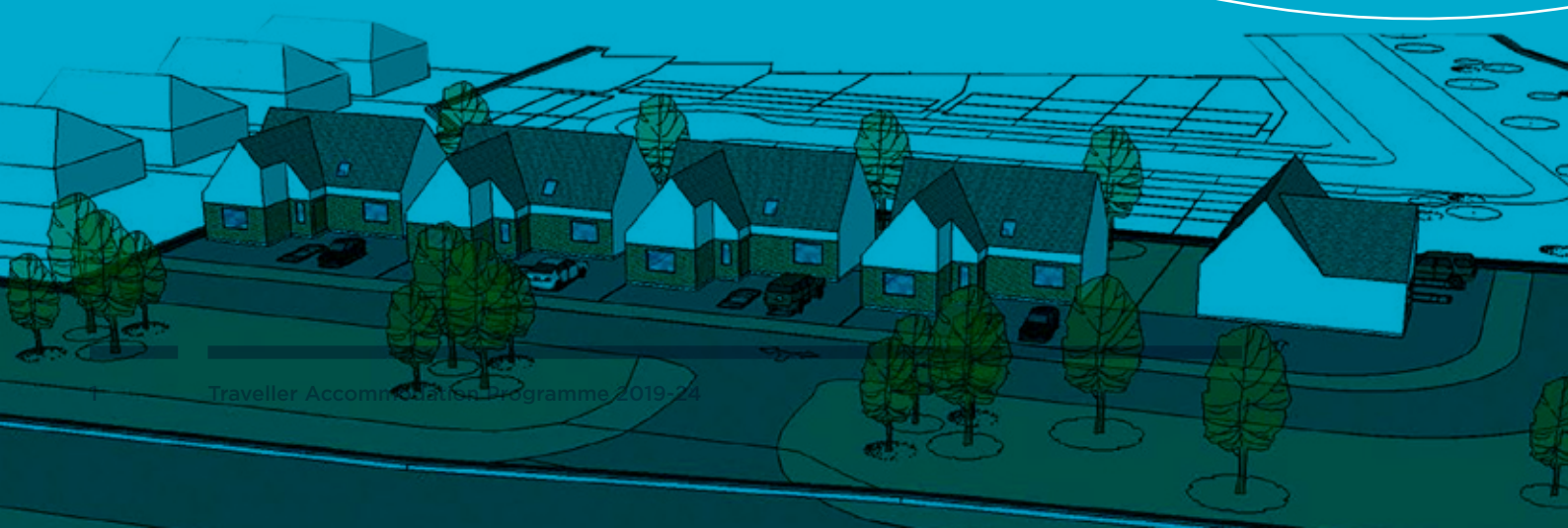
Comhairle Contae
Átha Cliath Theas
South Dublin County Council

Traveller Accommodation Programme

2019-24



Contents

Introduction	3
County Profile	4
Existing Traveller Accommodation	5
Map of Existing and Proposed sites for Traveller Accommodation 2019-2024	7
Review of the Traveller Accommodation Programme 2014-2018	8
Traveller Accommodation Programme 2019-2024	9
Assessment of Need	10
Assessment of Future Accommodation Needs	11
Policy Statement	12
Strategy Statement	13
Projected Targets and Implementation	14
Casual Vacancies	14
New Sites	15
Construction and Refurbishment Programme on Existing Sites	16
Transient Sites	17
Temporary / Emergency Sites	17
Unauthorised Sites	17
Homelessness	18
Older Person's Accommodation	18
Caravan Loans	18
Summary	19
Management and Maintenance of Developments	20

- Pre-Let Repairs
- Maintenance and Repair Service
- Fire Safety
- Anti- Social Behaviour
- Tenant Participation and Estate Management

Consultation	21
Local Traveller Accommodation Consultative Committee	21
Community/Interest Groups	21
Traveller Accommodation Unit	22
Closing Date for Submissions	22
Review of the Traveller Accommodation Programme 2019-2024	22
Appendix 1 – Submissions	23
Appendix 2 – Membership of the Local Traveller Accommodation Consultative Committee	66

Introduction

The Housing (Traveller Accommodation Act, 1998) requires South Dublin County Council to prepare and adopt a 5- year Traveller Accommodation Programme to meet the existing and projected accommodation needs of members of the indigenous Travelling Community, i.e. those families who have been resident in the county for three years prior to the adoption of South Dublin County Council's Traveller Accommodation Programme 2019-2024.

Directions for the preparation of a new Programme were issued on the 19th July 2018, by the Minister for Housing and Urban Development together with the Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes.

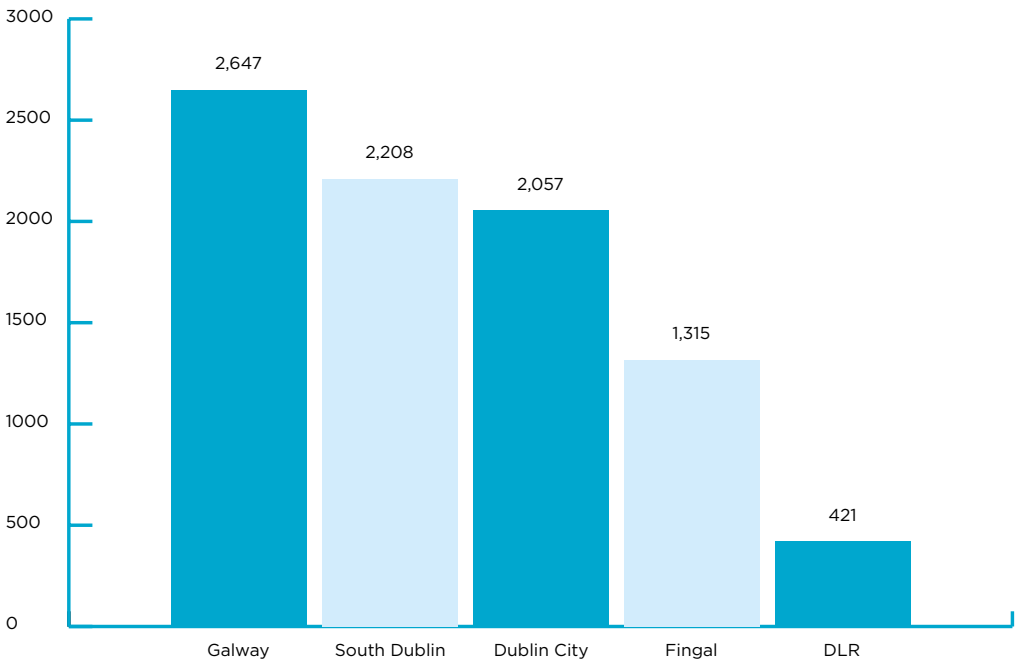
In accordance with Section 10 of the 1998 Act, the Minister has directed that the next Traveller Accommodation Programme will cover the period from the 1st July 2019 to the 30th June 2024. The Minister has specified that the latest date for the adoption of accommodation programmes is the 30th September, 2019.

County Profile

The area of South Dublin covers 222.74 square kilometres and lies about 10 miles south west of the Capital. It is bounded by the Dublin Mountains to the south and stretches from the River Liffey at Lucan through Palmerston, Clondalkin, south to Newcastle, Rathcoole and Saggart. It also includes Tallaght and stretches east to Templeogue and Rathfarnham.

The population recorded in the 2016 Census for the County was 278,749.

The number of Travellers identified in the 2016 Census in South Dublin County was 2,208. According to the 2016 Census, South Dublin has the highest Traveller population in the Dublin Region and the second highest Traveller population in the state after Galway City and County.



Existing Traveller Accommodation

The Traveller Accommodation Unit conducted a survey in November 2018 and ascertained that there are currently 279 families living in Traveller specific accommodation within South Dublin County. The breakdown of this accommodation is outlined in the table below and locations are spread across the County as outlined in the associated map.

Breakdown of Existing Traveller Specific Accommodation

Halting Sites	Bays	Group Houses	Sharing	Unauthorised
Ballyowen Lane	10	1	3	
Belgard Park	10	0	1	
Cherryfield Way	9	1	6	
Hazel Hill	5	3	2	2
Kishogue Park	10	10	3	
Lynch's Park	9	10	2	
Owendoher Haven	8	1	4	
Stocking Hill	10	0	3	
Oldcastle Park	20	0	5	
Total	**91**	**26**	**29**	**2**

Group Housing	Houses	Sharing
Coldcut Crescent	8	0
Cookstown Lane	1	0
Daletree Place	11	2
MacUilliam Gardens	10	5
Greenhills Grove	6	0
Hayden's Lane	8	2
Kimmage Manor Way	5	4
Marlfield Crescent	5	0
Oldcastle Drive	14	2
St Aidan's Close	10	3
St Mary's Close	3	0
Turnpike Lane	3	1
Tay Lane	7	0
Total	**91**	**19**

Emergency/Temporary Sites and Roadside	Bays	Sharing	Unauthorised
Fonthill Road	4	0	
Lock Road	6	4	
Lynch's Lane, Emergency Site	3	0	1
Whitestown Way	2	1	
Total	**15**	**5**	**1**

279 families living in Traveller Specific Accommodation

117 families living in group housing

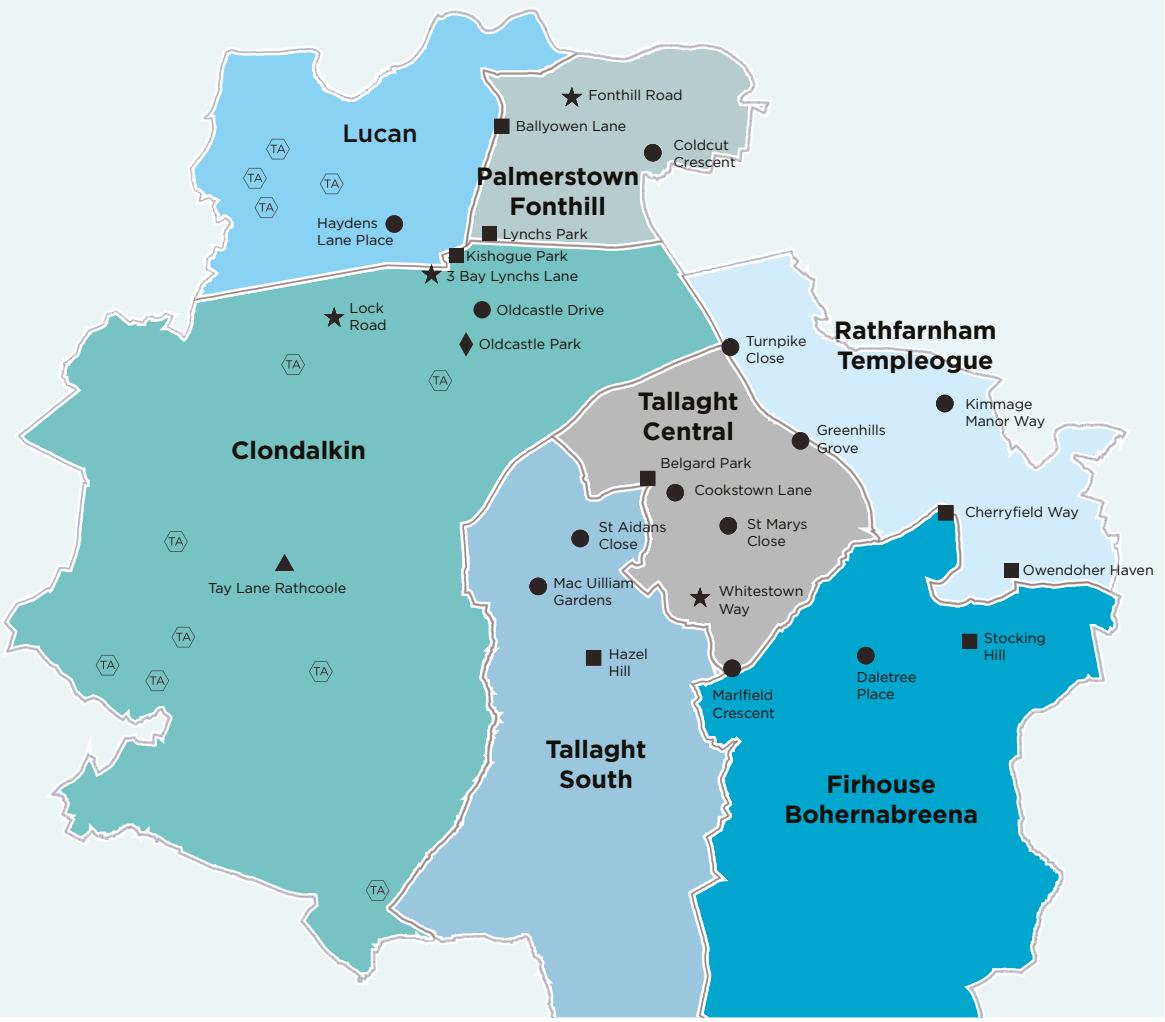
91 families living in halting sites

53 families sharing accommodation

15 families in temporary bays

3 families unauthorised on sites

Map of Existing and Proposed/Indicative sites for Traveller Accommodation 2019-2024



Legend

- ● Group Housing
- ▲ Voluntary Housing
- ■ Permanent Halting Site
- ♦ Temporary Site
- ★ Emergency Site
- (TA) Proposed sites identified to provide Traveller Accommodation as per the County Development Plan, Adamstown SDZ and new location for replacement Emergency Site.
- ▭ Local Electoral Areas
- ▭ County Boundary

* Please note that this is an Indicative Map and not to scale.

Review of the Traveller Accommodation Programme 2014-2018

The Traveller Accommodation Programme 2014-2018, projected that the following accommodation would be required during the period of the programme to meet existing and projected accommodation needs including provision for new family formation and migration.

Accommodation Type	Projected Need	No. of Families Accommodated
Traveller Group Housing	35	28
Traveller Bays	61	42
Standard Social Housing	70	74*
Total	**166**	**144**

*74 confirmed allocations to Traveller Families

New Traveller specific accommodation delivered 2014-2018

- St. Mary's Belgard Road, Tallaght- Construction and development of group housing site providing 3 homes
- St. Aidan's Brookfield, Tallaght- Construction and development of group housing site providing 5 homes

Refurbished / Upgraded accommodation 2014-2018

- 2 units at Ballyowen Lane, Lucan, Co. Dublin.
- 6 units upgraded at Lock Road, Lucan, Co. Dublin.

During the period of the last Traveller Accommodation Programme 2014-2018, South Dublin County Council spent approximately €2.2million on Traveller Specific Accommodation.

87% of Accommodation Target Delivered

2.2 million Traveller Specific Accommodation

Traveller Accommodation Programme 2019-2024

The Housing (Traveller Accommodation Act) 1998, requires Local Authorities to carry out an assessment of the accommodation needs of the Traveller families for whom accommodation will be required during the period of the programme. Notice of the assessment was sent to the relevant statutory bodies, i.e. members of the Housing Strategic Policy Committee, the Local Traveller Accommodation Consultative Committee (LTACC), the Irish Traveller Movement, Clondalkin and Tallaght Traveller Development Groups and the Health Service Executive (HSE).

A survey of the Traveller Families living in the County was carried out in November 2018. The assessment covered both the existing needs and future projected needs over the lifetime of the programme. A range of accommodation options were offered i.e. standard and group housing, halting and transient sites.

Assessment of Need

471 Traveller Families took part in the survey and are resident in the County in various forms of accommodation including standard housing, group housing, halting sites, temporary/emergency sites, unofficial sites/roadside, private rented and homeless/ emergency accommodation.

Accommodation Type	No. of Families
Group Housing	117
Halting Site Bay	91
Standard Social Housing	15
HAP/RAS	11
Temporary/Emergency Sites	15
Sharing Accommodation	49
Private Rented/Homeless/Voluntary	144
Housing Provided by Own Resources	25
Roadside/Unauthorised	4
Total	**471**

The assessment showed that there are a total of 279 families living in Traveller Specific Accommodation in the County of which 208 families have permanent accommodation and 19 families living in temporary/emergency halting sites. There are currently 49 families sharing accommodation and 3 families are living unauthorised on sites and 1 family on the roadside.

The assessment identified that 82 individuals will reach 18 years of age on or before the end of 2024, which could potentially result in the need for up to 41 additional Traveller Accommodation Units during the term of the programme for future family formations. However, South Dublin County Council's priority must remain focused on the provision of homes for the families that are in emergency or shared accommodation.

Families not included in the Housing Needs Assessment carried out in November 2018 but who have been permanently resident in the County for three years prior, may make an application for Traveller specific housing or social housing and it will be considered on the basis of the Council's current Allocation Scheme for Social Housing.

Assessment of Future Accommodation Needs

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 programme i.e. 1st July 2019 to 30th June 2024 has been carried out.

The assessment results indicate that there is a projected demand for an additional 108 units of accommodation. These will be achieved by refurbishment of existing vacant units, construction of new units, casual vacancies and standard social housing.

The table below sets out a summary of the assessment of demand for Traveller Accommodation for the period 2019- 2014.

71	Families currently living in shared/temporary/unauthorised sites
1	Roadside
36	Homeless Services / Private Rented
108	Gross Total Requirement

-53	Less those opting for standard social housing
55	Net provision for Traveller Specific Accommodation

Please note this figure does not include 82 individuals identified who will reach 18 years or over by the end of 2024. This could potentially result in the need for up to 41 additional Traveller Accommodation Units during the term of the programme for future family formations.

Policy Statement

South Dublin County Council is committed to ensuring that all Traveller Accommodation is provided to the highest standards in consultation with Traveller advocacy groups and local communities. The Council's aim is to provide Traveller Accommodation that is located in close proximity to services including schools, public transport, GP's, shops, playgrounds and sports clubs. We intend intends to achieve this aim through a construction and refurbishment programme which includes the development of new sites, the redevelopment of existing sites, Part V developments, casual vacancies and standard social housing.

The Council will consult and liaise with all the relevant stakeholders to assist with the implementation of this programme, including Travellers in need of housing, the Local Traveller Accommodation Consultative Committee, South Dublin County Traveller Interagency Group, National Organisations, Clondalkin and Tallaght Traveller Development Groups and the adjoining Local Authorities.

South Dublin County Council will continue to provide a comprehensive range of on-site services to Travellers including cleaning, site maintenance and mobile caretaker services.

It is our policy to provide Traveller Specific accommodation for the County's indigenous Travelling Community, i.e. those families who have been permanently resident in the county for three years prior to the adaptation of South Dublin County Council's Traveller Accommodation Programme 2019- 2024. The Council will continue to assist Travellers with their housing applications for those who wish to avail of standard social housing, Voluntary Housing, Housing Assistance Payment (HAP) and the Rental Accommodation Scheme (RAS).

Unauthorised encampments, illegal occupiers and anti- social behaviour will be dealt with in accordance with the Council's Anti-Social Behaviour Strategy and appropriate legislation.

Nothing in this programme shall prevent the Manager from exercising the powers conferred under Section 2 (9) of the City and County Management (Amendment) Act 1955, (as amended by Section 27 of the Housing Act 1988 and Section 24 of Housing (Traveller Accommodation) Act 1998 in an emergency situation.

Strategy Statement

The Council's approach to the provision of Traveller Accommodation over the lifetime of the programme will be as follows:

1. Filling of casual vacancies
2. Refurbishment/Extension of existing units
3. Standard social housing
4. Construction of new sites
5. Redevelopment of existing sites

The Council's Traveller Accommodation Unit in conjunction with Architectural Services will lead the delivery of the Programme. The Unit will consult on a regular basis with the LTACC and report on progress to the Council's Management Team, Housing Strategic Policy Committee and Local Area Committees.

A project management approach will be adopted to ensure that the construction and refurbishment programme is tracked and delivered. Please note that this programme is subject to the required funding from the Department of Housing, Planning and Local Government.

South Dublin County Council will continue to work in partnership with the other Dublin Local Authorities to identify areas of common interest and promote co-operation on Traveller Accommodation projects to ensure a common approach and to maximise resources.

Projected Targets and Implementation

Standard Local Authority Housing/Voluntary Housing Bodies

It has been identified that 53 Traveller families require accommodation in standard local authority housing/voluntary housing during the period of this Programme. Offers of standard local authority housing will be made in accordance with South Dublin County Council's Scheme of Letting Priorities and having regard to the Council's Anti- Social Behaviour Strategy and required attendance at Pre- Tenancy training programmes. The staff from the Traveller Accommodation Unit are available to meet and assist Travellers with their Housing Applications.

Standard Social Housing	No. of units – Target	No. of units- Delivered
2019	10	
2020	10	
2021	11	
2022	11	
2023	11	
Total	**53**	

Casual Vacancies

Travellers will be accommodated through casual vacancies which may arise in existing Traveller specific accommodation units and as Travellers move to Group or Standard Housing. During the previous programme, 62 units were returned and based on these figures we predict a return of 55 units during the term of this programme.

Casual Vacancies	Average Vacancy Rate	No. of Relets
2019	11	
2020	11	
2021	11	
2022	11	
2023	11	
Total	**55**	

New Sites

All new permanent sites will be designed to meet the requirements of the Department of the Environment, Heritage and Local Government Guidelines and all designs for new sites will be brought to the relevant Local Area Committee. Preferences of Travellers for Grouped Housing rather than Halting Sites will also be taken into account. The Programme as outlined below is subject of funding from the Department of Housing, Planning and Local Government and Planning Approval.

Traveller Specific Housing New Developments	No. of Homes	Electoral Area	Reference
Adamstown	24	Lucan	Adamstown Strategic Development Zone
Rathcoole	10	Clondalkin	Urban Design Framework and Masterplan for Rathcoole SDCC lands.
Total	**34**		

The following are a list of indicative locations for Traveller Accommodation with sites to be selected depending on need:

1. Baldonnell
2. Newcastle
3. Peamount
4. Brittas
5. Bustyhill
6. Steelstown
7. Windmill Hill/Blackchurch

Please Note: Other site(s) maybe determined by the Council during this programme subject to planning approval and depending on need, availability and suitability of sites.

Construction and Refurbishment Programme on Existing Sites

It is proposed to meet some of the accommodation needs of the Travelling Community through a construction and refurbishment programme subject to funding from the Department of Housing Planning and Local Government and Planning Approval.

The Construction and Refurbishment Programme will address any design and provision difficulties at existing sites. Consultation and agreement with the Travellers living on these sites is critical so that an acceptable design for each site is achieved.

The assessment identified a number of families living in halting sites with/without day houses who would like to live in group housing. In recognition of this, the Traveller Accommodation Unit proposes to begin a process for the construction/refurbishment of existing sites to provide long term sustainable Traveller Accommodation Developments.

Redevelopment Programme on existing sites

Project	No. of units	Part 8 Approval
Construction at Owendoher Haven, Rathfarnham	9 (8 construction + 1 refurbishment)	2019
Construction at Old Castle Park, Clondalkin	25	2020
Construction at Fonthill Road	6	Approved
Construction at Emergency Site, Lynch's Lane	10	2021
Total	**50**	

Refurbishment Programme on existing sites

Project	No. of units	Part 8 Approval
Extension at 2 properties at Belgard Park	2	2019
Extension at 1 property at Kishogue Park	1	2019
Total	**3**	

Transient Sites

The Council will consider the provision of transient accommodation in the County during the term of the Traveller Accommodation Programme 2019-2024. Transient sites should however only be provided following the full provision of the Traveller specific accommodation requirement of Travellers indigenous to South Dublin County. It is proposed to continue discussing with the other Dublin Local Authorities the need for and, if necessary, identify suitable locations for such provision in order to provide for a co-ordinated approach in the Dublin Region.

Temporary / Emergency Sites

There are a small number of emergency /temporary facilities for Traveller families who are indigenous to South Dublin County. The Council remains committed to the closure of these sites through the provision of safe, fully serviced, high quality accommodation during the lifetime of this programme. These sites include Lock Road, Whitestown Way, Fonthill Road, and Emergency 3 Bay at Lynch's Lane.

Unauthorised Sites

The law regarding unauthorised sites is outlined in the Housing (Traveller Accommodation) Act 1998 and the Housing (Miscellaneous Provisions) Act 2002. The Council will continue to use these powers where appropriate. In addition, in areas where High Court injunctions are in place the Council will seek the enforcement of these orders.

Homelessness

The Council's Allocations Scheme determines that priority be awarded to homeless persons, along with other specific categories of persons in need of housing. Families and other applicants presenting as homeless, along with those applicants with other priority status, are provided with social homes where available and based on their respective times on list.
While waiting for availability of social homes, homeless families are supported by the Council's Homeless Unit which provides assistance to those who find themselves homeless or at risk of becoming homeless. This Unit operates an advice clinic in County Hall, Tallaght and provides outreach and place-finding services across the County as well as detailing emergency accommodation options including central placement, self-accommodate, family hubs and other supported accommodation.

Older Person's Accommodation

It is proposed to consider the provision of housing specifically for older persons within the lifetime of this programme. Although life expectancy generally is lower among members of the Traveller Community, age profiles among our tenants are increasing. In some cases older Traveller tenants are living alone in accommodation which is no longer suited to their needs. South Dublin County Council is proposing to look at the potential for developing accommodation units for older persons in both new and existing developments. This would enable the Council to provide dwellings that meet the needs of older tenants. At the same time, it would free up larger dwellings that could then be allocated to applicants from our Traveller Specific Housing List or those in overcrowded accommodation.

Caravan Loans

It is acknowledged that Travellers can face difficulty in accessing finance to purchase caravans/mobile homes. The Council currently provides a Caravan Loan Scheme up to a maximum loan value of €10,000. 3 Caravan loans were advanced during the Traveller Accommodation Programme 2014-2018.

Summary

It is estimated that there is a current demand for 108 Traveller Families to be accommodated over the next five years. The targets below have been set subject to funding from the Department of Housing, Planning and Local Government, Planning Approval and Casual Vacancies which will arise during the term of the programme.

Standard Housing
53

Group Housing
30

Bays

25

Please Note: This figure does not include 82 individuals identified who will reach 18 years or over by the end of 2024. This could potentially result in the need for up to 41 additional Traveller Accommodation Units during the term of the programme for future family formations.

Management and Maintenance of Developments

It is the Council's policy to ensure that all halting sites and group housing schemes will be managed and maintained to a high standard. The Council will continue with its programme of work to improve the standard of existing permanent Traveller specific accommodation and where necessary the upgrading of such accommodation. The Council are currently piloting a Refuse Collection Service in conjunction with a contracted waste provider and residents of Cherryfield Way. The pilot will be reviewed and if successful, the service will be extended to other Traveller Accommodation Sites in the County.

Pre-Let Repairs

Prior to the letting of Traveller specific accommodation the Council will ensure that the necessary pre-letting works are carried out and will advise the prospective tenants accordingly.

Maintenance and Repair Service

South Dublin County Council is responsible for repairs associated with the general wear and tear of houses and bays. Where a repair is necessary due to fair wear and tear, the Council will ensure that this is completed in a reasonable time- frame as set out in the Tenant Handbook. Tenants should also be aware of their responsibilities regarding the upkeep of the property as set out in the Tenant Handbook. An out- of- hours emergency maintenance service is provided on weekday evenings, weekends and bank/ public holidays.

Fire Safety

The Council has taken a number of actions to improve fire safety in Traveller Specific Accommodation including:

- Traveller Development Groups have been contacted and provided with reports to highlight issues raised in fire audits
- An offer to install/fit a fire blanket, Carbon Monoxide alarm and Smoke detector was made to residents of all caravan units
- Programme for servicing/replacement of fire extinguishers
- Fire awareness training is arranged on a number of dates throughout the year
- Routine inspections of electricity supply at all halting sites
- Gas Installations are routinely inspected

Anti- Social Behaviour

It is Council policy that anti-social behaviour will not be acceptable in any Traveller specific or standard social housing and will be dealt with in accordance with the Council's Anti- Social Behaviour Strategy.

The Council will if required, meet with representatives of any resident /community groups to discuss matters relating to the management and maintenance of Traveller Accommodation.

Tenant Participation and Estate Management

The Traveller Accommodation Unit welcomes and encourages tenant participation in the management and maintenance of South Dublin County Council's Traveller Specific Accommodation. The unit meets various residents associations and community groups on site regularly and on an informal basis but it is proposed to establish a more formal structure for these meetings to take place. The Mayor has provided funding under a Traveller Participatory Budgeting Initiative in conjunction with the Tallaght and Clondalkin Traveller Development Groups to design and deliver training and capacity building for Travellers who wish to participate in the establishment of residents associations.

Consultation

As part of the preparation of this draft programme submissions were requested. Clondalkin Travellers Development Group, Minceirs Whiden, National Traveller MABS, Parish of the Travelling People, Tallaght Travellers Community Development Project and the Traveller Health Unit HSE made submissions which were taken into consideration in the preparation of this draft Programme. (Please see Appendix 1)

Local Traveller Accommodation Consultative Committee

This Committee will play a key role in the consultation process and will with the exception of the provision of temporary/emergency sites be consulted on matters relating to Traveller accommodation and other issues relating to Travellers.

Community/Interest Groups

The Traveller Accommodation Team are available to attend meetings, if requested to outline proposals for new permanent Traveller specific accommodation in areas. The Part 8 Planning Process as set out in the Local Government (Planning and Development) Regulations 2001 as amended and the Planning and Development Acts 2000 as amended will apply in respect of all proposals for permanent Traveller specific accommodation.

Traveller Accommodation Unit

The Unit is responsible for keeping both Travellers and the general public informed with regard to the development of proposals for permanent Traveller specific accommodation. Staff will attend meetings with Travellers, resident groups and stakeholders to discuss and inform them of any matters relating to permanent Traveller specific accommodation. The Unit is also piloting a monthly clinic with Tallaght Travellers Community Development Project held at their premises on the first Thursday of the month.

Closing Date for Submissions

With the exception of the provision of temporary/emergency sites, it is the intention of the Council to consult with as many people as possible who are affected by the proposals set out in the draft Traveller Accommodation Programme 2019-2014.
Those who will be consulted will be the Local Traveller Accommodation Consultative Committee, Travellers, community and interest groups and the public in general. Copies of the Draft Traveller Accommodation Programme will be available for inspection at County Hall, Tallaght, Civic Offices, Clondalkin and South Dublin Libraries and electronically on **www.sdcc.ie**
The latest date for the receipt of written submissions on the draft Traveller Accommodation programme is the **31st May 2019**. Written submissions can be made to the Traveller Unit, South Dublin County Council, Housing, Social and Community Department, County Hall, Tallaght, Dublin 24 or the Council's **Online Consultation Portal**

Review of the Traveller Accommodation Programme 2019-2024

Annual targets will be reviewed on an ongoing basis to ensure that progress is being maintained. Regular reporting will be provided to the Senior Management Team, the Housing Strategic Policy Committee and the Department of Housing, Planning and Local Government. A report on all activities under this programme will also be furnished at each LTACC meeting.
A review of the 2019-2024 Traveller Programme will be carried out not later than the 31st December 2021. Following the review, any amendment to the proposed accommodation programme must be made within 7 months.

Appendix 1- Submissions

Clondalkin Travellers Development Group
Minceirs Whiden
National Traveller MABS
Parish of the Travelling People
Tallaght Travellers Community Development Project
Traveller Health Unit HSE

Clondalkin Travellers Development Group

HOUSING DEPARTMENT
- 1 OCT 2018

Traveller Accommodation Programme Submission

The Housing (Traveller Accommodation) Act 1998 states that local authorities have a statutory responsibility to assess the accommodation needs of Travellers and to prepare, adopt and implement Traveller Accommodation Programmes (TAP) in their areas.

Accommodation is and always has been a critical issue for Travellers. Ireland is currently in the midst of a housing crisis with record numbers of people homeless and living in emergency accommodation and the government response has been poor. However, Travellers have always faced a housing crisis with housing policy very specific to the settled community and viewed through a settled lens by policy makers.

Emerging issues

Many Travellers are living in very poor accommodation conditions and in many cases a rather unsafe environment. Overcrowding has become a norm for many of the families living on sites either immediately effected or having family living in these conditions. Travellers living in some of the larger sites developed over the last number of years generally have issues with dampness, this is especially becoming a growing concern for many families who have young children growing up in these conditions. Pest infestation has also become an everyday part of life for many Travellers living in SDCC.

Traveller accommodation is an ongoing concern throughout the whole of Ireland for many years now. With some policy and legislative improvements at a national level it is very difficult to see the effects this has had at a local level for Traveller accommodation living in the area. In 2008 the Traveller

accommodation budget was 40m. This was then cut to 4m in 2013. Looking back on the figures it is important to note that during the TAP from 2008 – 2012 there was an underspending of 36% and this has been an ongoing trend throughout the many years. It is very concerning to find that there continues to be a rather large underspend of the national budget in 2018. While the increased allocation of €12 million to the Traveller Accommodation Budget is a welcomed step in the right direction, the concern of many Travellers and Traveller organisations is that the money will not be spent again.

Delivery of TAPS at present

An independent review carried out by the Department of Housing found that the majority of County Councils have consistently failed on delivery the TAPs over the last 18 years to provide adequate and culturally appropriate accommodation for Travellers. This report highlighted that more than €55 million was returned as unspent since 2000. This report also highlighted other key challenges the Local Authority face while implementing their TAPs.

Planning was in the past, and continues to be a problematic area when it comes to Traveller Accommodation with many settled residents and Elected Representatives opposing the Part 8 for new builds.

When assessing the needs for Travellers in the area it was expressed that the current process underestimates the need.

Also it was highlighted that there is a lack of monitoring and reporting in regards to implementing the TAPs.

Recommendations

Development of an achievable and accountable TAPs : The TAP must be an achievable and manageable piece of work. To further develop the process it must be able to be monitored and evaluated on a regular basis to highlight key issues throughout the process. Annual reports on the TAP and its performance should be carried out and presented to the Department of Environment and other invested parties. This also highlights the need for a separate housing agency to further oversee the performance of the TAPs.

While the Caravan Loan Scheme was a welcomed idea in 2017 to many Travellers in the area in the hopes that this scheme may offer the opportunity for families to provide safe and habitual environments for their family. This sadly has not been the case as there has been an ongoing issue with the council providing this loan to date. Furthermore to this it has also been highlighted by MABS that the Caravan Loan Scheme is not as beneficial to families as once hoped and therefore would highlight the need for there to be a "Rent To Buy" scheme proposed instead. This would allow families to takeout a larger sum of money to provide a more suitable home.

The redevelopment of Old Castle Park has been on this agenda for many years and CTDG would ask that this again becomes a priority.

Key Recommendations

1. Reinstate the full budget for the Traveller Accommodation Programmes in Local Authorities to address the increasing homeless and housing needs of Travellers and the large number of young people in the Traveller community who will require housing over the next 10 years.

2. Review the current structures for implementing culturally appropriate housing under Housing (Traveller Accommodation) Act 1998 to be inclusive of higher level decision making bodies locally and nationally. The chairperson should also have the power to sanction relevant agencies and departments for not reaching their targets in relation to their allocated funding and key performance indicators.

3. Key performance indicators should be developed in partnership and consultation with Travellers and Traveller organisations in the SDCC area.

4. Accommodation should take into consideration the culture and the nomadic lifestyle of Travellers and offer opportunities that respect culture and diversity.

5. Group housing schemes should be developed to incorporate space for social housing and trailer housing on the same site in order to meet the diverse needs of Travellers and keep families close together.

6. Conflict arising on sites should be managed more effectively by local authorities in order to reduce the negative impact on families. A Critical Incident Protocol should be developed by each local authority in conjunction and consultation with Travellers and Traveller services to identify and implement best practice in managing conflict in group housing schemes.

7. All local authority staff, housing agencies and homeless services should engage in cultural competency training as part of induction and updated every 2 years.

8. Funding to be provided to Traveller organisation to support education and awareness raising among the settled community and the integration of Travellers into communities where planning objections have been raised.

Key Recommendations for temporary sites

- Communal shower/toilet facilities are subject to regular maintenance checks and have sufficient and safe heating facilities within them. In some cases units should be removed and replaced with units that are acceptable to the residents and meet current health and safety standards.
- The importance of regular electricity maintenance for each bay, on each site, to ensure we never have a repeat of the Carrickmines tragedy.
- **Urgent** prioritization of accommodating single parents with children, and families who have children with disabilities.

- A courtesy call should be made, in person, to each family by members of SDCC Traveller Accomodation unit alongside CTDG to familiarize themselves with (and assess) the living conditions of each family, each quarter.

- Well maintained green/recreational areas for children/young people to play and enjoy the outdoors on each site.

- A longer term goal we at Clondalkin Travellers Development Group would also advocate for would be the rolling out of several new Traveller specific accommodation sites across the South Dublin County built in consultation with the families who will reside there.

Minceirs Whiden (Cant for Travellers talking) Ireland only all Traveller Forum welcomes the opportunity to make this submission to Local Authorities on the fifth round of Traveller Accommodation Plans 2019-2024.

September 2018

1
Minceirs Whiden (Cant for Travellers talking) Irelands only all Traveller Forum. Address: Minceirs Whiden Room 2, Our Lady of Lourdes Community Center, Childers Road, Limerick. Tel: 085 880 4450

Irish Traveller Accommodation Crisis

We cannot overstate the accommodation crisis the Traveller Community is struggling with or the negative impact it is having on peoples lives or how damaging it is to both their physical and mental health. The Traveller Community is crying out for help from Minceirs Whiden and Traveller organization local and national through the country, the family names and locations are different, but the issues are the same. Traveller families existing in either in substandard or overcrowded conditions, under treat of eviction, who are unable to access private rental accommodation, families falling foul of the law because they have returned to the road, illegally camped on roadsides because they have no other option.

The Irish Traveller Community have been dealing with an accommodation for crisis decades, but the current accommodation crisis Ireland is experience has exasperated this situation for our Community. Currently the Irish Travellers currently represent 11% of the homeless people in Ireland when we take into account that the Traveller Community makes up less than 1% of the population less than 40,000 people this is a staggering over representation, yet this likely is under represents the true figure.

Our People are in despair they have no one to turn to who can provide solutions to their accommodation needs, it is soul destroying to us representatives of Traveller organization and Traveller activist that significant portions of Traveller accommodation budgets is underspent when our community is such dire need.

There is no doubt in our minds the minds of the Traveller Community that the despair people are feeling because of their accommodation needs is playing a significant part in epidemic of suicide that has taken hold within the Traveller Community over the past decades, suicide which now accounts for 10% of deaths of Our Community, 7% higher than in wider Irish society.

It is well established that poor living conditions, homelessness and threats of eviction are contributory factors to mental health issues and suicide."

Suicide is not the not only lives that the Traveller accommodation crisis has claimed over the decades, there the early deaths due to chronic ill health from living in damp and unhealthy environments, the lives lost through accidents and injuries from living in dangerous environments they had no other choice but to be in, the numerous Travellers who lost their lives in through Trailers fires , their homes the most recently the Carraighmines tragedy that claimed 10 lives in one night.

These lost lives are the legacy of racism and discrimination that our community has to deal with simply because of their Traveller Identity. And we understand the devastation impacts these unnecessary deaths have on families the legacy issue they leave behind, we see firsthand the broken parents, the devastated spouse, the orphaned children and babies who lives have been alter forever. We see and feel this pain first hand because these lost lives are not statists to us they are our families, our friends our community.

This may be not be what some of you expect to read in a submission on Traveller accommodation but this the harsh reality and we be failing in our duty to our community by not stating this truth clearly to everyone who's play a role in delivering on Traveller accommodation so that we all understand the impact failure to deliver on Traveller accommodation is having on desperate families who are being pushed to the brink.

2
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The sad truth that racism and discrimination is at the heart of the Traveller accommodation crisis and that with decisive action it could be resolved relatively quickly, what the Traveller Community is witnessing is that those who are responsible for delivering on Traveller accommodation are kicking the can down the road because it is a be an easier option than pushing through prejudice or standing up to bigots. This practice is not without consequence.

We need our government to lead by example – to take decisive action to ensure Traveller Accommodation Plans. It is not enough for the government to allocate a budget and the task Local Authorities to develop and deliver on TAP's our government needs to become more pro-active on this issue until it is resolved.

In 2000 £40, Million was allocated to the Traveller Accommodation Program because our government recognized the accommodation needs and the sever disadvantage within the Traveller Community, people living in 3rd world conditions. As a community we welcomed this development with confident that finally we see the accommodations needs of our community meet.

Sadly, we have seen is successive TAP's not being deliver on, budgets being reduced (2012 to €4. Million) with significant portions being under spent annual while the Traveller Accommodation crisis escalated and people becoming more frustrated and in despair. We welcome the recent increase in Traveller Accommodation budget to €12. Million

While this money would not resolve the crisis in Traveller accommodation it could have without question been used to resolve the accommodation issue for many families, yet as evident from attached doc a significant portion of this budget went underspent.

The issues and challenges facing the Traveller Community –
Traveller Accommodation.

- Many Travellers continue to live in very poor accommodation conditions and in an unsafe physical environment.
- There are often damp problems; pest infestation and lack of basic facilities such as sewerage, public transport, paved roads, pedestrian pavements and electric lighting.
- Poor site design and drainage problems as well as environmental hazards from land adjoining Traveller accommodation are concerns for Traveller residents.
- Travellers are severely discriminated against when trying to access private rental accommodation and live under constant fear of eviction.
- As building of Traveller Accommodation can be a contentious issue some local politicians have taken advantage of this for their political gain by stirring up opposition to block and stop Traveller Accommodation. Opinion to Traveller accommodation is one of the key reasons why the local authorities have not acted on their past accommodation plans,
- Local politicians who are Anti Traveller politicians often sit on Traveller accommodation groups this can make these both challenging and unprogressive spaces.
- Failure by County Mangers to address anti Traveller bias or use executive powers to push through on Traveller accommodation plans.

3
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- Lack of awareness by local authorities' awareness on the level of multi layers of racism and discrimination the Traveller Community experiences in their daily lives.
- The disconnect by local authority how the failure to deliver on Traveller accommodation is impact on physical and mental health leading to chronic ill health and early death, depression and Suicide.
- Budget and Under spend of the Traveller Accommodation budget –initially it was 40 million a realistic figure that has the potential to make real impact, this was reduced in 2013 to 4 million dues to austerity and has recently increased to 12 million, every year a significant portion of this money goes back to the exchequer unspent (see attached Appendix)
- Because of high level of unemployment or unsecure employment most Traveller do not have access to borrowing to purchase their own homes so remain reliant on local authorities.
- Lack of awareness or resources within the community of Residential Caravans /Mobile Homes most caravans the Irish Travellers community live in are "Summer Caravans "and are not suitable for year -round living with no insulation and inferior standard making them cold and damp in the winter and in bad weather. This a significant factor leading to ill health and chronic medical condition affecting so many of our Community and is also a leading factor in fuel poverty.

Overcrowding and Homelessness

- Out of necessity many Travellers are now doubling up in accommodation i.e. bays on sites and houses with extended family members, in many cases already overcrowded accommodation, this is neither acceptable or sustainable and creates the conditions for unnecessary conflicts, and increase risk of accidents and fire hazards
- Overcrowding can also be used as justification for eviction by Local Authorities. This has occurred on a number of occasions post Carrickmines regarding a national fire safety audit in Traveller accommodation.
- Audits were applied systematically across the country to ensure that practical and appropriate fire safety measures were in place and taken to prevent loss of life and serious injury in local authority Traveller accommodation.
- Despite receiving an assurance that the audits would not result in forced evictions, Traveller organizations note that a number of evictions have taken place, leaving families homeless or forcing people to stay at homes and bays of extended family members. In 2016, 23 families were evicted from Woodland Park, a halting site in Dundalk, on the basis of fire safety concerns.
- The current accommodation crisis Ireland is experiencing has added additional pressure on our community, Irish Traveller currently represent 9% of the homeless people in Ireland, yet our community make up less than 1% of the population.

Lack of implementation on Traveller accommodation has been met with scrutiny both nationally and internationally by human rights organizations and monitoring bodies.

- The recent findings by The European Committee of Social Rights (ERRC v. Ireland ECSR decision, May 2016) note that while significant progress has been made in the area of Traveller accommodation, the ECSR found a number of violations of the charter on the following grounds:
- Insufficient provision of accommodation for Travellers: of 1,000 "transient bays" identified as needed by a 1995 task force, however there are only 54 in existence and not all function as proper transient sites; the Traveller community has also grown in the meantime

4
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- Many Traveller sites are in an inadequate condition: a “not insignificant number” of sites are in poor condition, lack maintenance and are badly located; reported problems included lack of water, poor refuse collection and problems with damp, flooding and sewage
- Legal safeguards for Travellers threatened with eviction are inadequate: Relevant legislation fails to provide for adequate consultation or notice or a requirement to propose alternative accommodation; there is also no legal aid available and limited access to judicial review.
- In 2011, the European Commission adopted an EU Framework for National Traveller/Roma Integration Strategies focusing on four key areas: education, employment, healthcare and housing. EU Member States have made a commitment towards promoting Traveller/Roma inclusion through the development of National Traveller/Roma Integration Strategies. The National Strategy of each Member State is assessed by the European Commission on an annual basis.

National Traveller Roma Inclusion Strategy – (NTRIS) (2017-2021) approved by Government on 30 May 2017. We believe that with the timely implementation of the identified key priority areas and associated actions identified in the Cross-Department Strategy can make real progress resolving the Traveller Accommodation crisis and increase Traveller and Roma inclusion in Ireland.

It is vital that the key actions and objectives identified in relation to accommodation are implemented ASAP, including:

- The adequate provision of accessible, suitable and culturally appropriate accommodation available for Travellers.
- The delivery of Traveller accommodation is underpinned by a robust monitoring and evaluation framework.
- Ensure that the budget allocated for Traveller specific accommodation is used fully and appropriately.

The Department of Housing, Planning, Community and Local Government and Local Authorities are named as key drivers in implementing these actions.

Key Recommendations

<u>Development of effective Traveller Accommodation Program’s</u>

- Must be underpinned by vigorous monitoring and evaluation
- Local authorities submit an annual progress report to The Department of Housing Planning Community to ensure the Traveller accommodation plan are progressing timely manner.
- Local authorities to provide explanation to **The Department of Housing, Planning on underspend of Traveller Accommodation** budget.
- Chief Executive Officers participate at Traveller accommodation committees to ensure good practice or where progress is not being made (this may not be feasible for every meeting but would set the right tone to see these committees become more effective).
- Chief Executive Officers of each local authority to present annual TAPS reports to the Joint Committee on Housing, Planning and Local Government

5
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- Implementation of guidelines developed by the National Traveller Accommodation Consultative Committee in all Local Authorities
- 1998 Traveller Accommodation Act - Many of the recommendations made in the 1998 Traveller Accommodation Act have not been implemented all Local Authorities must take all relevant actions to ensure they are delivering on their obligations laid out in this document.
- Transient Halting Site - There has been a failure to deliver on Transient Halting Sites through the county, each Local Authority must include the provision of Transient Halting Sites are part of their Traveller Accommodation Plan.
- Local Authorities inform and support the Travellers Community in purchasing Residential Standard Caravans / Mobile Homes "British Standard BS3632:2015" through the Caravan Loan /Rental Scheme.
- The budget for Caravan Loans /Rental Scheme must be increased to enable Travellers living in Caravans which are their permanent homes to purchase better quality Caravans /Mobile Homes that are residential standard.
- The Department of Housing, Planning provide any necessary support to Chief Executive Officers to use their executive power when necessary to progress Traveller Accommodation Plan.
- The Department of Housing, Planning provide a mechanism for Travellers in crisis situation /long term on accommodation list to access loan from Traveller Accommodation unspent budget to purchase a home.

Traveller representation on Traveller Accommodation Program to ensure functioning LTACC must

- Have active Traveller participation and representation.
- Traveller organizations will nominate representatives to LTACCs, where Traveller organizations do not exist in particular location National Traveller originations to support nominations
- Ensure Memorandums of Understanding' to inform the work practices of LTACCs and ensure an effective and pragmatic approach to working in partnership in line with NTRIS and positive duty obligations as per Section 42 of the IHREC Act 3 (2014) for members of the LTACC

Annual reports to be developed by Local Authorities to monitor progress and submitted to the Department of Housing Planning Community and Local Government

- Chief Executive Officers of each local authority to present annual TAPS reports to the Joint Committee on Housing, Planning and Local Government
- Implementation of guidelines developed by the National Traveller Accommodation Consultative Committee in all Local Authoritie

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denoted by the British Safety Standard BS3626.2015. Residential standard homes (as opposed to holiday homes) are more fuel efficient and provide families with a better quality of accommodation. Our recent study recommends that the Department of Housing Planning and Local Government introduce guidelines for local authorities in the provision of residential standard mobile homes. It also acknowledges that Travellers on low income will not be in a position to purchase a residential standard mobile homes and that there should be a rental option on offer from local authorities. We are currently working with other National Traveller Organisations and engaging with the Department of Housing Planning and Local Government for the introduction of a National Caravan Rental Scheme. This is to ensure that Traveller families get access to good quality affordable accommodation.

Recommendation 3: We recommend that the South Dublin Traveller Accommodation Programme introduce a caravan rental scheme for families who are not in a positon to finance the purchase of a residential standard mobile homes.

Addressing Fuel Poverty, increasing fuel efficiency of Traveller Specific Accommodation

National Traveller MABs is concerned with 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 issue 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. [2] National Traveller MABS is currently undertaking a study into the nature and extent of fuel poverty amongst Travellers in Ireland, as this issue has been consistently highlighted to us through our work in the areas of accommodation, disconnections and utility provision. In addition, a recent report undertaken by Dublin 10&20 MABS indicated that Travellers living in mobile homes in Dublin 10 and 20 area had higher rates of fuel poverty than other low income groups locally. There are established links between fuel poverty and poor health with people in fuel poverty tending to describe poorer overall health than those not in fuel poverty.

Improving Energy Efficiency of Traveller Specific Accommodation

Mobile homes/Trailers

[2] 'McAvoy, H. All-Ireland Policy Paper on Fuel Poverty and Health Dublin: Institute of Public Health in Ireland, 2007.

National Traveller MABS is aware that non-residential standard mobile homes are less fuel efficient than those manufactured to a residential standard and therefore has implications for household expenditure and fuel poverty. Most mobile homes lived in by Travellers in South Dublin are not of residential standard, and our recent report into the cost of mobile homes recommends that all Travellers are supported to live in residential standard mobile homes/trailers, through either increased amounts on offer for Caravan Loans or through a rental scheme.

Recommendation 4

National Traveller MABS recommends that SDCC provides for supports to families for access to residential standard mobile homes.

Assessment of Fuel efficiency of existing group housing scheme.

Improvements in fuel efficiencies of accommodation can reduce fuel poverty in low income groups. Many older dwellings are less fuel efficient than newer ones. We are welcome the fact that South Dublin County Council has incorporated fuel efficiencies into its recent new build Travellers specific and local authority houses.

Older group housing schemes do not have the same energy efficiency ratings as more recent new builds. An assessment of the fuel efficiency of existing group housing scheme and a programme of upgrade to more fuel efficiency would assist in reducing fuel poverty in Traveller households in the county.

Recommendation 5

We recommend a fuel efficiency assessment of existing group housing schemes followed by a programme of upgrades to reduce fuel poverty amongst Travellers in South Dublin.

Recommendation 1: We recommend that the South Dublin Caravan Loan Scheme incorporates an accessible application process. The Scheme should support referral to MABS services in the South Dublin County Area for the provision of independent financial advice to loan applicants. The scheme should make provision for loan repayments to be deducted at source from the borrower's income.

Loan Amount on offer from the Caravan Loan Scheme

In 2018, we undertook a study into the cost of mobile homes/trailers. Findings from the study included the following:

- 79% of used stock priced at under €10,000 had either no double glazing or central heating and was between 13 and 15 years old
- 30% of stock priced between €10,000 and €15,000 had either no double glazing or central heating and was between 10 and 15 years old

Given that the loan amount on offer under SDCC's existing scheme is in €10,000, we are concerned at the purchasing power of the loan scheme in that it is not adequate to secure good quality accommodation.

Our study concluded that the loan amount on offer for Caravan Loans Nationally needs to be increased to ensure Travellers get access to a better standard in mobile homes. We note that the Housing Agency's review of the *National Scheme of Loans and Grants for the purpose of purchasing Caravans* also recommends increasing the loan amount, (it recommends an increase to €20,000). National Traveller MABS is aware that increasing the loan amount may make loans unaffordable for most Travellers and lead to over-indebtedness. However for those who are in position to finance a loan and where applicants have received independent financial advice that confirms this then the amount available should increase to ensure access to better quality accommodation.

Recommendation 2: We recommend the loan amount on offer from the South Dublin Caravan Loan Scheme be increased to between €15,000 and €40,000.

Caravan Rental Scheme

Our recent study into the cost of mobile homes/trailers found a range of mobile homes on offer ranging from below €10,000 to over €100,000. We also found that a key factor in the cost of mobile homes was whether or not they were built to a residential standard in the first instance. This is

Submission to South Dublin County Council Traveller Accommodation Programme 2019-2024

September 2018

National Traveller MABS, Unit 2 North Park, North Park Road, Finglas, Dublin 11

Tel:0761 07 2230 email: info@ntmabs.org

National Traveller MABS was formally established in 2005 and is funded by the Citizens Information Board (CIB). National Traveller MABS ***is a leading advocate for the financial inclusion of Travellers in Ireland.***

Introduction

National Traveller MABS is concerned with the financial inclusion of Travellers. '*Financial exclusion refers to a process whereby people encounter difficulties accessing and/or using financial services and products in the mainstream market that are appropriate to their needs and enable them to lead a normal social life in the society in which they belong.*[1] Travellers experience multiple forms of financial exclusion which has a range of implications one of which is accessing basic necessities such as fuel efficient affordable accommodation. The role of National Traveller MABS is to empower Travellers to access appropriate financial services and manage their finances effectively. We also seek to address financial exclusion by effecting change in policy and practice.

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. In 2018, we also undertook a study into the cost of mobile homes/trailers, this study also made a number of recommendations in relation to the provision of fuel efficient affordable culturally appropriate accommodation.

[1] European Commission, (2008) Financial Services Provision and Prevention of Financial Exclusion

Summary of Recommendations

1. *We recommend that the South Dublin Caravan Loan Scheme incorporates an accessible application process. The Scheme should support referral to MABS services in the South Dublin County Area for the provision of independent financial advice to loan applicants. The scheme should make provision for loan repayments to be deducted at source from the borrower's income.*
2. We recommend the loan amount on offer from the South Dublin Caravan Loan Scheme be increased to between €15,000 and €40,000.
3. We recommend that the South Dublin Traveller Accommodation Programme introduce a caravan rental scheme for families who are not in a positon to finance the purchase of a residential standard mobile homes.
4. We recommend that that SDCC provides for supports to families for access to residential standard mobile homes.
5. We recommend a fuel efficiency assessment of existing group housing schemes followed by a programme of upgrades to reduce fuel poverty amongst Travellers in South Dublin

Caravan Loan Scheme

Features of an accessible scheme

NTMABS notes that South Dublin County Council has re-introduced a Caravan Loan Scheme during 2018. We welcome the council's support of Travellers in accessing credit to purchase mobile homes/caravans. The 2015 review of NTMABS supported Loan Guarantee Schemes recommended that:

Micro Lending Schemes for the purpose of financially excluded people and people on low income should:

- Have an accessible application process
- Provide engagement with money management support
- Have clear delineation of roles and responsibilities between assessor, appraiser and guarantor
- Make provision of repayment deduction at source(subject to protected income considerations

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Parish of the Travelling People
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Traveller Accommodation Unit
Housing Department
South Dublin County Council
County Hall
Tallaght
Dublin 24
D24 YNN5

HOUSING DEPARTMENT
28 SEP 2018

27th September 2018

RE: Submission to the Draft Traveller Accommodation Programme 2019-2024

Fr Paul O'Driscoll P.P. asked me to respond to your invitation to submit views on behalf of the Parish to the Draft Programme.

I have enclosed the submission for the consideration of the Council. A copy is available in PDF format on request.

Sincerely,

Colin Thomson
Inclusion Manager

Enclosure: "Challenging Antigypsyism to Deliver Change"

CHALLENGING ANTIGYPSYISM TO DELIVER CHANGE

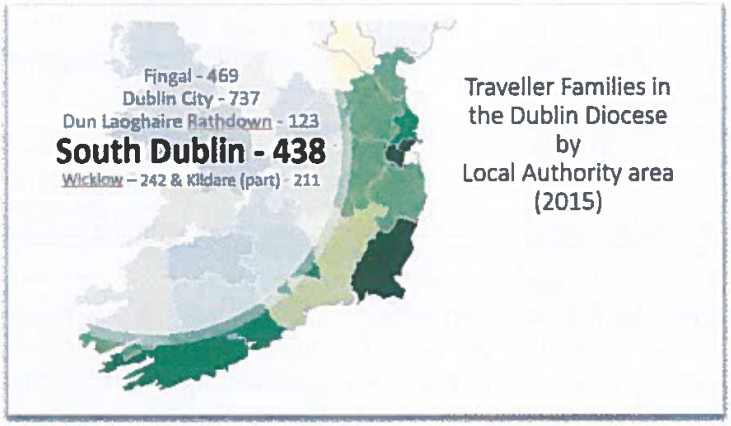
Submission to South Dublin County Council Draft Traveller Accommodation Programme 2019-2024

Antigypsyism is not only widespread, but also deeply entrenched in social and cultural attitudes and institutional practice. This makes the challenge of tackling it both more urgent and more difficult. Antigypsyism is like a continuous headwind. 'Roma inclusion' will remain illusory as long as we do not confront the headwind itself. (www.antigypsyism.eu)

Parish of the Travelling People

About Us

The ***Parish of the Travelling People*** was set up in 1980 to minister to the needs of the Traveller community across the Diocese of Dublin which covers the geographical area from Balbriggan to Arklow and over to Athy. Therefore, it covers the administrative area of four local Authorities in full and a part of Kildare.



The ministry of the Parish is part of the mission of the wider Church to Travellers, Roma and Gypsies. The Church has a firm commitment to playing its part in building an inclusive society. This is reflected in a statement by bishops of the Commission of the Episcopates of the European Union (COMECE) in face of the on-going challenges even with the adoption of the EU Framework for *National Roma Integration Strategies* up to 2020:

> COMECE is committed to promote [the Roma people's] full integration into societies, respecting their culture in diversity and meeting their specific needs, including education, employment, housing, healthcare and citizenship.[1]

Members of the Parish team participate on the Steering Group that monitors the *National Traveller Roma Inclusion Strategy 2017 – 2021* (NTRIS). The Parish team seeks to act as an ally to Travellers and to represent the concern of the Church for the promotion of the integral human development of Travellers. The work of the Parish has developed over the decades. However, it continues to focus its resources ***to celebrating with Travellers their faith as a living reality in everyday life and to challenge antigypsyism***. The Parish fosters dialogue at the local parish level and works to build an inclusive society. A pilot scheme developed in the South Dublin County Council area and its findings were published in 2013; *Embracing Inclusion*. The Parish understands its work is urgent.

[1] COMECE, Press Release Webnews, 06/08/2018, Roma people, committing for their full inclusion into the European societies

Transforming the analysis and the consultation process

On 1st March 2017, An Taoiseach announced Ireland's recognition of Travellers as a distinct ethnic group in Irish society. The statement is a "symbolic gesture" that "creates no new rights and has no implications for public expenditure", but if it manages to "create a new platform for positive engagement by the Traveller community" then recognition of ethnicity can be transformative.

The 2014-2018 Programme states that the Council acknowledges the cultural identity of Travellers by striving to provide culturally appropriate accommodation. Also, there is a reference to "resistance of some sections of the community" but the Council fails to mention discrimination which reproduces structural disadvantages. The term "antigypsyism" refers to an ideology that is alien to integral human development of Travellers and Roma. It is a form of narrative by which we discipline, oppress and violate others rather than respect their dignity and human rights. It focuses on a minority community among us, but it is our issue. It has the power to subvert a programme about accommodation.

When it is not named, antigypsyism has the power to become normalised. In this way, antigypsyism creates and legitimises poverty, poor accommodation, poor health and poor education; "It inverts cause and effect."[2]

The 2014-2018 Programme states that the Council carries out its statutory obligation by taking "reasonable steps to secure the implementation of Traveller Accommodation Programmes" and it states that "the problem of unauthorised encampments has for all practical purposes been eliminated in the County". However, it neglects to highlight the consequences of the unmet needs. If that approach continues, it is reasonable for some to argue that there will be a trend for unauthorised encampments to be replaced by overcrowding and homelessness.

Research in June 2018, on behalf of the Irish Human Rights and Equality Commission, states that Travellers are "the most at risk of being homeless"[3]. It cites other sources that state that "Over one-in-three Travellers reported living in 'very unhealthy' and 'very unsafe' homes" and that "that Irish people are least comfortable with sharing a community with Travellers".

The Parish notes the findings of the research above and recalls the submissions of local Traveller organisations to the 2014-2018 Programme "for Council staff to be trained to work in a low threshold environment" that may avoid Traveller becoming homeless. There are complex issues to be addressed hopefully through more effective inter-agency collaboration.

[2] Alliance Against Antigypsyism, Antigypsyism – a reference paper, June 2017, 3.
[3] Grotti, R., Russell, H., Fahey, É., & Maître, B. (2018). Discrimination and Inequality in Housing in Ireland, ix.

Recognising NTRIS (2017–2021)

In an effort to play its part in the urgent duty to tackle the economic and social marginalisation of Roma and Travellers throughout Europe, in June 2017 the Irish government published its revised *National Traveller Roma Inclusion Strategy* (NTRIS). Its aim is to improve the lives of Travellers and Roma and to close the gap in four key areas: education, employment, healthcare and housing. Taking heed of the theme and objectives of accommodation in NTRIS, at the local level South Dublin County Council (SDCC) *should provide adequate accessible, suitable and culturally appropriate accommodation for Travellers and delivered through the application of robust monitoring and evaluation mechanisms that ensure the full expenditure of funds allocated for Traveller specific accommodation.*

Actions 127 to 130 are associated with the objective above:

Put robust mechanisms in place to monitor expenditure and delivery, including periodic reviews to assess progress in meeting needs and to identify new and emerging needs.

Develop the capacity and operation of Local Traveller Accommodation Consultative Committees to maximise their contribution to local accommodation programmes and policies.

Apply any guidelines developed by the National Traveller Accommodation Consultative Committee in relation to the operation of the Local Traveller Accommodation Consultative Committees

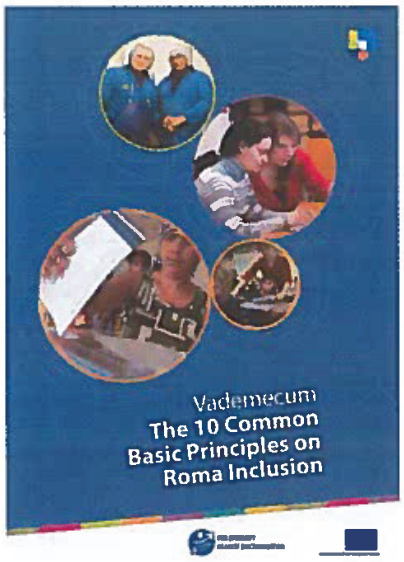
Assess if there are any barriers to Travellers accessing social housing waiting lists.

The AGM of the *Irish Traveller Movement* was held on 12th September 2018 at which it launched a campaign **#TravellerHomesMatter**. Minister of State at the Department of Housing, Planning and Local Government, Damien English addressed the conference. He stated that he had appointed an Expert Panel to fix a system that is failing. He admitted that the Traveller community does not get the solutions they look for. Instead resources go elsewhere or remain unspent (over the last 10 years about €50 million). The Parish welcomes the honest exchanges that supports effective collaborative work. Indifference and ineffective approaches to working together reflect mindsets that fail to challenge institutional practices that do not deliver.

Recognising the 10 common basic principles of Roma inclusion

For the successful design and implementation of actions to support Roma (Traveller) inclusion In 2009, the EU invited Member States to apply 10 Common Basic Principles[4] as a framework. These principles are the fruit of experience and a growing concern about the lack of implementation of inclusion strategies. They are offered as a guide to policy-makers to overcome antigypsyism that preserves forms of on-going exclusion. Currently, NTRIS contains a theme on Public Services. The objective is that public services should be provided in a way that is non-discriminatory and respectful of Traveller and Roma culture and identity. Action 145 is associated with the objective and it states:

All Departments, statutory agencies and Local Authorities will ensure the ten common basic principles on Roma inclusion adopted by the European Commission underpin the strategic and operational activities of all Government Departments, statutory agencies and Local Authorities.



1. Constructive, pragmatic and non-discriminatory policies
2. Explicit but not exclusive targeting
3. Inter-cultural approach
4. Aiming for the mainstream
5. Awareness of the gender dimension
6. Transfer of evidence-based policies
7. Use of European Union instruments
8. Involvement of regional and local authorities
9. Involvement of civil society
10. Active participation of the Roma

This vademecum provides a practical check-list on how to implement each of the Principles.[5]

[4] Permanent Representatives Committee. "Inclusion of Roma." *Council of the European Union.* 28 May 2009.
[5] The publication is available online at EU Publications or follow the link https://publications.europa.eu/en/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0

Providing an effective assessment of need process

Assessment of Demand for Accommodation for Travellers 2014 – 2018

Proposed Construction Programme 2014- 2018

It was acknowledged by all stakeholder groups that the assessment of future accommodation needs in relation to the creation of new family units was not fit for purpose.[6]

[6] RMS, Research Report *Review of Funding for Traveller-Specific Accommodation and the Implementation of Traveller Accommodation Programmes* June 2017, 39.

The Parish recommends:

- That the South Dublin County Council Traveller Accommodation Programme (2019-2024)
    - Contains a statement that commits the Council to combat antigypsyism, in order to deliver change (Appendix A)
    - Develops an implementation plan in line with NTRIS (2017-2021)
        - Uses Ethnic identifiers and disaggregated statistics as recommended in NTRIS, Action 146.
    - Reflects an adherence to the 10 common basic principles of Roma inclusion;
        - for example Principle 7: Cooperate with national governments in order to get their concrete commitments on the use of Structural Funds and other financial instruments for Roma inclusion.
        - For example Principle 10: That South Dublin County Council develops effective spaces and systems to work with Traveller organisations
    - Providing an effective assessment of need process that includes:
        - A positive and robust assessment of mobility (nomadism) and transient sites
        - Achievable targets for the 2019-2024 Programme
        - Initiatives to develop affordable Caravan Loans

APPENDIX A – Antigypsyism

The Council of Europe (CoE) through Its independent monitoring body, the *European Commission against Racism and Intolerance (ECRI)* expanded the understanding of the term. It stated that "antigypsyism" is,

> *a specific form of racism, an ideology founded on racial superiority, a form of dehumanisation and institutional racism nurtured by historical discrimination, which is expressed, among others, by violence, hate speech, exploitation, stigmatisation and the most blatant kind of discrimination; [and] an especially persistent, violent, recurrent and commonplace form of racism ...inflicted on a large number of Roma, and by the too frequent impunity that the culprits enjoy.*[7]

The fact is, society demonises the Traveller and justifies the conditions for his or her marginalization. So, the term "anti-gypsyism" (with a hyphen) is not used. That term implicitly maintains a focus on society's notion of a minority in its midst; the "gypsy". By removing the hyphen, the term "antigypsyism" dispels the demon and focuses on the disposition of mainstream society. The word refers to the settled ideology.

[7] ECRI. "ECRI General Policy Recommendation No. 13: On Combating Anti-Gypsyism and Discrimination Against Roma." *Council of Europe.* 24 6 2011, 3-4.

Proposal to the Local Traveller Accommodation Consultative Committee from Tallaght Travellers Community Development Project regarding submission for inclusion in the Traveller Accommodation Programme 2019 – 2024

Local authorities have failed to provide Traveller specific accommodation in accordance with their own targets. The number of Traveller families living in private rented (owned by private landlords) accommodation has increased and the number of families living in Traveller specific accommodation has steadily decreased over the past decade. This is the result of Travellers being forced out of their nomadic way of life by a combination of a lack of Traveller specific accommodation and legislation which criminalizes (and otherwise renders impossible) nomadism in Ireland. Travellers have been forced to abandon nomadism. State funded research establishes that failings on the part of local authorities, and not changes in the way of life of Travellers, have driven down the number of families opting for Traveller specific accommodation.

It is important to note that while the number of families living on unauthorized sites has decreased, in recent years there has been a marked increase in the number of families sharing accommodation. The difficulties and concerns relating to families sharing accommodation were highlighted as far back as the 2007 NTACC annual report:

'*It would be worrying if the number of families sharing all types of accommodation continued to increase, as sharing, by its nature, puts pressure on already limited resources and can worsen living conditions'.16*[1]

[1] Irish Traveller Movement Report In response to Ireland's third examination under the International Covenant on Economic Social and Cultural Rights (September 2014)

Tallaght Travellers recognizes the very serious issues regards the accommodation needs of Traveller families in the SDCC area. This has been exacerbated since 2014/2018 due to the targets within the TAP programme not been met. A question that was asked on 14th November 2016 in the south county Dublin council chambers by councillor Sarah Holland,

MEETING OF SOUTH DUBLIN COUNTY COUNCIL

Monday, November 14, 2016

QUESTION NO.4

QUESTION: Councillor S. Holland

Can the Chief Executive please let me know how many people are currently waiting on caravan bays in the county, and how many we have available?

REPLY:

There are currently 50 families who have expressed an interest in being housed on bays in the County.

There is currently only one vacant bay, which is undergoing repairs before it can be allocated

This question clearly identifies the very serious issue of accommodation needs and wishes of the Traveller community in the SDCC area. It also highlights the lack of culturally appropriate accommodation, which in turn has led to a serious increase in homelessness and overcrowding on the existing sites. A recent report published by the Irish Traveller movement has stated that Traveller families are 11 times more likely to be homeless and 22 times more likely to be discriminated by land lords through the HAP scheme.

Given the reality of available capital funding and the ongoing and increasing needs of Traveller families in terms of accommodation, especially the increasing challenges of accessing private rented accommodation in the county, Tallaght Travellers Community Development Project are calling on SDCC to both refurbish current and develop new sites that will be culturally appropriate to Travellers needs.

As we previously submitted to the TAP, we would once again like to propose that an additional element be included in the new Traveller Accommodation Programme that specifically addresses the needs of the families currently on the Traveller Accommodation List and that for each year of the life of the programme, one quarter of those families will be identified and targeted for specific accommodation assessment.

Tallaght Travellers Community Development Project would make itself available to work in partnership with the Traveller Accommodation Unit staff team to identify the families considered most in need on the list, consult with them extensively as to their needs, their current circumstances and their preferences in terms of accommodation. Following that process, the Traveller Accommodation Unit in partnership with Tallaght Travellers Community Development Project would discuss the various accommodation options that might be open to the families in question. These options could include Traveller specific accommodation either in halting sites, group housing schemes or standard housing. To ensure a smooth transition to the new Traveller Accommodation Programme 2019-2024, we would propose to identify the first 25 families in the second half of 2019.

We believe that this proposal is a very practical and realistic way of ensuring that Traveller families on the Traveller specific accommodation list are accommodated in a way that builds on the achievements to date of South Dublin County Council. It would also ensure that Travellers are consulted and supported by Tallaght Travellers CDP to

actively participate in decision making in relation to their accommodation needs. For these reasons it is likely to be successful in the long term.

We would like to propose that the Local Traveller Accommodation Consultative Committee include this proposal in the Traveller Accommodation Programme 2019/2024.

Tallaght Travellers CDP support the following recommendations from National Travellers MABS

- We recommend the loan amount on offer from the South Dublin Caravan Loan Scheme be increased to between €15,000 and €40,000.
- We recommend that the South Dublin Traveller Accommodation Programme introduce a caravan rental scheme for families who are not in a positon to finance the purchase of a residential standard mobile homes.
- We recommend that that SDCC provides for supports to families for access to residential standard mobile homes.
- We recommend a fuel efficiency assessment of existing group housing schemes followed by a programme of upgrades to reduce fuel poverty amongst Travellers in South Dublin
- National Traveller MABS recommends the introduction of Ethnic Equality Monitoring into housing services provided by SDCC[2]

[2]Submission to South Dublin County Council Traveller Accommodation Programme 2019-2024

September 2018

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Traveller Health Unit
Eastern Region

Submission to Local Authorities Traveller Accommodation Plans 2019-2024 (August, 2018)

Contacts:
Concepta de Brun, Social Inclusion Specialist
Ronnie Fay, THU Coordinator

Eastern Region Traveller Health Unit

The Eastern Region Traveller Health Unit (THU) covers CHOs 6, 7 and 9 and coordinated by Pavee Point Traveller & Roma Centre. The THU work plan is implemented through regional THU initiatives; 9 local Primary Health Care for Travellers Projects (PHCPs) and a specialist health initiative (Dublin, Wicklow and Kildare). The 9 PHCPs employ Traveller Community Health Workers on a part-time basis and they undertake health advocacy in a range of health arenas (e.g.) mental health, health education; child and infant health; immunization 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 Eastern Region 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.

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Introduction

The Traveller Health Unit in the Eastern Region welcomes the opportunity to make this submission to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2019-2024 in this region. 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 good relations between HSE staff and the local authorities in this THU region in working collaboratively in Traveller inter-agency work over many years.

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

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

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

In this submission, we highlight four keys areas which affect Travellers' health and are existing THU or Government policy which we believe need to be taken account of in the development of the Traveller Accommodation Programme 2019-2024. Namely:

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

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1. TAP delivery and accountability

It is important from the outset to stress the need for TAPs to align with existing policy and legislation, including positive duty obligations[1]; the National Traveller and Roma Inclusion Strategy (2017-2021); and forthcoming National Traveller Health Action Plan (NTHAP).[2] The NTHAP which is currently being developed, refers to (in its consultation document) the role of Local Authorities in addressing health outcomes for Travellers, particularly in relation to environmental health and fire safety.

The consultation document which is comprised of feedback from 4 regional consultations, (including representatives from Local Authorities) concedes that the current structures for Traveller accommodation (i.e.) LTACCs are not effective as they often lack meaningful Traveller representation, are poorly attended and do not have enforcement powers. Further, a consistent message from each consultation was that Local Authorities have not delivered on Traveller accommodation, despite allocated budgets and targets as set out in TAPs. This is clearly reflected in the 2018 figures released from the Department of Housing Planning and Local Government (see Appendix) and the Department's recent report which found that Local Authorities have consistently failed to meet their targets every year since they were made mandatory 18 years ago. This is further compounded by a gross underspend in allocated budgets, with €55 million provided for Traveller housing remaining unspent by Local Authorities since 2000.

The NTHAP consultation document stresses the need for current TAPs to ensure that budgets are spent and that accountability for delivering Traveller accommodation is prioritised through a strong monitoring and evaluation framework.

Recommendations:

- Traveller organisations to nominate representatives to LTACCs; where Traveller organisations do not exist, NTACC to support nominations.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop annual progress TAP reports to monitor progress; reports to be submitted to the Department of Housing Planning Community and Local Government.
- Chief Executive Officers to present annual TAP reports to the Joint Committee on Housing, Planning and Local Government.

[1] 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.

[2] In line with Action 73 in NTRIS, the NTHAP is being developed by the HSE National Social Inclusion Office. A summary document of 4 regional consultations can be found here: https://www.hse.ie/eng/about/who/primarycare/socialinclusion/travellers-and-roma/irish-travellers/national-traveller-health-action-plan.html

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2. Social Determinants of Health

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

The goals of this Healthy Ireland Strategy are to:

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

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

The All Ireland Traveller Health Study (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.

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The AITHS also documented that the majority of Traveller families are now living in standard accommodation (73%) with 18% living in trailers. However, the study indicated that access to a range of public service amenities was poor. Travellers are a very young population with 63% of Travellers under 25 years and a mere 3% over 65 years, the equivalent rate for the general population was 13.3%.[3] The Traveller family is comprised of a married couple with children had an average of 5.3 persons per household compared with 4.1 for the general population. The most recent Census found that the majority of Travellers are living in standard accommodation, primarily by renting from a Local Authority (65.5%). This is met with a sizable decline in Traveller households renting from a private landlord in 2016, a 19% decrease from since in 2011.

However, we note Census 2016 reports the number of caravans or other mobile or temporary structures increased by 10.3% between 2011 and 2016 after falling substantially between 2006 and 2011. This is in the context of overcrowding; with Traveller overcrowding seven times the national rate, this includes the increasing numbers of Travellers living in temporary accommodation; by almost 5% between 2011 and 2016; accounting for 12.2% cent of all Travellers.

Recommendations:

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

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 socialise and congregate together and value immediate and extended family networks. Such 'social capital' is found to be good for your health.

Increasingly Local Authorities are accommodating Traveller families in the private rented sector-either in houses or apartments, with little Traveller specific accommodation provision being built. Lack of security of tenure is another emerging issue for Travellers with an ever-

[3] https://www.cso.ie/en/releasesandpublications/ep/p-cp8iter/p8iter/p8itd/

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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 in reality is unlikely to be met by Local Authorities in the immediate future. Ethnicity is not included as an administrative category (i.e.) similar to nationality, martial details, etc. In the absence of data, Local Authorities are unable to strategically plan for the provision of Traveller accommodation. Other statutory bodies[4] and agencies under their remit, including the Pathway Accommodation & Support System (PASS), have implemented and rolled out an ethnic question ('ethnic identifier') in routine administrative datasets. It is in this context that Local Authorities should follow suit.

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 2016 Traveller families are being squeezed out of the private rental market and are being placed in vulnerable situations, including homelessness. Travellers represent 9% of the homeless population despite only making up 0.1% of the national population. Traveller families, like all families, find this situation very stressful and it is having a negative impact on their health.

There is now a growing recognition in society that mental wellbeing 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 some of the accommodation policies contribute negatively on Traveller health.

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
- An 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] This includes: the Department of Health, HSE, Department of Education and Skills, Prisons, Dublin Region Homeless Executive; Irish Prison Service; Central Statistics Office (CSO); Universities and the Higher Education Authority (HEA); National Drug Treatment Reporting System (NDTRS); Health Protection Surveillance Centre (HPSC); and Pobal

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4. Environmental concerns

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

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

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

Recommendations:

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

5. Traveller Children

Traveller families are larger than those in the general population yet Travellers have fewer rooms in their homes than their settled counterparts (AITHS & Census 2016) 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

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Traveller sites to dual carriageways and the absence of pedestrian lighting; lack of public footpaths or lighting placing young Travellers in danger when walking to school, shops or recreation facilities.

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

The UN Convention on the Rights of the Child protects the cultural rights of children belonging to indigenous and minority groups, including Traveller children. The lack of provision of Traveller specific accommodation and the implementation of the Miscellaneous Provisions Act undermines the rights of Traveller children in exercising their culture and having the opportunity to continue some of their traditions including the right to be nomadic. Dispersing Traveller families throughout Local Authority areas and isolating Traveller children in private rented houses and apartments is undermining of Traveller culture and having negative health impacts manifested in mental health problems, drug addiction and breakdown of families. Poor accommodation is also affecting Traveller children's participation in and outcomes from the education system. In 2016 in its' concluding observations on Ireland the UN Committee on the Rights of the Child recommended that the State "Ensure that sites in which Traveller and Roma households reside are equipped with adequate water and sanitation facilities as well as safe and appropriate recreation facilities for children"; and the State should "Increase the amount of funding allocated for housing facilities that address the needs of Traveller and Roma children and their families; and, provide mechanisms and procedures that ensure the effective and timely use of such funding[5]"

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

[5] CRC, 2016 (/C/IRL/CO/3-4 4, 1st March 2016)

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Appendix: Local Authorities Allocation/Drawdown on Traveller Accommodation 2018[6]

	LOCAL AUTHORITY	ALLOCATION 2018€	Drawdown to date 2018€
1	CARLOW CO. CO.	167,740.00	-
2	CAVAN CO.CO.	30,000.00	-
3	CLARE CO.CO.	853,250.00	13,250.00
4	CORK City Council	310,000.00	-
5	Cork County Council	251,197.00	-
6	DONEGAL CO.CO.	121,800.00	-
7	DUBLIN City Council	1,321,558.39	54,879.69
8	DUN LAOGHAIRE RATHDOWN	673,685.78	-
9	FINGAL CO.CO.	851,189.00	-
10	SOUTH DUBLIN CO.CO.	869,642.50	-
11	GALWAY City Council	176,996.00	-
12	GALWAY CO.CO.	1,080,100.00	36,158.41
13	KERRY CO. Co.	15,350.00	-
14	KILDARE CO. CO.	80,000.00	-
15	KILKENNY CO.CO.	201,682.00	-
16	LAOIS CO. CO.	30,000.00	-
17	LEITRIM CO. CO.	159,614.00	-
18	LIMERICK City& County Council	858,739.00	26,875.00
19	LONGFORD CO CO.	2,922.00	-
20	LOUTH CO.CO.	17,039.00	3,810.00
21	MAYO CO. CO.	30,000.00	-
22	MEATH CO. CO.	65,000.00	-
23	MONAGHAN CO. CO.	400,000.00	29,714.30
24	OFFALY CO.CO.	49,379.00	-
25	ROSCOMMON CO. CO.	230,000.00	102,273.72
26	SLIGO CO. CO.	1,046,095.00	7,656.52
27	TIPPERARY County COUNCILS	25,655.00	38,866.00
28	WATERFORD City & County Council	317,280.00	-
29	WESTMEATH CO. CO.	150,000.00	-
30	WEXFORD CO. CO.	498,801.00	-
31	WICKLOW CO. CO.	209,620.00	19,393.14
	TOTAL	11,094,334.67	332,876.78
	RESERVE	**905,665.33**	

[6] https://www.oireachtas.ie/en/debates/question/2018-07-03/575/?highlight%5B0%5D=kilkenny

Traveller Health Unit in the Eastern Region, Local Health Office Dublin South West, Cherry Orchard Hospital, Ballyfermot, Dublin 10
Tel: 01-620-6300 **Fax:** 01-620-6358

Appendix 2- Membership of the Local Traveller Accommodation Consultative Committee

Cllr. Guss O' Connell (Ind) (Chair)	South Dublin County Council
Cllr. Mark Ward (SF)	South Dublin County Council
Cllr. Louse Dunne (SF)	South Dublin County Council
Cllr. Paul Foley (FF)	South Dublin County Council
Cllr. Kenneth Egan (FG)	South Dublin County Council
Cllr. Mick Murphy (Solidarity)	South Dublin County Council
Patrick Nevin	Tallaght Travellers Community Development Project
Mary Cassidy	Tallaght Travellers Community Development Project
Darren Carpenter	Clondalkin Traveller Development Group
Stephen Brown	Clondalkin Traveller Development Group
Elaine Leech	South Dublin County Council
Gerry Fitzgibbon	South Dublin County Council
Sonia Lavelle	South Dublin County Council
Catriona McKeown	South Dublin County Council

Notes

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www.sourcedesign.ie

www.sdcc.ie
SouthDublinCountyCouncil
@sdublincoco

Comhairle Contae
Átha Cliath Theas
South Dublin County Council