

**Traveller
Accommodation
Programme**

2019-2024

Mid-Term Review

Acronyms/Glossary of Terms

LTACC	Local Traveller Accommodation Consultative Committee
IHREC	Irish Human Rights Equality Committee
CCC	Carlow County Council
TAP	Traveller Accommodation Programme
HAP	Housing Assistance Payment
RAS	Rental Assistance Scheme
AHB	Approved Housing Body
TIG	Traveller Interagency Group
SPC	Strategic Policy Committee
CENA	Culturally Appropriate Homes Limited (AHB) – Cena meaning ‘home’ in Cant

Contents

Introduction	2
Role of Carlow County Council	2
Policy Background for Review.....	3
Irish Human Rights and Equality Commission Act 2014.....	3
Irish Human Rights and Equality Commission Review	3
The Housing (Traveller Accommodation) Act 1998	3
Accommodation Profile	4
Current Accommodation Profile	4
Analysis of Traveller Family numbers by accommodation type	4
Accommodation Types	5
Local Traveller Accommodation Consultative Committee (LTACC).....	6
Evaluation of TAP 2019-2024.....	6
Housing for All	7
Approved Housing Bodies	8
Submissions	8
IHREC Review.....	10
Priority of Allocations	10
Funding.....	11
Recommended Changes to the TAP	11
Appendix 1 – Submissions.....	12
Appendix 2 – Equality Review	14

Introduction

The Housing (Traveller Accommodation) Act 1998 requires that each Local Authority prepare, adopt and implement a new Traveller Accommodation Programme (TAP) to meet the accommodation needs of the county's Traveller community within their functional area for the 5-year period from the date of adoption to the June 30th 2024. The current TAP was adopted by Carlow County Council on 9th September 2019.

The estimated number of accommodation units required to meet the needs of the Traveller Community within the lifetime of the current TAP is 245 housing units. The document sets out the house type requirement that would achieve the number of units required.

The Minister of Housing, Local Government and Heritage requested a mid-term review of the Traveller Accommodation Programme in accordance with the directions issued by Circular 28/2022 and the guidelines for the preparation, adoption and implementation of TAP 2019-2024. An advert was placed in the Local Paper on the 26th July 2022 seeking submissions in relation to the TAP review and the TIG/LTACC were informed of the review process. One submission was received and is detailed in Appendix 1.

Following a review by the Irish Human Rights and Equality Commission received in June 2021, the response to this review, the targets that were set in the current TAP, submissions received and discussions with the LTACC, it was decided a review of the TAP be carried out.

Role of Carlow County Council

Carlow County Council has responsibility for meeting the accommodation needs of the Travelling Community through the adoption and implementation of the Traveller Accommodation Programme 2019-2024. All housing applications will be considered in accordance with the Scheme of Letting Priorities. Applications must be made by means of the standard social housing application form. Advice and assistance will be provided to applicants and/or their representative, if requested by the applicant, to address any difficulties that may arise in completing the application form. In Carlow there are a number of support agencies that are familiar with the social housing application form who can assist and advise. As part of the Social Housing Assessment (Amendment) Regulations 2022, a Traveller identifier question is included in the application form to identify Travellers wishing to be included in Traveller Accommodation Programmes. This will help Local Authorities in the development and review of current and future Traveller Accommodation Programmes.

Policy Background for Review

Irish Human Rights and Equality Commission Act 2014

Carlow County Council is committed to embedding the Public Sector Duty into the work we do, including the administration and operation of the Traveller Accommodation Programme. This involves the Public Sector Equality and Human Rights Duty ('the Duty') is a statutory obligation for public bodies in Section 42 of the Irish Human Rights and Equality Commission Act 2014.

Section 42(1) requires public bodies, in the performance of their functions, to have regard to the need to eliminate discrimination, promote equality of opportunity and treatment of its staff and the persons to whom it provides service and protect human rights of staff and people availing of their services. Section 42(2) requires public bodies to assess, address and report on progress in relation to equality and human rights in their strategic plan and annual reports in a manner that is accessible to the public.

Irish Human Rights and Equality Commission Review

As part of the mid-term review process of this programme, Carlow County Council has taken cognisance of the recommendations of a recent Irish Human Rights and Equality Commission Equality Review carried out on Carlow County Council's current Traveller Accommodation Programme. A full list of the recommendations and reply issued to the review from Carlow County Council is included in Appendix 2.

While the mid-term review process and Traveller Accommodation Programme itself is a target driven delivery model, the Council is committed to working with members of LTACC and relevant agencies in progressing the recommendations outlined by the IHREC.

The Housing (Traveller Accommodation) Act 1998

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

Accommodation Profile

Current Accommodation Profile

As part of the annual estimate of accommodation of Traveller Families, Carlow County Council undertakes a count of the number of families in Carlow and the type of accommodation that each family lives in. Since 2013, the number of families counted has risen by 134.

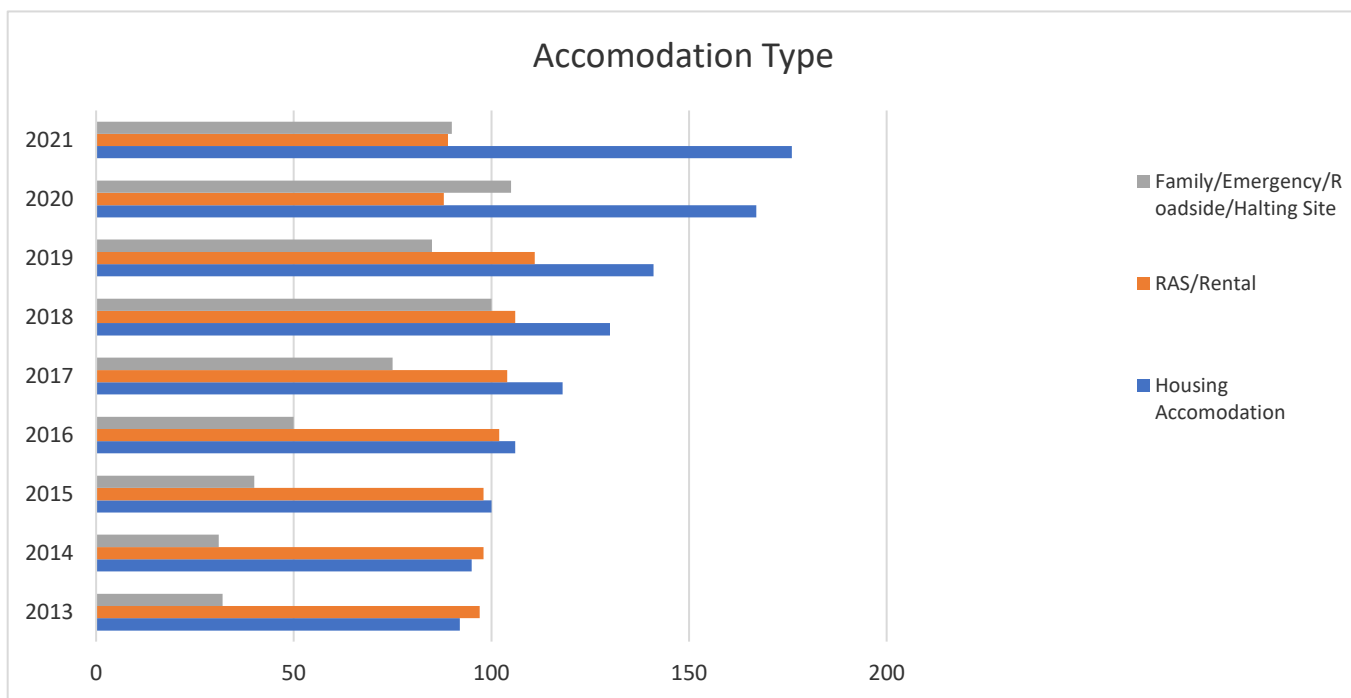
Table 1 – Estimate of Traveller Family numbers

Accommodation Type	2013	2018	2021
Standard L.A. housing	48	70	95
Homeowners	23	31	39
Group Housing	12	13	13
Rural Single Instance	7	7	9
Living with Family	28	77	65
Private Rented	92	104	85
RAS	5	2	4
Voluntary Housing	2	9	20
Halting Sites	3	7	6
Roadside	1	10	10
Emergency Accommodation	0	6	9
Total	221	336	355

Analysis of Traveller Family numbers by accommodation type

Graph 1 below show the annual estimate of Traveller Family numbers from 2013 to 2021. The overall picture shows an almost doubling of the numbers in permanent housing, a relatively stable picture in the rental section over the full period and a doubling of families that are accommodated in shared accommodation/halting sites. Since the publication of the current TAP in 2019 however, there has been a 25% fall in families that are in the rental market. This is in line with the market trend but with the lack of availability of rental accommodation, Traveller families are finding it more difficult to source private rental. Since the publication of the TAP, the count show that Traveller family numbers have increased by 19.

Graph 1 – Traveller Family numbers from 2013 to 2021



Accommodation Types

Carlow County Council has a range of accommodation options including: -

- Standard Local Authority Housing including single instance rural housing
- Traveller Group Housing
- Halting Site
- Specially Adapted Housing
- Voluntary or Co-Operative Housing

There is considerable demand for single instance rural housing in the Travelling Community. The reality in Carlow is that this type of housing is not readily available in the market and that opportunities for acquisitions or construction are limited. The figures presented in Table 1 demonstrate that there has only been an increase of 2 properties in this category since 2013 so expectations around this housing demand need to be tempered.

Rental assistance is also available through the Local Authority HAP and RAS schemes or rent supplement provided by the Department of Social Protection.

Carlow County Council also administers a number of support grants for Local Authority tenants or private home owners (means tested) to enable people to remain in their own homes. The schemes available are: -

- Mobility Aids Housing Grant Scheme

- Housing Aid for Older People
- Housing Adaptation Grant for People with a Disability

Application forms for grants are presented in a Plain English format but supports to help fill out forms are provided by Carlow County Council or through a number of community support organisations.

Local Traveller Accommodation Consultative Committee (LTACC)

The purpose and role of the LTACC is to:

- Advise in relation to the preparation and implementation of the Traveller Accommodation Programme
- Advise on the provision and management of accommodation for travellers, and
- Provide a liaison between travellers and elected members and officials of the Council
- Regularly liaise with and report to the National Traveller Accommodation Consultative Committee

Following the publication of the requirement to conduct a midterm review of the TAP the LTACC met on the 19/07/22 and 13/09/22. An advert was also placed in the local newspaper, circulated to the TIG, elected members and local support groups. Following this consultation, it was decided that amendments to the TAP are required as follows: -

- To take into account the feedback from the Irish Human Rights and Equality Commission
- The targets set out in the TAP to be specific and targeted
- The present difficulties in sourcing private rental accommodation
- A review of the targets/potential/preference for single instance rural housing
- The link between the Housing for All targets and the TAP

Evaluation of TAP 2019-2024

The estimated accommodation needs of Traveller families in the 2019 – 2024 is presented in Table 2. Overall to meet the estimated requirement, 110 units would be required of standard LA/AHB properties with 50 single instance/specific need. The annual targets to achieve this are not prescribed in detail in the TAP rather “Carlow County Council will endeavour to meet these

requirements over the period of the programme. The policy of offering one in ten vacancies to traveller families will continue where appropriate.” Table 3 show the actual number of properties delivered, with 50 over the period which was a particularly channelling period through Covid. On the current trajectory it is anticipated that approximately 80 properties will be delivered over the life of the TAP. As discussed previously the target of 50 rural single instance/specific need is not achievable and detailed work in terms of traveller needs is to be carried out in the next 2 years to examine this target.

Table 2 – Accommodation need identified in the 2019 – 2024 TAP

Type of Accommodation	No of Families
Rural single instance/Specific Need	50
Estate/Group Housing/Voluntary	110
Other/Private Rented/RAS/Lease	80
Halting Site/Transient	5
Total	245

Table 3 – Units Provided 2019 – 2022

	Casual Vacancy	Council Purchase	Halting Site	Long Term Lease	Part V	Voluntary/AHB	Total
2019	4	7	1	0	1	4	17
2020	1	3	0	0	0	2	6
2021	3	1	0	1	0	10	15
2022	3	2	0	0	0	7	12
	11	13	1	1	1	23	50

Housing for All

Housing for All, the Governments Plan for housing until 2030 was published in 2021 and sets the targets for housing delivery over the next 5 years. In total 462 new units are to be delivered in Carlow through the LA and AHB build programmes. Under the one in ten policy, it is anticipated that 18 properties will be allocated to Traveller families where appropriate and where required under the current TAP in 2023 and 2024. Further to this, Chapter 2 of Housing for All states that a Traveller specific new build accommodation pipeline is being developed by Local Authorities and Approved Housing Bodies. It is the objective under the plan that Traveller Specific accommodation will be provided which will add to the number delivered in the build targets. Housing Policy Objective 8 sets out objectives to Increase and Improve accommodation for the Traveller Community

Table 4 – Housing for All Build Targets

Year	2022	2023	2024	2025	2026	Total
Units to be Built	80	90	92	99	101	462

Approved Housing Bodies

Carlow County Council works with a number of AHBs who deliver housing through various Government funding programmes. The annual count of Traveller families demonstrate the increase in families that are accommodated by the voluntary sector. Carlow County Council with the nomination rights to AHB schemes ensure that the one in ten policy, where appropriate and required is applicable in new build schemes.

In the past couple of years Carlow County Council have started working with CENA who look at delivering culturally appropriate Traveller specific accommodation. 5 units have been delivered in the past year and CENA have spoken with many Traveller families about accommodation preferences. Some of this discussion looked at group housing projects. There is a commitment also to look at Bestfield and ascertain what the best ongoing uses of the site will be.

Submissions

One submission was received for the TAP review from St Catherine’s Community Service. A summary of issue in included with the full submission in Appendix 1.

Issue	Response
The commitment to providing Traveller specific should be stronger with specific and higher targets for Traveller specific accommodation, namely group housing and transient bays.	Carlow County Council have a strong target for delivery of accommodation for Traveller Families. Together with the delivery programme Carlow County Council have worked closely to source Traveller Specific accommodation and examine possibilities around group housing.
The plan needs to acknowledge working with AHBs that work on sourcing and providing Traveller Specific Accommodation. In particular the issue of well-planned group	This report details significant work completed with AHBs since this TAP commenced.

accommodation needs to be examined in consultation with Traveller families.	
The need to provided transient site, in particular for visiting families need to be examined. Traveller families have indicated no objection to transient sites but don't wish these to become permanent accommodation solutions.	The issue of Transient site is one that arise at the LTACC. Further discussion and research in this matter is required.
Private rental is indicated as a solution for 80 families in the Plan. The private rental market has become unobtainable, in particular for traveller families.	Private rental is a nationwide issue at the moment. While challenging, there are still rental opportunities that are being availed of. Other measures being introduced at Government level to protect rental tenancies are welcomed. Measures to source alternative accommodation in Carlow are continually assessed.
The target for single instance rural accommodation is welcome but appears to be unobtainable. The resultant shortfall needs to be made up	The issue of single instance rural accommodation has been raised continuously at LTACC as being an issue. The expectations around delivery of single rural single instance dwelling needs to be realistic and further surveys of accommodation needs, need to be undertaken before the next TAP.
The allocation system is unclear. Families feel frustrated and they have no point of contact to discuss frustrations.	Allocations are completed in accordance with the Councils scheme of letting priorities and the allocations scheme 2021 -25. This report outlines the priority of allocations and this needs to be adhered to, to deal with the most urgent situations first.

The submission also highlights issues raised in the IHREC review which are dealt with separately in this report

IHREC Review

The IHREC review, management response and current status of issues is detailed in Appendix 2. There are a number of issues that are to be dealt with as part of this review, some have already been implemented at either National or Local level and some of the issues raised are being discussed and agreed at Local Level.

Priority of Allocations

- Displacement from dwellings deemed to be dangerous in accordance with the Sanitary Services Act, 1964 or being displaced by operation of Carlow County Council
- Applicants who are homeless as defined in the Housing Act, 1988 ^{Note 1}
- Applicants living in unfit and overcrowded conditions as defined in the Housing Act 1966
Note 2
- Applicants in need of housing on disability, medical, compassionate or similar grounds
- Applicants who share accommodation with another person or persons and who, in the opinion of the housing authority, have a reasonable requirement for separate accommodation
- Approved applicants not included in any of the categories above who have been assessed and approved for social housing support

The Council may, at its discretion let a dwelling to any applicant having regard to the length of time the applicant has been included in the Council's housing needs assessment within the specific household category.

In accordance with the terms and conditions of the allocation scheme, an allocation may not be considered if there are breaches of the Anti-Social Behaviour Policy, a tenancy abandonment, tenancy surrender, eviction, rent arrears or evidence of damage to a property in a previous tenancy.

Note 1: - Entry into temporary emergency accommodation does not guarantee exit into a social tenancy. The likely exit route is through rental or own front door temporary accommodation.

Note 2: - This would include Roadside Accommodation which is deemed unsuitable.

Funding

The capital provision for Traveller specific accommodation identified in TAP 2019-2024 will be sourced from the Department of Housing, Local Government and Heritage under the various Annual Capital Funding schemes.

Recommended Changes to the TAP

- The numbers of units to be achieved for 2023 and 2024 are: -

	Build/RLS	Traveller Specific	Casual Vacancy	Single Instance Rural/Purchase	Private Rental	Total
2023	9	4	2	2	5	22
2024	9	4	2	2	5	22

- The term indigenous will be removed and housing applications will be assessed in accordance with Regulation 6 of the Social Housing Assessment Regulations 2011
- The target for 50 single instance rural will be revised downwards to reflect the current market and property availability
- A system will be introduced to record and track private rental allocations availing of HAP
- The number of private rental targets is to be revised to reflect the market
- Implementation of the Public Sector Equality and Human Rights Duty
- Provision of intercultural awareness training for staff and examining training need in around the TAP
- The number of allocations etc and an update of targets will be provided to the LTACC
- Carlow County Council will work closely with agencies including Carlow County Development Partnership in social exclusion and community activation, in particular in new allocations and estate management
- A representative from a Traveller organisation will be invited to sit on the disability steering group to represent the need of Traveller families
- The requirement of a transient site will be re examined through discussion wit Traveller families, representative organisations and findings in other areas
- Greater collaboration will be carried out between Travellers, Traveller organisations and the Council in completing the annual count of Traveller families.

Appendix 1 – Submissions



St. Catherine's Submission to the Mid Term Review of the Traveller Accommodation Plan 2019 - 2024

St. Catherine's Community Services Centre works directly with the Travelling community in Carlow through our Traveller Community Development and Family Support, Men's Health and Primary Healthcare and Traveller Women's Awareness programmes. We also manage the Development Worker for the Carlow Traveller Forum. Family support and improving health outcomes for the Traveller community is the principle aim of St. Catherine's Traveller programmes.

Access to reliable and quality accommodation is identified as a key determinant of health in the All-Ireland Traveller Health Study and has a huge impact on family relationships. Therefore, improvements in this key area, as identified in the Study, are required to address the huge inequalities in health outcomes for Travellers when compared with the general population.

The Challenge

The housing situation for Travellers in Carlow remains very serious. Based on the Council's Traveller count for March 2022, 85 or 24% of the 355 Traveller households in Carlow were living with family (usually in overcrowded accommodation), on the roadside or in emergency accommodation. While this figure is an improvement on the 28% of households (93) in the December 2018 count it still means 1 in 4 Traveller households in Carlow do not have secure, long term accommodation.

This was acknowledged in the "Homelessness in Carlow 2018" report by Dr. Brendan O'Keefe. It stated "members of the Travelling Community are the most at risk of being homeless – while they represent less than 1 percent of the Irish population they make up 9 percent of the homeless population".

Our Submission

1. We welcome the commitment to providing Traveller specific accommodation on page 7 but we believe this commitment should be stronger with specific and higher targets for Traveller specific accommodation, namely group housing and transient bays. It is important the TAP differentiates the need of transient sites for those who are travelling or staying in Carlow for a short period of time and those in need of permanent accommodation solutions.

2. The Plan needs to be updated to reflect the work done with CENA, the Traveller led approved housing body (AHB) and be open also to other AHB's that involve the Travelling community in the planning, design and management of Traveller specific accommodation. A number of the families we work with have expressed a preference for Traveller specific accommodation, particularly small group schemes where the scheme is well planned and managed and the families are involved. This is similar to the sentiment expressed by the family mentioned on 9 of the draft TAP.

The Plan states on page 8 that “. the current assessment of housing need indicated there is no preference for group housing”. In our experience the opposite is the case when there is a commitment to planning and engaging the Travelling community. Travellers do however not wish to be housed on group schemes where this is not the case and many would refer to unsuccessful schemes and halting sites when this issue is discussed.

3. The Plan acknowledges the need for transient sites separate from existing halting sites or group housing on page 10. However, the target in the Plan is too low. Prior to Covid there were a number of families that visited Carlow during the Summer months that received eviction notices from roadside locations. This caused considerable stress for the families involved given there were no transient site to access. The Gardai have also raised this issue at the Carlow Traveller Interagency group.

On the comment on page 10 that families questioned do not want transient bays in the county we believe from speaking with some families that very few families would object to transient bays for families travelling around. There may be a fear though that these sites could be converted into permanent accommodation down the line and end up being poorly managed. Families are very clear that they do not want to live in this kind of situation.

4. The Plan has a target of providing 80 more families with accommodation in private rented or RAS accommodation. We believe this is more unobtainable now than it was in 2019 given the current rental situation. The Traveller count recorded 107 households renting in 2019. The most recent figures saw a fall to 85 households. Private rented has almost become unobtainable to Traveller families due to rent increases, discrimination and the reluctance of landlords to rent to Travellers.

5. The target for rural single instance housing/special need is welcome as this is the preference for many Traveller families we work with. However we believe the target may be unrealistic. This is acknowledged in the Plan that states “.it may be unlikely that the Council will get the resources.” to purchase them. In this case the shortfall in planned delivery needs to be made up in the other accommodation types.

6. The allocation system for housing stock remains unclear. Families report feeling frustrated that the process of assessing their housing need is not transparent and there is no clear pathway of communication to discuss individuals housing needs, in particular those in need of emergency accommodation.

Carlow County Council also agreed to implement a number of the recommendations from the Irish Human Rights and Equality Authority that arose from the Equality Review carried out by the Council on Traveller specific accommodation in 2021 in the Mid Term TAP Review. These include:

1.a - Detailed information on the assessment of Traveller accommodation needs and preferences

1.f – Raising the issue of including an ethnic identifier on the standard housing application form with the Department

1.g – Removing the indigenous requirement

1.k – Implementing the Public Sector Equality and Human Rights Duty

2. Discuss with the Department revisions to the housing application form to include an ethnic identifier and include a list of Traveller specific needs/interests
3. More transparency on the methodology in the annual count as per 1a
4. Resources to employ a Traveller Liaison Officer in the Council

Appendix 2 – Equality Review

Issues Raised	Management Response (27 th August 2021)	Action in TAP
1) <i>Address policy and procedures for:</i>		
a) <i>Presenting data in the TAPs and progress reports in particular: providing detail on the process for assessment of Traveller accommodation needs and preferences in the administrative area; and providing a breakdown, by accommodation type, for accommodation targets and outputs;</i>	<p>Carlow County Council will continue to comply with the legislation, guidelines, Ministerial Directives and regulations in relation to Social Housing Assessments, Summary of Social Housing Needs and the preparation of a Traveller Accommodation Programme. The relevant legislation and guidelines include the Housing (Miscellaneous Provisions) Act, 2009, the Housing (Traveller Accommodation) Act, 1998 and Circular 35 of 2018 in relation to the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2019 - 2024.</p> <p>As part of the housing needs assessment interviews are carried out by the Council's Social Worker where applicants have the opportunity to identify their preferred accommodation options and this process will continue in the future. When carrying out the review of the TAP the Council will endeavour to meet again with each applicant to ascertain their accommodation preference.</p> <p>Carlow County Council accepts this recommendation, and it will be implemented as part of the next TAP review.</p>	Commitment to revise
b) <i>Tracking and independently verifying the preferences of the Traveller community in relation to type of accommodation and ensuring a respect for</i>	Carlow County Council will continue to act in accordance with the current legislation, regulations, guidelines and Ministerial Directives in relation to identifying the accommodation preferences of the Traveller Community.	Ongoing The social housing application has changed since the review and a Traveller identifier is

<i>Traveller culture and identity in meeting these;</i>		now on the form.
c) <i>Establishing appropriate processes for Traveller participation in estate management on Traveller-specific accommodation;</i>	Carlow County Council will continue to engage the services of CENA approved housing body, St Catherine Community Services and staff of the Council in relation to pre-tenancy courses and estate management issues.	Ongoing – Potential strengthening of TLO being assessed subject to budget
d) <i>Identifying and responding to the practical implications of the recognition of Traveller ethnicity, for the provision of standard housing including in relation to supporting and sustaining integrated communities;</i>	The Council, in providing standard housing, has to meet national and departmental guidelines. The Council puts significant resources into developing and sustaining communities throughout the county through Housing and Community Development Programmes such as SICAP, Sports Partnership, Healthy Carlow, Community and Environmental grants. The Council provides a range of supports through its work with the LTACC, SICAP (Social Inclusion and Community Activation Programme), Sports Partnership Initiatives, Carlow's Pride of Place and North/South Co-operation Pride of Place Competitions, Men's Sheds, as well as direct support from the Housing Department in the form of Tenant Liaison Services and Social Work Services.	Ongoing
e) <i>Identifying and developing culturally specific responses to the needs of Travellers experiencing homelessness,</i>	<p>The level of homelessness among travelling families in Carlow is low in comparison to the settled community. Currently only 5 travelling families are accommodated in private emergency accommodation as opposed to 17 families from the settled community. These families will be provided with support from the Council's Social Worker, Homeless Support and Prevention worker, Homeless Co-Ordinator, Housing First in place, Focus Ireland who provide tenancy support services and advice and information and START Carlow Mental Health Services, HAP Placefinder and other housing staff. Their cases are also presented and reviewed on a regular basis at the Carlow County Council Homeless Action Team Meeting (HAT).</p> <p>The Council are provided with a standard housing application form for social housing supports from the Department, which are provided for in statute and regulation. The provision of an ethnic identifier on this form is a national issue and the Council will raise this matter with the Department, outlining the advantages of same.</p>	Section 10 grant funding has been approved for a homeless coordinator. This will strengthen the homeless team and specific additional supports can be targeted at travellers at risk of homelessness.

<p>f) <i>Tracking the experiences of the Traveller community in seeking to secure accommodation in the private rented sector and addressing the issues identified;</i></p>	<p>This currently is not within the remit of the local authority sector (apart from private rented inspections). The regulation of the private rental sector is a function of the Residential Tenancies Board. In relation to the issue of discrimination, responsibility rests with the Equality Commission.</p> <p>Any move by the local authority to track the experience of the travelling community or to address any issues identified in the private rented sector should be addressed nationally in conjunction with the Department. Changes in the current remit of the local authority would have to be matched by funding and resources</p>	<p>Support and advice available through the Council and community support organisations.</p>
<p>g) <i>Reviewing the provisions in relation to "indigenous Travellers", and the local connection requirements to access housing supports, so that as per its stated intention, the section relating to the "indigenous requirement" will be removed from the TAP 2019-2014 when it is reviewed during 2021</i></p>	<p>This issue will be dealt with as part of the TAP review</p>	<p>Housing applications will be assessed in accordance with Regulation 6 of the Social Housing Assessment Regulations 2011.</p>
<p>h) <i>Establishing and developing a response to the needs of Travellers who are nomadic within and throughout the county through the provision of transient halting site bays;</i></p>	<p>The number of transient/nomadic families and unauthorised sites recorded in Carlow over the recent past would not indicate a need for a transient halting site in the county and during the preparation of the current TAP members of the travelling community indicated that they had not a preference for transient halting sites.</p> <p>The Council has accommodation with sanitary facilities available for 10 no. caravans at the Council's halting site at Bestfield, Athy Road, Carlow. It is the experience of the Council that estate management issues can arise when different families are required to share the one transient site</p>	<p>There has been no expressed demand for a transient bay recorded since the review. Carlow County Council continue to monitor the situation. A review of Bestfield is due in 2022/23</p>
<p>i) <i>Identifying and responding to the imperative of an informed and empowered participation by Travellers on the LTACC through capacity -building or</i></p>	<p>St Catherine's Community Services currently provide support and capacity building to participants on the LTACC. However further training, learning and development options are being examined</p>	<p>The TIG coordinator has applied through dormant accounts funding for additional training budgets in support of capacity building</p>

<p><i>support for local Traveller organisations to play a role</i></p>		
<p><i>j) Identifying and responding to specific needs of Travellers that flow from their distinct culture and identity, particularly in relation to horse ownership.</i></p>	<p>The Council's statutory duty is to provide housing accommodation in accordance with relevant legislation and guidelines. The provision of ancillary services is a matter for the Council working in partnership with other stakeholders.</p>	<p>The Council will continue to engage with stakeholders in this matter.</p>
<p><i>k) Implement the Public Sector Equality and Human Rights Duty in the next review of TAP</i></p>	<p>The Council is committed in its Corporate Plan 2019 to 2024 to implementing the Public Sector, Equality and Human Rights Duty and this will be implemented in the next review of the TAP</p>	<p>Commitment to implementation in TAP Review</p>
<p><i>2) Establish and implement an ethnicity Identifier in data gathering and analysis in relation to the provision of social housing and homelessness services and include all Traveller-specific accommodation options in housing applications (i.e. allow applicants identify themselves as a member of the Traveller community if they wish and for the sole purpose of identifying accommodation needs and include a list of needs/preferences any or all of which may be ticked, including, but not limited to permanent/transient halting site, group housing, outdoor space for dogs/horses and preference to be accommodated close to family members).</i></p>	<p>Local Authorities are provided with a standard application form for social housing supports from the Department, this form is prescribed by regulation. The provision of this ethnicity identifier on the housing application is a national issue and should be addressed in consultation with the Department. The Council undertakes to discuss the matter with the Department, outline the benefits of same and to request that the ethnicity identifier be added.</p> <p>The current application form for social housing supports includes options for a range of traveller specific accommodation, Part 6 and Part 8 of the application provides for Group Housing/ Halting Sites. It does not include the options for the provision of space for dogs and/or horses. Local authorities must comply with national regulations and guidelines in the provision of accommodation/housing. At a time when resources are limited the provision of such should again be agreed at National Level in consultation with the Department, other issues may arise including animal welfare which need to be addressed.</p>	<p>As part of the Social Housing Assessment (Amendment) Regulations 2022, a Traveller identifier question is included in the application form to identify Travellers wishing to be included in Traveller Accommodation Programmes</p>

<p>3) <i>Develop a more transparent recording of the methodology of collection and data obtained in the annual count of members of the Traveller community (for example by survey, setting out the steps taken to ensure all members of the Traveller community were reached and including such questions as multiple accommodation preferences and difficulties in accessing such preferences or other accommodation in the past).</i></p>	<p>The Department has collated the annual count of Traveller Accommodation by Local Authorities since 1995. The count includes the number of Traveller families accommodated by local authorities in Traveller specific accommodation as well as in mainstream housing, the number of Traveller families living on the roadside, as well as the number of Travellers who privately source accommodation.</p> <p>The annual count of members of the Traveller Community is not an assessment of need for housing accommodation. Such assessments are carried out in accordance with the relevant Housing legislation.</p> <p>The Council will document the methodology used to collect data for the annual count and will adopt the policy and procedure that are outlined in recommendation 1(a) above for the 2021 count and all future counts.</p>	<p>For the TAP review and the 2022 count, the Council are looking at more engagement with community services and directly with Traveller families.</p> <p>There is a concern that a survey may not have the desired reach.</p>
<p>4) <i>Consider the possibility of employing a Traveller Liaison Officer in addition to a Tenant Liaison Officer, consider the possibility of employing a Traveller Liaison Officer, who should have a drop in or phone clinic by walk members of the Traveller community can voice any concerns it may have in respect of their accommodation directly. The officer could also make efforts to engage with members of the Traveller community on any other issues arising. They could also assist with online applications where members of the Traveller community have no access to the internet. They should have regular meetings with members of the Council mandated with housing issues to ensure regular feedback on accommodation issues raised by members of the Traveller community.</i></p>	<p>The Council provides significant supports to members of the travelling community in assessing their accommodation preferences, enabling access for Travellers to Housing Services and to support delivery of targets in relation to Traveller specific accommodation.</p> <p>The members of the traveller community have access to a Social Worker, Traveller Caretaker Tenant Liaison Officer, HAP Placement Finder, Homeless Support and Intervention Worker, Members of the LTACC and Carlow Traveller Inter Agency Group, Housing Personnel & Elected Members in relation to applying for accommodation and sustaining their tenancies. This support is further enhanced with the cooperation between Carlow County Council staff, St Catherine's Community Services and the Traveller Health unit in the HSE. To further assist the travellers in securing appropriate accommodation it is within the remit of the Social Worker to make recommendations on allocations to the Senior Executive Officer, Housing. It is also within the Social Worker's remit to assess persons presenting as homeless and to direct the provision of</p>	<p>The Council are looking at strengthening the TLO service in the 2023 budget, to look at proactive tenancy support for all tenants. Subject to budget approval these additional supports would be available to assist the travelling community, particularly in new tenancies.</p> <p>Carlow County Council also works closely with Carlow County Development Partnership and the SICAP in new communities.</p>

	<p>emergency accommodation where appropriate.</p> <p>All travellers have direct access through phone calls, interviews, on-line and customer service areas to Housing Personnel. They also have unlimited access through the LTACC and St Catherine Community Service.</p> <p>Carlow County Council currently have one Tenant Liaison Officer for approximately 1875 houses. The Council does not agree with the recommendation of the appointment of a Traveller Liaison Officer as the current structure is more inclusive and integrated. However, if additional resources become available the Council will examine the recruitment of an additional Tenant Liaison Officer. Traveller tenancies account for less than 6% of all tenancies</p> <p>Drop in or phone in clinics are already available to the Traveller Community and is a significant portion of the work carried out by the Social Worker, HAP Place Finder, Tenant Liaison Officer & Housing Staff in general</p>	
<p>5) <i>Engage the services of an appropriate independent body, for advice on creating a tailored solution to particular accommodation needs where necessary</i></p>	<p>The Council are currently collaborating with CENA in this matter.</p>	<p>The Council and CENA have identified a number of properties for families under CAS funding.</p>
<p>6) <i>Adopt a broad equality policy incorporating discrimination on all prohibited grounds and all staff should receive training on this policy</i></p>	<p>The Council is committed to the Equal Status Policy and the need to eliminate discrimination and promote equality of opportunity and treatment of persons to whom it provides services to and their human rights.</p> <p>Intercultural Awareness Training is offered on an ongoing basis from St. Catherine's Community Services Centre in Carlow which is attended by staff from Carlow County Council and facilitated by members of the traveller community.</p>	<p>The Council has committed to ongoing training and has received funds under dormant accounts funding to assist with same.</p>