

Appendix 2 Submissions

- **Galway Traveller Movement**
- **Irish Traveller Movement**



Galway Traveller Movement

Submission to the Midterm Review of the Traveller Accommodation Programme
2019-2024

Date 19/05/2022

Galway Traveller Movement made two submissions in relation to the development of the Galway City Traveller Accommodation Programme 2019-2024. We welcome the opportunity to submit to the Midterm review.

The current accommodation crisis has been exacerbated further by the global COVID-19 pandemic and the recent war in Ukraine. In any accommodation crisis it is those who are most vulnerable who will suffer most in relation to access to accommodation and affordability of accommodation in relation to their income.

It is well documented that members of the Traveller community are largely discriminated in society, and this is also reflected in accessing private rented accommodation through Housing Assistance Payment (HAP). The most recent published report 'Locked out of the market' taken in March 2022 by Simon Communities of Ireland, showed that there were only 80 properties across the whole country available within standard or discretionary rates of HAP. Within those 80 properties, there was only one in Galway available for a single person within the discretionary HAP limits. Of the number of properties available for families "the majority of these occurred in Dublin", (Simon Communities of Ireland, 2022).

Since that study was conducted, Ireland has experienced a sharp increase in the cost of living. Individuals and families are struggling and those who are faced with the challenge of sourcing rented accommodation are now facing a somewhat impossible task.

Members of the Traveller community are overrepresented in homeless accommodation in Galway city and county with a snapshot of September 2019 showing that 50% of families presenting as homeless were from the Traveller community. This number will only grow further if there are not changes made to the TAP to reflect the changes which have occurred since first adopted.

The submission will make Midterm review recommendations under the TAP's various headings and highlight them in blue.

Section 1 Preparation and Consultation

The timescale and notice for the midterm review was not adequate. Issuing a call in the end of July for submissions to be made by mid-August did not allow for community /voluntary organisations and or agencies to effectively participate. This is a time when most organisations and agencies are not working at full capacity due to staff being on annual leave. GTM recognise that this was not in the control of the GCC but would like the council to give this feedback to the Department and the Traveller Accommodation Unit.

Section 2 Policy Statements

GTM welcome the inclusion of the Public Sector Duty in this section

A review of bullet point 9 is needed as the way it reads in its current form negates the obligation to meet the nomadic needs of the Traveller community. (This was also made as part of our original submission) It does not allow for provision for nomadic Traveller families. The 1998 Act requires all Local Authority areas to provide a transient site.

A review of bullet point 12 is needed in relation to the length of time allowed see point from GTM submission 2019- 6 weeks is too short, the point is too restrictive and does not show an understanding of the Traveller culture. The statement needs to read like this – Galway City council will support families who wish to travel as part of their nomadic culture. Tenants will need to notify the authority of their plans to travel.

Members of the Traveller community should not have to seek permission to pursue their cultural right to travel.

A review of bullet point 13 is needed see point from GTM submission of 2019- the statement needs to be removed as it is more an operational issue. Galway City Council needs to make a commitment to developing a functioning innovative approach to providing for families who travel instead of punitive statements. The lack of a functioning transient site is problematic as Traveller families are not welcome in existing caravan parks and most of these are only open for seasonal letting

A review of bullet point 14 is needed - see point from GTM submission 2019

Providing social housing supports will not always cater for the specific cultural needs of members of the Traveller community who are homeless. Great flexibility needs to be shown and a plan developed to identify suitable alternatives for Traveller families. Cultural issues need to be given greater consideration.

Estate Management

The development of the Estate Management strategy for Traveller specific has begun has and is welcomed.

- **As in our previous submission the strategy needs to be developed using an interagency approach. Consultation will be needed, and issues of the physical barriers, maintenance , children's play areas health and safety and CCTV cameras need to be discussed. There is a potential for serious human rights breaches in data and privacy issues.**

Section 3 – Strategy Statements

GTM is continuing to advocate for a regeneration approach to the delivery of Traveller accommodation programme

GTM believes that this could be achieved by adopting a regeneration approach to delivering on Traveller Accommodation Programme for the City. Regeneration aims to “build sustainable communities through a combination of social, educational and economic initiatives” (Dept. of Environment, Web site)

At this stage the issues are so complex we need to focus on a strategic multi-faceted approach to meet the needs of the Traveller community. There is a moral obligation on us all to work together to develop this strategy and see it through to full implementation.

It is usually up to the local authority to make the application to the Department of Environment having first identified and worked with key partners to scope out the project in advance.

GTM is convinced that a project approach with a strong interagency involvement is the only way forward to meeting the long-term accommodation needs of the Traveller community.

- **To this end GTM would like to recommend, as part of the midterm review, the setting up of a task group that would lead out on the project and develop a project proposal. There would be a need to hire a team of consultants with an expertise and track record in the delivery of social/cultural, educational and economic initiatives within a regeneration framework. There is funding available at a national level for this type of approach.**

Section 5 Assessment of Need

Information brought forward from the GTM October 2017 submission and the 2019 Submission

In the government’s independent review Local Authority representatives cite that; ‘the assessment of need is not correct in the majority of assessments, as there is little or no growth in the number of families, ie plans include the current number of Travellers, but this is insufficient due to backlogs from previous plans and the natural growth in family numbers’. Representatives also stated that ‘a shortfall in resources means that recent plans are conservative and make little provision for Traveller-specific accommodation’. It is vital that the assessment of need is developed through a participatory process with the community.

The assessment of accommodation need for Travellers should take the following into account:

- Families should be informed of all the available accommodation options including, Group Housing Schemes Halting Sites, Standard Local Authority Housing or Voluntary Housing
- Assessment of needs must include Traveller families living in Private Rented accommodation including those on the HAP and other previous schemes such as RAS and LTL. These families should be included as part of the TAP 2019-2024 as they are living in insecure circumstances on a temporary basis and are awaiting some form of permanent accommodation.
- Families currently living in standard local authority housing should be afforded the opportunity to be included in the assessment of need for other accommodation types as some families may feel that the other accommodation types were not real options when they accepted standard housing.
- Assessment of need must be future proofed and include projected housing needs of young single

¹ ¹³ RSM UK Group LLP. (2017), p. 37

Travellers who may require their own accommodation over the lifetime of the programme. In light of the fact that Travellers traditionally marry at a relatively young age we would recommend that all children over the age of 16 are included in the assessment of need for this four-year period.

- Account must be taken of the fact that Travellers experience significantly greater difficulty in accessing private accommodation than the general population. Also, as culturally appropriate accommodation is not available for Travellers to rent there is a greater urgency on the Local Authority to take proactive measures to make permanent accommodation available for Travellers.

Private Rented

There is an increasing emphasis placed on accommodation provision through the private rented sector through the Rental Accommodation Scheme (RAS), Long Term Leasing (LTL) and more recently the Housing Assistance Payment (HAP). As a result of the lack of provision and disinvestment in Traveller-specific accommodation and in publicly provided standard accommodation, many Travellers, through lack of choice, have been forced into private rented accommodation. This has been confirmed by families we have worked with as private rented is being put forward as their only option.

There are numerous issues with this emphasis on private rented accommodation. Private rented accommodation does not fulfil the Traveller community's cultural right to culturally adequate or appropriate accommodation. It has had major impacts on Travellers' cultural identity, including loss of cultural capital and intergenerational support. It does not offer security of tenure and it is not a secure option for families. Private rented accommodation is the least accessible to marginalised groups such as the Traveller community. Due to racism and discrimination Travellers experience significant barriers in accessing private rented accommodation. As a result, often families have to settle for the lowest grade private rented accommodation including accommodation with damp, mould, without a functional heating system and poor insulation. There is often overcrowding in private rented accommodation as it does not adequately accommodate large families. Many families felt they are 'without choice' in terms of private accommodation. Rental schemes such as the Housing Assistance Payment (HAP) have not been equality proofed.

A significant portion of private rented does not meet minimum standards with sub-standard accommodation being rented under HAP as no inspection is undertaken before the property is rented. Properties must be inspected in a timely manner to ensure they meet minimum standards.

- **An updated needs assessment needs to be carried out and new targets included to meet the emerging demand.**
- **Based on the information above the target to house 100 members of the Traveller community through HAP is not achievable. This needs to be reviewed and alternatives detailed.**
- **GCC needs to provide Traveller accommodation which respects the Traveller community's right to culturally appropriate accommodation.**

Recommendations as per Traveller specific accommodation location.

GTM recognise that due to COVID 19 GCC is behind in their projected delivery targets. That withstanding we believe that additional human and financial resources should be invested to get the plan back on track. The proposed targets need to be met building in emerging needs as per the annual count.

- **We need to review the Traveller families who are in homeless services and include them in targets for 2023 and 2024.**

Sites and group housing schemes assessed (in alphabetical order)

1. Carrowbrowne Temporary, Headford Road
2. Carrowbrowne Transient Site, Headford Road
3. Circular Road Halting Site
4. Clos na Choile, Ballybane
5. Cul Trá, Salthill
6. Tuam Road
7. Fana Glas, Ballybane
8. St Nicolas Park Group Housing, Doughiska
9. St Nicolas Permanaent Halting site, Doughiska

1. Carrowbrowne Temporary Site

Provision for the families on this site needs to be prioritised. There are ongoing public health issues linked with living on this site . The site needs to be closed as a matter of urgency. Galway City Council needs to communicate its plans to the families .

- **The families who are requesting culturally appropriate housing need to be offered houses that meet their specific needs in 2022 .**
- **The families who want a halting site/culturally appropriate mix need to be communicated with in the last quarter of 2022.**
- **The land needs to be identified and plans developed in consultation with the families with a view to getting started early 2023.**

2. Carrowbrowne Transient Site

Members of the Traveller community have been living on the transient for over 23 years in the most basic facilities. A meaningful consultation needs to be held with the families. This is the designated transient site but it is being used to meet the permanent needs of Traveller families. On page 9 of TAP 2019-2023 it was stated that this site would be redesignated as a permanent site , bays reduced and a plan put in place to redevelop the space.

- **A detailed plan with a timeframe for action needs to be developed in 2022.**
- **If the site is redesignated GCC need to identify provision for a new transient site.**

3. Clós na Choile, Ballybane

The Traveller families have been working with GTM and GCC with regards waste management and environmental issues. A lot of work needs to be done on site to make it welcoming.

- **A full refurbishment is needed to bring this site up to an acceptable standard .**

4. Cul Trá, Salthill

There has been no substantial progress delivered in relation to addressing the overcrowding situation and health and safety issues on the site.

- **A needs assessment needs to be carried out and an emergency allocation plan developed for the 10 families living outside the original 6 bays. The 6 bays are in immediate need of refurbishment.**

5. Fana Glas, Ballybane

GTM supports the plan to refurbish the Group housing scheme. Alternative Traveller culturally appropriate accommodation for the families in the Ballybane area needs to be sourced.

- **A plan needs to be put in place for the families living in Fana Glas in 2022.**

6. Cuil Sheoige, Tuam Road

Overcrowding and poor maintenance remains an issue on the site. There are severe structural issues on site including damp and mould. The units are in very a bad state of repair. The residents also highlighted ongoing maintenance issues which have not been resolved. Access issues with regards the barrier need attention in the interests of health and safety. A modern approach needs to be invested in re access.

- **There is a need to fully refurbish the site and extend the current units.**
- **Families need additional support with regards the Caravan Loan Scheme.**

7. St Nicholas Park Group Housing Scheme, Doughiska

Overcrowding continues to be an issue. Conditions in the houses remain substandard. The lack of proper insulation and heating is causing damp and mould which is having a negative impact on the health of the residents.

- **Full refurbishment is needed for the group housing scheme + yards.**

8. St Nicholas Permanent Halting site, Doughiska

The TAP says that the site is in moderate condition. This is no longer the case there has been ongoing structural issues on site ie poor insulation, drainage, damp and mould. The units are in very poor condition.

- The works on site need to be detailed as part of the review.
- One of the families has called for a full redevelopment of the site in consultation with all the families. This was raised as a issue at the GCC LTACC operational committee meeting in 2022 and it was recommended that it should be included for planning and development in this current TAP.
- We are asking that Bay 2 and Bay 3 be merged to meet the need of a very large family – 2 parents and 9 children ranging in age from 18 – new born. We recognise that there are competing needs from other families but believe that the family size in this instance needs priority consideration.

Children's human rights need to be prioritised with regards to the right to play, respect and dignity across all Traveller specific accommodation.



Submission on Midterm Review Traveller Accommodation Programme 2019-2024

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Founded in 1990, the Irish Traveller Movement is the national advocacy and membership platform which brings together Travellers and representative organisations to develop collective solutions on issues faced by the community to achieve greater equality for Travellers. We represent Traveller interests in national governmental, international and human rights settings. We challenge racism- individual, cultural and structural which Travellers face and promote integration and equality. We are led by our grassroots community membership, deliver expertise in shaping organisations locally and promote community leadership ensuring Travellers' voices are to the forefront of all discussions, national, local and international.

We are one of three national Traveller organisational representatives to the Ministerial appointed National Traveller Accommodation Consultative Committee and the Programme Board overseeing the Traveller Accommodation Expert Review.

Traveller accommodation national status

National Count: The latest Department of Housing, Local Government and Heritage, (DHLGH) data compiled via the local authority annual count, enumerated 11,118 Traveller families (approx. 46,695 to 58,925 people (family or household size)) throughout the 31 areas.⁽¹⁾

A low estimate* from these figures shows over 2000 families (approx. 9,000 – 11,000 people) are living in inadequate, unsafe and impermanent conditions stacked against their health, education, employment and life opportunities, well below basic human rights standards

- ☐ Of the 1,047 families living in Local Authority Halting sites, approximately only half have access to an outside cold tap, no electricity with most reliant on sharing a port aloo or outside toilet with other families.
- ☐ 468 families are living on Unauthorised sites including on roadsides, public and private lands, where some have access to a cold tap, no electricity or toilet, and approx. half have no services at all.
- ☐ Of the 2000 families in overcrowded or emergency Traveller provision, or on roadsides, 800 are sharing housing with others in unsafe accommodation designed for single family usage. The extent of this problem has been seriously neglected and likely an underestimate due to fears of being identified as unofficial tenants in some cases, with the subsequent threat of eviction.

- ❑ Almost 1,300 of these Traveller families face the threat of eviction, and a low estimate* of 500 families (or between 2,000 – 2,500 parents and children) are vulnerable every day to evictions from roadsides, public or private land.

In May 2016 the European Committee of Social Rights found Ireland to be in violation of Article 16 of the European Social Charter on 5 grounds, of

1) insufficient provision of accommodation for Travellers, 2) many Traveller sites are in an inadequate condition; 3) the Criminal Justice (Public Order) Act 1994 (as amended) that (4) the Housing (Miscellaneous Provisions) Act 1992 (as amended), provides for inadequate safeguards for Travellers threatened with eviction; and 5) evictions are carried out in practice without the necessary safeguards.

A further **European Social Rights Institute** report published in September 2021, '*Monitoring Adequate Housing in Ireland*', found that 39% of Travellers are living in overcrowded conditions and 5% lack access to basic facilities such as sewage and piped water. And the *No End in Site*² report of the Ombudsman for Children's Office (2021) also highlighted the deplorable conditions in which Traveller children are living in one of many, local authorities.

Homelessness: Travellers are also significantly and disproportionately affected by homelessness in Ireland, the full scale of the crisis cannot be counted as there is no ethnic identifier within the PASS System, and homeless Travellers are not mostly not enumerated within TAPs. Therefore, they are invisible in national data collections sets also and inadequately catered for in policy design and practice.

a) 25% of homeless children living in emergency accommodation outside of Dublin were Travellers in 2019, and 13% of homeless adults were Travellers⁽²⁾. In Galway City, Traveller families accounted for 50% of all homeless families presenting to the Authority⁽³⁾ And in Dublin City Council's current TAP 11% of homeless children were Travellers and accounted for 9% of the homeless families residing in emergency accommodation.

b) Traveller families are vulnerable to longer time spent in homelessness due to discrimination in the private rental sector and low availability of housing suitable for longer family sizes, as well as to experiences of hidden homelessness including chronic overcrowding and other forms of substandard accommodation.

A sample of two collection points of information recorded by the Irish Traveller Movement and Free Legal Aid Centre Traveller Legal Service

Irish Traveller Movement

- o Jan – Dec 2021, **170** referrals were handled by ITM related to accommodation matters, **25** of which related to **evictions**, **20** overcrowding, **42** homelessness.
- o Jan – May 2022 **65** referrals were handled, **10** of which related to **evictions**, **24** overcrowding and substandard, and **15** related to homelessness.

FLAC Traveller Legal Service

- o April 2020-December 8th, 2021 **127** Traveller referrals of these **51** on housing and accommodation and **30 evictions**,
- o Jan – May 2022 **53** Traveller referrals of these **20** related to housing and accommodation and **12 evictions**.

The TAP Midterm Review

The Midterm Review of Traveller Accommodation Programmes marks a critical opportunity to fully assess progress thus far across Programmes and amend gaps identified. The following recommendations are proposed by the Irish Traveller Movement in view of our analysis across the current Programmes and of long-term consultation and engagement at community and public service level, and engagement with recent relevant reports and research in this area.

Recommendations to Local Authorities Towards Midterm Review Process

- **Community consultation** Engage the Local Traveller Accommodation Consultative Committee and local Traveller representative groups in the midterm review process towards a shared and agreed assessment of need and target to supply.
- **Assessment of need:** Amend Traveller Accommodation Programmes which do not fully identify the prescribed data sets, targets, outputs, accommodation types, and related narrative and provide these in standardised tabular form.
- **Overreliance on HAP and RAS:** 1. Review the provision of HAP and RAS as the reliant approach and ensure discrimination is eradicated in practice by landlords and agents authorised under the Scheme and scrutinise vetting procedures and criteria. 2. Ensure quotas of housing stock are clear, identifiable and accessible to take account of Traveller family size and reduce the likelihood for exits into homelessness and emergency accommodation.
- **Map Traveller accommodation in the TAP:** 1. The Irish Traveller movement endorse the OPR's recommendation as referenced 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. 2. Map sites in the TAP for the purpose of transient provision.

Community engagement

Community consultation is a recommended best approach to comprehensively inform the TAP by way of assessing needs locally, with community organisations a central gateway for that engagement, with expert insights.

Data, Assessment of Need and Methodology

Local authorities are advised to have due regard to the matter of data and assessment as outlined in the DHLGH Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes. **Gaps identified in the national TAPs 2019-2024 on the "assessment of need" include⁽⁴⁾**

- 22 authorities plan to deliver on targets for families currently in need, while 9 had set targets lower than their assessed current need
- 5 Local authorities didn't provide targets for projected needs of Traveller families
- 3 Local authorities didn't provide delivery targets for this TAP or those achieved in the last TAP
- Relevant narrative was not included, as to how assessments were made

Overreliance on HAP and RAS -The cascading impact

The report of the Irish Human Rights and Equality Commission via equality reviews of local authority provision to Travellers – (July 14th, 2021) found *"There is a concern that some members of the Traveller community experience a lack of Traveller-specific accommodation, or are exasperated by overcrowding or poor hygiene conditions in such accommodation, and for this reason feel that they have no choice but to apply for social housing."*

A review of the current TAPs at the time of their adoption showed nationally that of the 3,060 units planned for Travellers, over 50% of provision would be through Standard Social Housing, Private Rented, using housing assistance payments such as HAP/RAS and through Approved Social Housing Bodies.

Many Traveller families cannot access Private Rented accommodation and are 22 times more likely to experience discrimination in doing so, according to Irish Human Rights and Equality Commission research. Coupled with the overburdened housing market, the lack of social housing supply and where only a very small proportion of social housing and private

rental stock consists of large dwellings which would be suitable to accommodate larger Traveller families, (The average family size is 5.3 persons) these obstacles have rendered many homeless and into emergency accommodation. (Figures as referred earlier.)

The Development of Traveller Specific Accommodation

According to the Office of the Planning Regulator OPR only four current Development Plans included maps to identify Traveller-specific accommodation and of these only one showed mapping of potential future sites. Furthermore, only four Traveller Accommodation Programmes included maps to identify Traveller-specific accommodation. The report notes; *there is an opportunity for the development plans to better draw on the TAP and include specific listed policies and objectives in relation to the following:*

- ☐ **Accommodation Requirements** – to accurately reflect the range of accommodation options available to meet the requirements for the Traveller community.
- ☐ **Location of Sites** – identification of towns, settlements and lands where Traveller accommodation exists and where it will be required/can be improved on.
- ☐ **Site Selection** - provide criteria for site selection at LAP stage e.g. amenities, infrastructure and Traveller-specific services.
- ☐ **Cultural Amenities** – reflect the other cultural amenities and needs of the Traveller community e.g. stables, community facilities/resources, and Design – set out design parameters and standards for halting sites, bays and required special provisions for Traveller specific accommodation.

The 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.”*

Proposed Checklist for Midterm Review

Consultation

- Was there engagement with the LTACC, local Traveller organisations and other stakeholders at all stages of the review process? Did the LTACC sign off on the original TAP and the midterm review?

Current need.

- 1. What is the total of units / families in need? 2. What methodology was used to assess need and is this independently verifiable?
- Current need by accommodation type; 1. as 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. 2. What methodology was used to assess Traveller these accommodation preferences, with narrative on reasons for delay or amendments. 3. Has need increased or changed since the TAP was drawn up and targets now in need of revision?

Future or projected need

- 1) What is the total number of units / families in future need by accommodation type per year and delivery planned across each type per year?
- 2) Is increased growth reflected, where need has outgrown the original assessment and are indicators of measurement detailed to support figures?

Recognising culture

1. Does the TAP identify the Council's statutory obligation under the Public Sector Duty to eliminate discrimination and promote equality? ⁽⁵⁾
2. Have the cultural needs of Travellers been considered and assessed?

Indigenous Requirement and Local Connection Rule

- 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 community

in accessing social housing, i.e. where it should be discretionary, rather than conclusive, to prevent potentially unlawful discrimination against Travellers?

Homelessness

- Are figures provided on numbers of Travellers / families in homeless accommodation?

Budget and Planning

- Are timelines, site locations, target units and budgets identified for Traveller specific accommodation projects and have progress updates on each been provided?
- 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?
- Have transient sites been assessed and planned for?

Note 1

- ☐ **Assessment of the accommodation need:** Section 6(1) of the 1998 Act, the Minister directed that relevant housing authorities for the purposes of preparing a Traveller Accommodation Programme in the functional area concerned, **assess 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 July 2019 to 30 June 2024).” (p10). And, Housing authorities are required to identify the accommodation needs of Traveller families to be met under the new programmes. This must relate to the **existing accommodation needs and the projected need that will arise during the period of the programmes** across a range of accommodation options
- ☐ Under section 10(2)(b) of the Act the Minister 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.”

Note 2: Circular 35/2018: ‘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 and Sections 21 and 22 of the Act provide that LTACCs must be in place to facilitate consultation between housing authorities and Travellers and to advise on any aspect of accommodation for Travellers. Local authorities are required to appoint such committees for the purposes set out in subsections (1) to (4) of section 21 of the Act. (DHLGH Guidelines)’

References

*Inconsistencies due to non-standardised data collection across local authorities according to type of accommodation and family number distinction i.e. family or household

1. <https://www.gov.ie/en/collection/29c76-traveller-accommodation-statistics/#2020>
2. Available at: <https://www.rte.ie/news/investigations-unit/2018/1217/1017612-travellers-in-local-authorities-data/>
3. See An account of the Equality Review carried out by Galway City Council in respect of Traveller-specific accommodation <https://www.ihrec.ie/our-work/equality-review/>
4. <https://itmttrav.ie/key-reports/>
5. <https://www.ihrec.ie/our-work/public-sector-duty/>