretakers salaries along with management and maintenance cost for Traveller-specific accommodation each year. In addition, the Department provides for:

- recoupment to local authorities of 50% of the cost of providing caravans to Travellers in emergency cases;
- recoupment to local authorities of a special grant of €3,810 payable to Travellers for the first time purchase of a house;
- recoupment to local authorities of a special grant of 10% of the cost up to a maximum of €640 to a Traveller family who are purchasing a caravan for the first time.”³⁸

The Report of the Housing Commission

The recently published³⁹ Report of the Housing Commission³⁹ states that “The Commission has studied the challenges in the housing system in detail. We are confident that if the recommendations provided in this

³⁸ <https://www.travellerinclusion.ie/website/TravPolicy/travinclusionweb.nsf/page/accommodation-en> Accessed 29 September 2023.

³⁹ <https://www.gov.ie/en/publication/f3551-report-of-the-housing-commission/> Accessed 5 July 2024

report are implemented, this would create a housing system that is sustainable in the long-term”. As part of Recommendation #73 which is to ensure that appropriate Traveller-specific accommodation is delivered, they recommend that Government:

- Implement Recommendation B2 of the Traveller Accommodation Expert Review: ‘Put in place the legislative provisions to suspend the reserved function of elected members for approval of Part 8 proposals for Traveller accommodation, and also to suspend the reserved function relating to the agreement to dispose of land for the purposes of developing Traveller accommodation and provide these as executive functions. This suspension should be reviewed after five years.’
- Implement Recommendation D1 of the Traveller Accommodation Expert Review: ‘Establish a National Traveller Accommodation Authority that would oversee the implementation of policy on the provision of accommodation for Travellers and of appropriate funding and staff to enable the authority to fulfil its functions.’
- Ensure that the size of new social housing more closely reflects the size of homeless households and those on the social housing waiting list. This would help to address the high levels of homelessness among Traveller families. The Expert Group reported that, due to their relatively large size, many Traveller families had difficulty in securing suitable HAP-funded accommodation and suitable social housing. For this reason, Traveller families are over-represented in emergency accommodation for homeless people and tend to remain longer in this accommodation than smaller households.
- Expand the numbers of community liaison officers employed by local authorities to work with Travellers. These staff could take responsibility for some of the support services formerly provided by the local authority social workers to this community.

To that last point, the report states that whilst “Travellers should have equitable access to the local authority social-work services based on need in the same way as any other clients, but they should not be obliged to use this service. Current arrangements for the automatic referral of Travellers to a dedicated Traveller social worker based on their ethnicity should be discontinued.”

More generally, the Housing Commission recommends that any proposed National Housing Conditions Survey in Ireland should also “include the preferred housing options of all individuals”. This would be of real benefit to the gathering of accurate data on the ACTUAL preferred housing options as opposed to only being able to access what limited options may be currently available.

They also “regard it as essential that a comprehensive survey of housing conditions in Ireland be undertaken. This should be a nationwide survey covering all housing types and tenures. The fact that such a survey has not been undertaken since 2000-2001 is a strong justification for doing so. Ireland’s housing system has undergone an extraordinary boom-bust cycle since the last national housing condition survey was undertaken, and regulatory standards have changed substantially over the past two decades. A particular concern is the condition of dwellings which may have been built to lower regulatory standards and may have deteriorated. Key issues to consider are:

- Ventilation, damp and mould
- Safety of electricity and gas systems
- Adequacy of heating and heat retention standards
- Adequacy of lighting
- Access to essential facilities such as for cooking or washing clothes, and bathroom facilities”.

Conclusion

Local authorities across the country must publish a development plan which dictates how land can be developed. They have to provide sufficient zoned land in that development plan to meet the housing requirements set out in their Housing Supply Targets (HSTs). In turn, the Office of the Planning Regulator (OPR) has to assess the plans to ensure the local authority complies with the regulations. These local area development plans set out the core goals and work to ensure that sufficient land is zoned and serviced to cater for future housing demand over the plan period. In order for local authorities to fully deliver on this aim, they must consult and co-design from the very earliest stage with the communities they serve. Any consultation must be incorporated into the core timelines of the plan and must be conducted in a way appropriate to, and directed by, the target audience, in this case the Traveller Community. Traveller families face challenges and barriers at every move and if they are to overcome them, secure, safe, affordable, acceptable, appropriate housing is fundamental.

The opening page of the report of the Joint Committee on Key Issues Affecting the Traveller Community begins with the following statements, ‘The Committee was struck by the resilience of the Traveller community in the face of decades of deprivation, poverty and discrimination.’ and ‘The Committee believes that the State has a duty to give people every opportunity to reach their full potential in every area of their lives’.⁴⁰

The key to getting housing right for any community is to listen to that community and ensure that their concerns and expectations are included from the very beginning of the planning process. The Joint Committee recognises that “travellers have specific cultural considerations with regard to housing that must be taken into account, such as larger family sizes, the tradition of nomadism, the use of caravans and horsemanship. The Traveller led approved housing body Cena Culturally Appropriate Homes (Cena) is engaging with members of the Traveller community and working with architects to properly define what culturally appropriate accommodation for Travellers looks like.”⁴¹ A key recommendation is that the Sligo Traveller Support Group should have seat on SPC1:Housing and Corporate beginning in the 2024 term.

⁴⁰ https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_key_issues_affecting_the_traveller_community/reports/2021/2021-12-01_final-report-of-the-joint-committee-on-key-issues-affecting-the-traveller-community_en.pdf Accessed 3 July 2024

⁴¹ Ibid

Further Reading

Accommodation Options for Travellers

Residential Caravan Parks for Travellers

Accommodating Transient Traveller Families

Traveller Accommodation - Basic Services

Group Housing for Travellers

Pavee Point Traveller Community and Homelessness Advocacy Paper

