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TRAVELLER ACCOMMODATION PROGRAMME

2025 -2029

WICKLOW COUNTY COUNCIL

Being the Relevant Housing Authority under

The Housing (Traveller Accommodation) Act, 1998.



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Introduction

Legislative Background:

The Housing (Traveller Accommodation) Act 1998 came into effect on the 10th September 1998. The primary purpose of the Act is to provide a comprehensive legislative framework which requires housing authorities to meet the accommodation needs of Travellers normally resident within their administrative areas.

Under the provisions of the Traveller Accommodation Act 1998, Wicklow County Council is required to prepare, adopt and implement a new Traveller Accommodation Programme¹ (TAP) to meet the accommodation needs of the County's Traveller community, i.e. those families who have been resident in the county for at least three years prior to the adoption of this proposed plan for 2019-2024 and who are on the Council's list for Social Housing Support.

The existing programme which took effect on the 01st July 2019 will expire on 30th June 2024. The new Traveller Accommodation Programme will cover the period from 1st January 2025 and will expire 31st December 2029.

The Minister for Housing has issued a number of directions under the Act in relation to the preparation of the new TAP and these are contained in Circular 46/2023 together the "Guidelines on the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025-2029."

The Guidelines covers the various provisions of the 1998 Act which govern the housing authorities' duties in relation to preparation, adoption and implementation of accommodation programmes and related matters. These provisions: -

- Require relevant housing authorities, in consultation with Travellers, to prepare and adopt by a date to be specified, accommodation programmes to meet the existing and projected accommodation needs of Travellers in their areas;
- Allow for public input to the preparation and amendment of such programmes;
- Oblige relevant housing authorities to take appropriate steps to secure implementation of programmes; and

¹ Throughout this document, reference to be made to LTACC i.e. Local Traveller Accommodation Consultative Committee

- Require planning authorities to include objectives concerning Traveller accommodation in their county/city development plans.

The Circular, Memorandum and Schedule are set out in full in Appendix 1.

Wicklow County Council is required to prepare and adopt a new Traveller Accommodation Programme for the period from 1st January 2025 to 31st December 2029.

Policy Statement

Wicklow County Council's Housing Policy states that its aim is 'to facilitate the provision of sustainable, high quality social, affordable and cost effective housing accommodation to meet the existing and likely future needs responsive to the requirements of all categories of persons in the County'.

This is Wicklow County Council's sixth Traveller Accommodation Programme. It reaffirms our commitment to the provision of high quality accommodation for members of the Traveller community who are eligible for social housing support in our administrative area.

Wicklow County Council recognises Travellers' identity as an indigenous minority ethnic group and strives to accommodate Travellers in a culturally appropriate way. There is a commitment by this Council to meet our obligations under the Irish Human Rights and Equality Commission Act 2014- the Public Sector Duty Section 42 (1) and the Equal Status Acts 2000-2018.

Wicklow County Council's statement on equality for this Plan -

"Our Traveller Accommodation plan is guided by the principles of equality and non-discrimination. We are committed to providing equitable access to accommodation for all members of the Traveller community, ensuring that their specific needs are met. We will continue to work in consultation with Travellers and Traveller representatives to identify suitable housing options and address any arising issues".

It is the policy of Wicklow County Council, within the resources available, to provide group and standard housing options as well as halting sites for the accommodation of Travellers who are on the list for Social Housing Support with Wicklow County Council, in accordance with the Assessment of Need carried out under the Traveller Accommodation Act.

Traveller accommodation will be managed on the same basis as Wicklow County Council's policy for the maintenance and management of all its housing stock, with specific regard to Wicklow County Council's Tenancy Agreement and Anti-Social Behaviour Policy.

It is the objective of Wicklow County Council to ensure that practical and appropriate fire safety measures are applied to contribute to preventing loss of life and serious injury in Local Authority Traveller Accommodation.

Travellers, who present as homeless will be afforded the supports of Wicklow County Council's Homeless Service, within the strategic context of the Mid East Region Homeless Action Plan 2024-2029.

The Local Traveller Accommodation Consultative Committee (LTACC)

The role of the Local Traveller Accommodation Consultative Committee is to provide a forum where Traveller Accommodation issues can be addressed in a timely and co-ordinated manner and where decisions are reached in as far as possible on the basis of mutual consensus. Membership of the LTACC consists of Traveller, Traveller Development Groups, Elected Members of Wicklow County Council and Council staff.

The LTACC is integral to the consultation process regarding Traveller accommodation. It ensures accountability and facilitates communication with the Traveller community. It plays a key consultative role in the provision and management of Traveller accommodation within our County.

At the LTACC meetings updates and progress reports on the TAP are provided to the committee. The members of the LTACC are contained in Appendix 4 to this document.

County Wicklow Administrative Area

County Wicklow is located in the province of Leinster, and has a population of 155,485, 9.2% growth persons as stated in the preliminary 2022 census figures on the CSO.

Wicklow shares its border with four other counties and has a total land area of 2,027 km². The topography of Wicklow is largely mountainous, with the Wicklow Mountains being the largest continuous upland region in Ireland. Wicklow is the 13th largest of the Republic of Ireland's 26 Counties and is the 14th largest Local Authority area in terms of population.

Wicklow County Council is the Local Government Authority for County Wicklow and is responsible for the delivery of the full range of services. Wicklow County Council seeks to enhance the county's attraction as a place in which to invest, work, and live, and takes the lead role in shaping the strategic vision of the county. It provides a diverse, multi-layered and evolving range of services to both citizens and visitors to County Wicklow, which include the provision of housing, planning, development, environmental, roads and traffic, leisure and community services. It also has an enhanced role in leading out economic and community development in the County. The Council works in partnership with other state, public and private bodies in the delivery of critical infrastructure and shared services.

Wicklow County Council has an elected body comprising of 32 elected members.

Since the implementation of the Local Government Reform Act 2014. County Wicklow has 5 Municipal Districts which are:

- Arklow
- Baltinglass
- Bray
- Greystones
- Wicklow

County Wicklow Municipal Districts



Overview

The table below gives an overview of total numbers of Travellers accommodated both in terms of social housing and in terms of owner occupation, as of November 2024, when the Annual Count of Travellers was conducted.

Details	Co. Wicklow
Number of Traveller families	296
Number of Traveller families accommodated by or with assistance from Local Authority (Includes standard housing, halting sites both temporary and permanent, group housing, tenant purchase, voluntary housing)	171 (standard or group housing) 18 (Halting Sites) 4 (Basic Serviced Sites) 11 (Sharing Houses) 9 (Sharing Bays) 17 (Unauthorised Sites) 2 (Other State Supported Accommodation)
Number of Traveller families in private rented / RAS/HAP houses	4
Number of Traveller families in owner occupation	9

A decrease in numbers of families in Private Rented accommodation was noted with the according increase in numbers of roadside families, and those in shared and emergency accommodation. This is indicative, overall, of the current Housing Crisis and lack of supply.

A Social Worker is specifically employed by Wicklow County Council to provide ongoing supports to Traveller families in respect to their accommodation needs and vital linkages with health and welfare services. This service was afforded to Traveller community during the lifetime of the plan and will continue into the next TAP.

Progress Achieved during the Traveller Accommodation Programme 2019 -2024

During the lifetime of the Traveller Plan 2019 - 2024, the following units of accommodation were provided by Wicklow County Council being the relevant local authority as per the Traveller Accommodation Act 1998:

	Standard Housing	Traveller Specific Accommodation (specially built to include Group Housing, halting sites and once off single site)	Total
Bray Municipal District	10		10
Wicklow Co. Co.	35	3	38
Total	45		48

Other initiatives undertaken during the lifetime of this plan include:

Fire Safety

The fire safety program is conducted annually across all Traveller halting sites and Traveller group housing. During this program, smoke detectors and CO2 alarms are tested to ensure they are operational, and fire extinguishers are serviced. Fire blankets installed where required. Additionally, this year marks the introduction of fire safety demonstrations to further enhance awareness.

Significant Refurbishments of Individual Traveller Houses

Funding was secured from the Traveller Accommodation Unit to address a number of refurbishments of Traveller designated houses throughout the county. These included the addition of extensions to alleviate severe overcrowding/address medical/disability as well as general refurbishments. In all cases, this funding was granted on the basis that these houses remain Traveller designated houses going forward.

Ballinteskin Development Completed 2024



Basic Serviced Sites

Rocky Valley, Kilmacanogue – Completion of the installation of a modular home at this site.

Windgates, Greystones – Electricity supply improved

Vale Road, Arklow (2) – Extensive refurbishment completed.

Traveller Accommodation Programme 2025 - 2029

This Traveller Accommodation Programme 2025 - 2029 aims to meet the level of need identified within this programme whilst also recognising the resource constraints that currently exist nationally. Additionally, this Programme recognises that as with the previous TAP for Co. Wicklow, the general trend in terms of accommodation need, is for standard social housing. Whilst Traveller specific accommodation will be provided where possible, the main source of accommodation units over the lifetime of this plan will be standard social housing.

Assessment of Traveller Accommodation Need 2025 - 2029

Under Section 6 of the Traveller Accommodation Act 1998 and as amended by Section 21 of the Housing (Miscellaneous Provisions) Act 2009, an Assessment of Needs has been conducted by Wicklow County Council. The Housing Needs Assessment process of 2018 has formed a central part of this assessment.

Those involved in this assessment of need include:

- Wicklow County Council's Social Worker
- Traveller families
- Bray Traveller Community Development Group
- Wicklow Travellers Group

Assessment of Demand for Accommodation for Travellers 2025-2029

The assessment of needs was carried out by CEART, Primary Care, and Bray Travellers Community Development Group, in conjunction with Wicklow Co Council's social worker. This assessment was conducted over a number of months. Travellers interviewed and discussed with other Travellers, and there were several meetings with Wicklow County Council. We are thankful and appreciative of the comprehensive input from the Traveller groups, which has been invaluable in conducting this assessment.

It was noted that in the north of the county, there is a high incidence of single men requiring accommodation. These individuals often have complex needs that will require special consideration in the accommodation plan.

The assessment was carried out on 60 families –

37 families currently in mobile homes sharing halting site bays, in yards, outside family homes:	
Traveller specific accommodation:	10
Traveller specific accommodation in their current location:	18
Standard housing:	9
3 families currently in private rented/HAP/RAS:	
Standard housing:	3
11 families currently sharing houses:	
Standard housing:	11
9 families currently homeless:	
Standard housing:	9
TOTAL FAMILIES	60

Over the life time of Wicklow’s five-year **Traveller Accommodation Programme 2025- 2029** plan it is anticipated there will be approximately 53 units delivered. The proposed accommodation targets are spread throughout the Municipal Districts as follows:

	Standard Housing	Traveller Specific Accommodation (specially built to include Group Housing, halting sites and once off single site	Total Units of Accommodation Required
Arklow MD	5	8	13
Baltinglass MD	5		5
Bray MD	10		10
Greystones MD	10		10
Wicklow MD	15		15
Total	45	8	53

A number of proposals in terms of Traveller Accommodation policy in Co. Wicklow have been considered for inclusion in this TAP. These proposals include:

- The quota system in terms of Traveller accommodation allocation policy is 1;16 ratio
- It is proposed that if a Traveller family leaves a house, it will be where possible reallocated to a Traveller family.

Proposed New Developments

	No. of Units	Proposal	Timeline
Arklow MD	3	3 housing units/ Group housing in Rathdrum due to be complete in January 2025.	Q1 2025
Barndarrig	3	Development of three new Traveller-specific units alongside 17 social housing units.	2026/27
Arklow MD	4	Development of a small Group Housing Scheme in vale road 2 housing units and one permanent halting bay to service up to 2No. mobiles.	2026/27
Countywide		Consider Group Housing developments in MDs where land is available.	2025-2029

Proposed Improvements

Existing Development	No. of Units	Proposal	Timeline
Rocky Valley Cottage	1	Retro fit upgrade to existing detached cottage	Q1 2025
Drumkay	4	Retro fit upgrade to 4 existing Group Housing units	Q2/3 2025
Blackberry lane	1	Upgrading existing accommodations and site access, with associated site works, including the provision of external laundry facilities.	Q1 2025
Arklow MD Vale Road		Provision of onsite bathrooms and hard standing base for a new mobile home.	2025
Windgates/Halfmoon	4	Re surfacing of hating site and associated site works	2025
St Clares		Installation of Playground facilities for communal use	Q1 2025
Cooldross close		Installation of Playground facilities for communal use	Q1 2025
St Clares Halting site		Retro fit upgrade to existing day units	2027/28
Ballinteskin Halting site		Retro fit upgrade to existing day units	2027/28

Other

Existing Development	Proposal	Timeline
Ballinteskin Halting Site	2 units – extension of 2 no. day units to include bedrooms, on units 5 and 7	2025
All	Fire Safety Works	Ongoing

As the Council's building programme will continue to deliver Social Housing over the lifetime of this plan, the suite of accommodation options that can be provided by Wicklow County Council includes:

- Traveller Specific Accommodation
- Standard Social Housing – allocation of Casual Vacancies as they arise
- Voluntary Housing options
- RAS/Leasing options
- Assistance in sourcing Private Rented Accommodation

The delivery of this Plan is contingent upon the availability of resources to the local authority, both staffing and financial, over the 2025-2029 period.

This plan will be monitored and reviewed with progress reports presented at a regular basis to the Local Traveller Accommodation Consultative Committee so to ensure progress will be maintained.

While the plan is focused on the physical delivery of accommodation, it is important to note that there are many issues such as health and welfare which need to be addressed in conjunction with the provision of Traveller Accommodation, in order to successfully implement the plan.

In this regard, Wicklow County Council will continue to collaborate with a broad range of stakeholders in the delivery of sustainable Traveller accommodation, including the Traveller Community, Approved Housing Bodies and Health & Welfare agencies.

Public Consultation Process

The Housing (Traveller Accommodation) Act, 1998 requires that an extensive consultation process underpins the preparation and implementation of the TAP. All TAPs are required to be prepared and implemented in consultation with other local public bodies, Travellers directly and via Traveller Support Groups, the LTACC and the public in general.

Notice of the intention to carry out the Assessment of Need and to prepare a Draft TAP was given to:

- The members of the LTACC
- Elected Members of Wicklow County Council
- TDs for Co. Wicklow
- Wicklow County Council's Housing & Corporate Estate Strategic Policy Committee

- The Wicklow Traveller Interagency Group
- Neighbouring Counties
- Public Participation Networks

Notice was advertised on Wicklow County Councils website of the proposed preparation of the Draft Traveller Accommodation Plan 2025- 2029. The following two submissions were received -

- 1) Irish Traveller Movement, National Traveller Women's Forum and Pavee Point Traveller and Roma Centre.
- 2) CENA – Culturally Appropriate Homes.

These were taken into consideration in the preparation of the draft plan and the two submissions are included in Appendix 5 of this draft plan.

Appendix 1 – Relevant Department Circular and Guidelines

Circular 46/2023, issued on 18th December 2023 by the Department of Housing, Local Government and Heritage, together with the 'Guidelines on the Preparation, Adoption and Implementation of Local Traveller Accommodation Programmes 2025-2029'. *See website: www.wicklow.ie/Living/ConsultationHub*

Appendix 2 – Operational Issues in terms of the provision of Traveller Accommodation

Management and Maintenance of Traveller Accommodation

In order to ensure that the accommodation and its surrounding area are maintained in good condition and that the Traveller families successfully and peacefully co-exist with other families both from the Traveller and the settled communities it is essential that satisfactory arrangements are put in place for the management and maintenance of Traveller accommodation. Caretakers have been appointed to manage and maintain the existing Group Schemes and Halting Sites in the county.

Measures such as pre-tenancy training and the development of Estate Management services will be implemented.

Unauthorised Encampments:

There are a number of unauthorised Traveller encampments throughout the county. The Council reserves the right to take effective legal action under appropriate legislation available to it at the time in relation to illegal encampments.

Where Travellers take up residence on unofficial sites in close proximity to accommodation provided for Traveller families, the Council reserves the right to take appropriate action in accordance with the provisions of the Housing (Traveller Accommodation) Act 1998.

Allocation of Accommodation:

Allocation of Traveller Accommodation by Wicklow County Council will take place in consultation with the Councils Social Worker having regard to the criteria outlined in the current Scheme of Letting Priorities. In the case of bays on Halting Sites or units in a Group Housing Scheme, the compatibility of families will be taken into account and consultation on this issue will take place with other families in the development. The Council will also have regard to Estate Management issues, however in all instances the Council reserves the right to allocate the unit as it sees fit.

Transfer applications will be considered from the following:

- Mutual transfers between agreeing parties with the approval of Wicklow County Council.
- Mutual transfers between agreeing parties who satisfy the Local Authority guidelines for transfers.
- Mutual Transfer applications are also be accepted between Travellers and members of the settled community.

- Persons with disabilities in respect of accommodation which would be more suitable to their needs.
- To make better use of housing stock and maximise options for families. There are occasions where a family is over accommodated in a dwelling – i.e. a couple may reside in a 5 bed tenancy where a one/two bed unit would now meet their needs as the adult children have left the family home. It was agreed that the Downsizing Programme will be included in this programme to ensure that the larger units can be reallocated to larger families in need of housing.
- To overcome overcrowding.
- In exceptional circumstances where the Local Authority deems it the most appropriate course of action.

Applications for transfers will not be considered from tenants who are in arrears of rent or who have failed to keep to the terms of the tenancy agreement in relation to anti-social behaviour or the upkeep and maintenance of the dwelling occupied by them.

This is in accordance with the relevant local authority Scheme of Letting Priorities adopted by Wicklow County Council.

It is recognised that many families on halting sites will want to move to more permanent accommodation. Such families who apply for transfers will be considered for any suitable vacancy that arises.

Qualification for and inclusion on the Housing List.

Standard conditions will apply and each individual applicant or family must complete an application form for Social Housing Support.

Wicklow County Council, in consultation with the Social Worker, will assess each application and decide on qualification for inclusion in the housing list.

When a family leaves accommodation for reasons other than a family bereavement they will be dealt with on a case by case basis by the Housing Section. Priority will be given however to meeting the needs of Traveller family applicants on the Housing List who have never been accommodated by the local authority.

Traveller families will not be removed from the housing list unless there is prior consultation with the social worker. This is to prevent the erroneous removal of a family from the list.

Tenancy Agreements

A Standard Tenancy Agreement will apply for all accommodation types.

The conditions of the Tenancy Agreement are fully enforced. As part of pre-tenancy training each tenant will be made fully and comprehensively aware of the conditions.

Appendix 3 - Glossary

LTACC: Local Traveller Accommodation Consultative Committee.

Group Housing scheme: A scheme of two or more houses specifically built for members of the Travelling Community.

Transient Site: A transient halting site is a site providing basic facilities for short-term use by families pursuing a nomadic way of life or visiting relatives.

Halting Site: A permanent halting site is a site with individual bays, with a full range of services provided in a small structure on each bay.

Single Site: House or site on its own grounds.

RAS: Rental Accommodation Scheme.

HAP: Housing Assistance Payment.

Appendix 4 – Local Traveller Accommodation Consultative Committee

Name	Organisation
Councillor Joe Behan	Bray Municipal District
Councillor Graham Richmond	Wicklow Municipal District
Councillor Jason Mulhall	Baltinglass Municipal District
Councillor Sylvester Bourke	Arklow Municipal District
Councillor Mark Barry	Greystones Municipal District
Jim O'Brien	BTCDG
Aoibhinn McCloy	CEART
Nelly O'Brien	CEART
Kathleen O'Connor	Primary Health Care
Brian Wildes	Wicklow County Council
Caragh Daly	Wicklow County Council
Mary Rose Walker	Wicklow County Council
Caroline Fox	Wicklow County Council
Michael Nicholson	Wicklow County Council
Sean Keane	Wicklow County Council
Pat Clarke	Wicklow County Council

Appendix 5 – Submissions



Submission to Wicklow County Council on Preparation of Traveller Accommodation Programme

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

THE 'NEEDS ASSESSMENT' PROCESS

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

1. Firstly, the Traveller-to-Traveller basis for consultation is centrally important. The trust that can be established in analysing accommodation needs is essential in getting a realistic and reliable picture of how accommodation needs can be addressed in the longer term.
2. Secondly, the extent and nature of accommodation needs means that a different approach is absolutely necessary. Answering a question about current accommodation needs is not an easy task where the family or individual is living in a crisis situation – and has often been living in crisis for some period of time. Our own experience, in opening up a discussion with Travellers, is that the question about long-term needs and preferences has never really been asked before. For example:
 - a. The needs assessment process people are used to is about identifying the kind of accommodation needed (A or B or C). Where options are limited, then responses are also limited (the options of D E or F are never considered)
 - b. It is extremely difficult for those living in crisis to reflect on what their longer-term accommodation needs might be. It is more likely that responses will reflect what people need 'next week' (in response to current critical living conditions) rather than what they think is needed so their children (and even grandchildren) can have their accommodation needs met in a sustainable way. These kind of short-term responses, we would argue, add to problems in Traveller accommodation rather than relieving them. People will accept offers of accommodation that are not suitable or sustainable – leading to problems for them, their neighbours, and local authorities who find the families back on their housing list in a relatively short period of time.

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

CREATING A COUNTY WIDE ‘TEMPLATE’ FOR THE NEEDS ANALYSIS PROCESS

Cena are currently involved in rolling out this process, for the first time, on a county-wide basis. This is being undertaken in partnership with Clare County Council¹ and involves:

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

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

EXTENDING AND EXPANDING ON THE MODEL OF ENGAGEMENT

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

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

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

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

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



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

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

February 2024

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

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

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

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

Traveller ethnicity

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

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

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

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

1. **Adherence to Guidelines:** DHLGH (2023) Guidelines For The Preparation, Adoption And Implementation Of Local Authority Traveller Accommodation Programmes 2025-2029 be fully endorsed by Each Local Authority

2. **Community Consultation:** It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018 stated, local authorities should collaborate closely with representative bodies of the Traveller community. By involving the Traveller community and their representatives, first hand lived experiences and insights will greatly contribute to the success of the programme.

3. **Determining Need:** Traveller Accommodation Programme must relate to both the existing accommodation needs *and* the projected need that will arise during the period of the programmes, across a range of accommodation options including standard and group housing, permanent residential sites for caravan/trailer, and transient sites. There must be clear and measurable targets.

4. **Inclusion in Development Plans:** County, City and Local Area Development Plans must include objectives for the provision of accommodation for Travellers and the use of particular areas for that purpose.

5. **Alignment with Housing Strategies:** Traveller accommodation should be planned in an intersectional way, informed by Housing for All, The National Housing Strategy(s) for Disabled People 2019 – 2027, The Action Plan on 'Housing Options for our Ageing Population', Housing First (Homeless Strategy) and the National Youth Homeless Strategy.

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

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

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

9. **Alignment with Health Determinations:** We endorse recommendations of The Traveller Health Unit to the Eastern Region to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2025-2029. Health Impact Assessments should be a prerequisite in the design of Traveller accommodation. They should also be undertaken on existing accommodation and reviewed during the lifetime of the TAP.

10. Map Traveller Accommodation in the TAP:

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

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

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

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

14. **Play facilities** should be provided in Traveller specific accommodation in line with Action 61 in NTRIS¹.

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

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

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

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

Traveller Accommodation Legal and Policy Obligations

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

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

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

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

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

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

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

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

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

*The National Youth Homelessness Strategy*⁷, obligates councils to

a) Include specific actions in future Traveller Accommodation Programmes (TAPs), to address youth homelessness'.

b) Work with the LTACCs to consider and put in place any additional supports that are required at a local level to assist young Travellers who are at risk of experiencing homelessness’.

Moratorium Part 8⁸ of the planning process The temporary time-limited moratorium on Part 8 of the planning process, January (2023) had a potential benefit for councils in the acceleration of Traveller specific projects.

Policy Reforms and Reviews since the TAP 2019-2024

The Traveller Accommodation Expert Review 2019⁹. The report sets out an integrated set of recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. These recommendations address four key themes: delivery reflecting need, planning, capacity and resources, and governance.

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

The Office of the Planning Regulator conducted a Case Study Paper entitled *Traveller Accommodation and the Local Authority Development Plan 2021¹¹*, and surveyed existing local authority development plans (1) and Traveller Accommodation Programmes (2) (TAP) to examine links between their policies and objectives relating to Traveller-specific accommodation. The purpose was to address knowledge gaps, to provide support for local authorities in performing their duties and to highlight best practice to foster shared learning.

Current Need

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

These figures would undoubtedly increase if they were to be based on the ETHOS definition of homelessness, which includes overcrowding and couch surfing. In December 2023, only 3% of rental accommodation was available through HAP¹³. The housing crisis has a disproportionate impact on Travellers, who already face discrimination when accessing private rental accommodation. Over 8,000 Travellers are in need of accommodation, including 2000 families in overcrowded or emergency provision, or roadsides. Additionally, 13% of all homeless adults nationally were Travellers¹⁴. As a comparator to national homeless findings (children and adults), this could equate to 1 in 5 Travellers as homeless, as a low estimate.

Social Housing Delivery Trends.

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

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

Need for Traveller for Traveller Homelessness Task Forces.

National Homeless Action Committee (NHAC). There is no national audit or assessment of the need for Traveller homelessness. Homeless services and agencies do not collect Traveller data. Local authorities are responsible for the adoption of Homelessness Action Plans that address the challenges for all homeless people including Travellers, but an audit¹⁶ of local authority Traveller Accommodation Programmes (2014-2019) showed only some local collect data for those in Emergency or homeless accommodation, and 12 of the 31 did not record data with most deferring duty to homeless services. There is a specific urgent need for action focussed local Traveller Homelessness Task Forces, and a central

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

Demographic trends since the last TAP

Population Data – The recent Census provides some suggestive baseline of community demographic patterns, however, is not a total count or assessment nationally. The rate of completion of the ethnic question by Travellers was enumerated in 2022 as 32,949 people¹⁷. The more accurate account is found in figures compiled by the Department of Housing / Local Authority annual estimates (November 2022) accounting for approx. 48,732 people working off a household size of 4.

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

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

Consultation

It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018²⁰ stated “It is essential that Traveller Accommodation Programmes are prepared in a consultative manner. The Act requires that housing authorities consult with adjoining housing authorities, the HSE, approved housing bodies, the Local Traveller Consultative Committee, other local Traveller representative groups, community and interest groups and the public in general. The purpose of broad consultation ensures that the interests of all concerned with or affected by proposals for Traveller accommodation are considered and to facilitate a planned and comprehensive response by housing authorities to the accommodation needs of Travellers’.

Consultation Process

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

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

Under Section 42 (Appendix B) of the *Irish Human Rights and Equality Act 2014*²¹ all public bodies in Ireland, including Local Authorities, have responsibility to promote equality, prevent discrimination and protect the

human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, the Public-Sector Equality and Human Rights Duty.

Statement of Strategy

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

Assessment of Needs

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

Traveller Accommodation Expert Review July 2019²²

This report set out an integrated set of 32 recommendations intended to improve the

effectiveness of the arrangements for providing accommodation for members of the

Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. The following recommendations are particularly relevant to the development of Traveller Accommodation Programmes.

Expert Review Recommendation A.8:

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

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

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

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

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

Traveller Specific Accommodation

The Office of the Planning Regulator²³ identified as best practice, the need for Local Authorities, in planning for Traveller accommodation to:

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

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

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

Development of Transient Sites

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

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

Tenant Participation

The degree to which Travellers are involved in the development of accommodation options and supported to play a full and meaningful role in the management of such, is central to building and sustaining a successful Traveller Accommodation Strategy. Benefits of tenant participation include the generation of greater ownership within communities, resulting in tenants becoming more involved in the sustainability of their overall living environment; encourages dialogue between the housing authority officials and residents; moves the operational context from complaints to a plan of action based on need and develops an understanding of Traveller issues and builds new relationships between all involved.

Caravan Loan Scheme

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

Fire Safety in Traveller Accommodation

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

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

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

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

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

Appendices

Appendix A

Summary of Requirements for the Traveller Accommodation Programmes Provided in the DHLGH Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025-202924

- The Minister has, under section 6(1) of the 1998 Act, directed that relevant housing authorities for the purposes of preparing a Traveller Accommodation Programme in the functional area concerned, make an assessment of the accommodation needs of Travellers who are assessed under S.20 of the Housing (Miscellaneous Provisions) Act 2009 as being qualified for social housing support, including the need for sites.
- The Minister has given a direction under section 6(5) of the 1998 Act, specifying that relevant housing authorities shall make an estimate of the projected accommodation needs of Traveller families arising during the duration of the programme (1 January 2025 to 31 December 2029).
- Under section 10(2)(b) of the Act the Minister has directed that the information in relation to the needs to be met by the programmes shall be in summary form but in sufficient detail to show the needs for all categories of Traveller accommodation and the general area in which the accommodation is required.
- The Minister has directed under section 10(2) of the 1998 Act that annual targets be included in the programmes in respect of the implementation of the programmes. The targets should include details of the numbers of units of accommodation proposed to be delivered for each of the five years of the programme for Traveller specific accommodation (group housing, bays on halting sites, including transient sites) both new and refurbished and for standard housing.
- Under section 7(4) of the Act the Minister has specified 31 December, as the latest date by which accommodation programmes must be adopted.
- The Minister has, under section 10(1) of the 1998 Act, directed that the next accommodation programme should be for a period of 5 years and that the programme shall begin on the 1st of January 2025.
- The Minister has, under section 17(1) of the 1998 Act, directed that a review of the next accommodation programme should be carried out no later than 30th June 2027.

Appendix B

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

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

1. LTACCs are to advise the appointing authority in relation to: The provision and management of accommodation for Travellers.
2. Nomination procedures need to be inclusive and transparent and Traveller representatives appointed should be positioned to represent the overall Traveller population in each area. In areas where local Traveller accommodation organisations exist, these groups should nominate their own representatives, where local groups do not exist, national Traveller organisations should be a point of reference to local authorities.
3. The preparation and implementation of any accommodation programme for the functional area of the appointing local authority. The issue of management of Traveller accommodation and discussion of individual accommodation cases, should not feature within the scope of the work of LTACCs.
4. Operation practice: LTACCs should meet a minimum of 4 times a year, as laid out. In accordance with the Housing Traveller Accommodation Act 1998 and NTACC guidelines. The Director of Services should report in person to every meeting of the LTACC.
5. The overall objective of the LTACCs is to ensure Traveller Accommodation Programmes are implemented in full. In order for this to happen LTACCs should embed annual monitoring indicators offset against TAP annual targets and its own work plan. Process, as well as delivery, should be monitored by the LTACC.
6. The LTACC should produce an Annual Report including a summary of activities in the period. Copies of this Report should be given to the appointing Local Authority as well as a copy sent to the National Traveller Accommodation Consultative Committee.
7. The LTACC should formally report to the appointing Local Authority Manager & Director of Services twice a year. The Manager and Director of Services should formally be asked to meet with the LTACC once a year, on completion of the LTACCs Annual Report.
8. LTACCs are crucial to the success of TAPs. In cases where LTACCs are not functioning the national accommodation officer of the ITM are available to assist.
9. Ensure 'Memorandums of understanding' to inform the work practices of LTACC's and ensure an effective and pragmatic approach to working in partnership with positive duty obligations as per Section 42 of the IHREC Act (2014) for members of the LTACC.

Appendix C

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

Public bodies

42. (1) A public body shall, in the performance of its functions, have regard to the need to—
- (a) eliminate discrimination,
 - (b) promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
 - (c) protect the human rights of its members, staff and the persons to whom it provides services.
- (2) For the purposes of giving effect to subsection (1), a public body shall, having regard to the functions and purpose of the body and to its size and the resources available to it—
- (a) set out in a manner that is accessible to the public in its strategic plan (howsoever described) an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body and the policies, plans and actions in place or proposed to be put in place to address those issues, and
 - (b) report in a manner that is accessible to the public on developments and achievements in that regard in its annual report (howsoever described).
- (3) In assisting public bodies to perform their functions in a manner consistent with

subsection (1), the Commission may give guidance to and encourage public bodies in developing policies of, and exercising, good practice and operational standards in relation to, human rights and equality.

(4) Without prejudice to the generality of subsection (3), the Commission may—

(a) issue guidelines, or

(b) prepare codes of practice in accordance with section 31,

in respect of the development by public bodies of performance measures, operational standards and written preventative strategies for the purpose of reducing discrimination and promoting human rights and equality in the public sector workplace and in the provision of services to the public.

(5) Where the Commission considers that there is evidence of a failure by a public body to perform its functions in a manner consistent with subsection (1) and that it is appropriate in all the circumstances to do so, the Commission may invite the public body to—

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

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

or both.

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

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

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

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

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

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

(a) may, or

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

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

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

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