



**Comhairle Contae
Loch Garman
Wexford
County Council**



Traveller Accommodation Programme 2019-2024

Mid-Term Review

*Adopted by Wexford County
Council on 13th February 2023*

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Acronyms/Glossary of Terms

AHB Approved Housing Body	AHO Area Housing Officer
ASW Area Social Worker	CAS Capital Assistance Scheme
DHPLG Department of Housing, Planning and Local Government	HAP Housing Assistance Payment
HLO Housing Liaison Officer	LTACC Local Traveller Accommodation Consultative Committee
RAS Rental Accommodation Scheme	TAP Traveller Accommodation Programme
TIG Traveller Interagency Group	SI Statutory Instrument
WCC Wexford County Council	WLECP Wexford Local Economic and Community Plan
CPG Corporate Policy Group	SPC Strategic Policy Committee
WLD Wexford Rural Development	PPN Public Participation Network

Traveller Group Housing

A scheme of two or more houses specifically built for members of the Traveller Community.

Transitional Site

A transitional site provides basic facilities for families awaiting permanent accommodation.

Permanent Halting Site

A permanent halting site has individual bays with a full range of services provided in a small structure on each bay.

Temporary Halting Site

A temporary halting site has individual bays consisting of a yard with basic services.

Single Site

A house or site on its own grounds.

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.

Executive Summary

Wexford County Council (WCC) prepared the Traveller Accommodation Programme (TAP) in accordance with the Housing (Traveller Accommodation) Act 1988 and it was adopted by Wexford County Council on 8th July 2019. This programme aims to meet the accommodation needs of Traveller families in the county for the 5 year period from 1st July 2019 to 30th June 2024.

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 assessment of the accommodation need was carried out in August 2022 as part of the mid-term review of TAP 2019-2024. This statutory assessment of need assessed all applicants seeking assistance with accommodation. The number of approved Traveller families seeking accommodation is 73 (*this number includes 47 from the existing programme plus 26 new applicants since the programme commenced*).

WCC is committed to meet the projected accommodation need of 73 units identified as part of the mid-term review of the Traveller Accommodation Programme 2019-2024. Wexford County Council intends to increase the targets to include the 26 new applicants as identified in the assessment of need, the table below outlines the revised targets for the remainder of the TAP 2019-2024:-

Year	Target
2019-2020	20
2020-2021	20
2021-2022	20
2022-2023	33
2023-2024	33
TOTAL	126

Section 1 – 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 1st July 2019 to 30th June 2024. The current TAP was adopted by Wexford County Council on 8th July 2019.

The estimated number of accommodation units identified to meet the needs of the Traveller Community within the lifetime of the above is 100 housing units. Following the mid-term review, Wexford County Council intend to increase the targets to 126 units over the for the remainder of the TAP 2019-2024.

Wexford County Council is committed to working with Travellers, Traveller Representative, Local Communities and other agencies to deliver the programme and provide quality accommodation for members of the Travelling community through LTACC. The implementation of this programme requires a commitment from all involved to work together. The proposals contained in the programme are also subject to the necessary funding being available.

Section 2 – Policy Considerations

2.1 Public Sector Duty

Wexford County Council is committed to embedding the Public Sector Duty into the work we do. 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 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.

The Public Sector Duty requires a public body, having regard to its functions, purpose, size and resources available to it, to:

1. **Assess** - set out in its strategic plan an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body;
2. **Address** - set out in its strategic plan the policies, plans and actions in place or proposed to be put in place to address those issues;
3. **Report** - report on developments and achievements in its annual report.

Wexford County Council will be preparing a strategy for implementing the Public Sector Duty across the organisation. Implementation of the Public Sector Duty will have regard to the functions of the authority in relation to Traveller Accommodation, the Traveller Accommodation Programme 2019-2024 and the continuing work of the Local Traveller Accommodation Consultative Committee (LTACC).

2.2 IHREC Equality Review Process

As part of the mid-term review process of this programme, Wexford County Council was cognisant of the recommendations of a recent Irish Human Rights and Equality Commission Equality Review carried out on Wexford County Councils current Traveller Accommodation Programme. A full list of the recommendations and reply from Wexford County Council is included in Appendix 1.

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.

Section 3 – Assessment of Need

3.1 2022 Assessment of Need

As part of the mid-term review of the Traveller Accommodation Programme 2019-2024 an assessment of housing need was carried out in August 2022 to establish any changes to the existing and projected accommodation identified in 2019. Seventy three Traveller family applicants were identified through this process. The following table gives a breakdown of the mid-term review assessment:-

Municipal District	Approved applicants	Transfer	New Applicants since 2019	HAP	Licence	TOTAL
Enniscorthy	10	1	13	0	0	24
Wexford	10	3	2	1	3	19
Rosslare	1	2	1	0	1	5
New Ross	8	3	6	0	0	17
Gorey	3	1	4	0	0	8
TOTAL	32	10	26	1	4	73

Families can only be included in the assessment of need and therefore considered for accommodation if the appropriate application forms are completed and submitted to WCC. Once submitted the AHO will assess them to determine the accommodation need in accordance with the statutory assessment regulations. Families will be supported in this process and the onus to complete and submit the appropriate forms is on the applicants themselves.

It should be noted that there are a number of families living in social housing tenancies where the applicants consider that their current accommodation no longer meets their needs. Ten families have applied for housing transfers to more suitable accommodation. These families will have their ongoing accommodation needs addressed as part of Wexford County Council's housing allocation and will be considered as part of the overall assessment of accommodation need.

3.2 Current Profile in Co Wexford

In December 2021 as part of the annual National Traveller Estimate a total of 763 families were identified in County Wexford. Six hundred and forty four are currently accommodated and 119 families are without accommodation. The table below shows the breakdown by Municipal Districts:-

Table 1 – Families with Accommodation

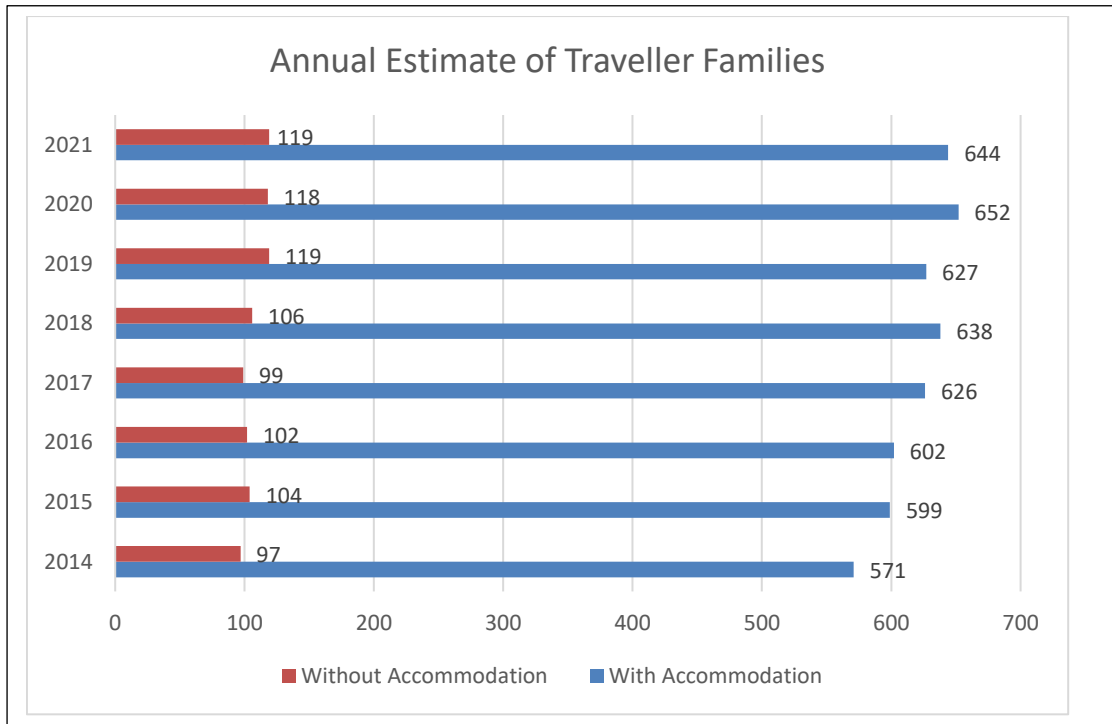
Type of Accommodation	Municipal District					Total 2021
	Enniscorthy	New Ross	Wexford	Gorey	Rosslare	
Standard Social Housing	38	55	45	33	23	194
Local Authority Group	29	12	2	0	1	44
Private LA Assist	16	9	3	2	1	31
Other Private Houses	78	87	20	22	24	231
Private Rented	40	19	24	14	4	101
Voluntary Housing	7	2	6	14	0	29
Official Halting Sites	6	3	0	0	0	9
Other.	2	1	2	0	0	5
Total Families with Accommodation	216	188	102	85	53	644

Table 2 – Families without Accommodation

Type of Accommodation	Municipal District					Total 2021
	Enniscorthy	New Ross	Wexford	Gorey	Rosslare	
Sharing with relatives	19	8	8	16	5	56
Unauthorised Sites	15	11	8	16	9	59
Transient Sites	0	0	0	0	0	0
Roadside Caravans	0	0	0	0	0	0
OTHER	2	2		0	0	4
Total Families without Accommodation	36	21	16	32	14	119

3.3 Analysis of Annual Traveller Count

The graph below shows the results of the annual traveller estimate from 2014-2021. A total 763 families were identified in 2021 as in residing in County Wexford and of the total 644 are categorised as with accommodation. Of the 119 families that are categorised as in need of accommodation, a total of 73 families are requesting accommodation from Wexford County Council.



Section 4 – Role of Wexford County Council

Wexford County Council has a responsibility for meeting the accommodation needs of the Travelling Community through the adoption and implementation of the Travelling Accommodation Programme 2019-2024. All housing applications will be considered in accordance with the Allocation Scheme. 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.

4.1 Accommodation Types

The Council will promote a range of social housing options for Traveller families which are set out hereunder:-

- Standard Local Authority Housing
- Traveller Group Housing
- Halting Site
- Specially Adapted Housing
- Transient Sites
- Mobility Aids Housing Grant Scheme
- Housing Aid for Older People
- Housing Adaptation Grant for People with a Disability
- Long Term Leasing
- Voluntary or Co-Operative Housing
- Rental Accommodation Scheme (RAS)
- Housing Assistance Payment (HAP)

4.2 Consultation

The Housing (Traveller Accommodation) Act, 1998 requires that an extensive consultation process underpins the preparation and implementation of the Traveller Accommodation Programme. All Traveller Accommodation Programmes are required to be prepared in consultation with other adjoining local authorities, Health Service Executive, local Traveller organisation and groups, individual Travellers, the local LTACC and other relevant community groups and the public in general.

As part of the consultation process for the mid-term review of the TAP 2019-2024 Wexford County Council wrote to the following stakeholders on 15th July 2022 giving notice of the intention to carry out a mid-term review of the Traveller Accommodation Programme, the Assessment of Need and inviting submissions for the preparation of the draft TAP 2019-2024 as per Section 8 of the Housing (Traveller Accommodation) Act, 1998 (see table on next page). In addition, an advertisement was placed in the local paper and on the Councils consultation / social media pages inviting submissions. One submission was received from Wexford Local Development (WLD) (see Appendix 2) and the contents were noted and considered in preparation of the mid-term review:-

Waterford City & County Council	Carlow County Council
Wicklow County Council	Local Traveller Accommodation Consultative Committee
Kilkenny County Council	Wexford Local Development
Tuath Housing	Co-operative Housing Movement in Ireland
Oaklee Housing	Focus Housing Association
Cluid Housing	Social Inclusion Office HSE
Irish Traveller Movement	Health Service Executive
Traveller Interagency Group	Respond Housing Association
STEER	iCare Housing
Clanmil Housing Association	Peter McVerry Trust

The draft mid-term review of the Traveller Accommodation Programme 2019-2024 was prepared and submitted to the following committees for discussion and approval:-

- Housing & Community SPC on 7th September 2022
- LTACC on 12th September 2022
- LTACC on 16th January 2023
- Housing & Community SPC on 1st February 2023

It was agreed that the targets for the remainder of the programme would be increased to meet the assessment of need carried out in August 2022 as part of the mid-term review. An advert was placed in the Local Paper and the Council's consultation / social media pages inviting submissions on the revised targets. There were no submissions received during the period of public consultation from 19th October to 14th December 2022.

Section 5 – Evaluation of TAP 2019-2024

5.1 Targets 2019-2024

The table below shows the annual targets set for the 5-year term of the Traveller Accommodation Programme 2019-2024. The Council has committed to build, purchase and liaise with Approved Housing Bodies and the Private Sector to meet the accommodation need of families whose preferred choice is standard social housing. The projected need was assessed as 100 units over the lifetime of the programme:-

Year	Target
2019-2020	20
2020-2021	20
2021-2022	20
2022-2023	20
2023-2024	20
TOTAL	100

5.2 Progress Achieved - TAP 2019-2024

Wexford County Council has assisted Traveller families find suitable accommodation over the years. WCC has endeavoured to meet the targets set out in the Traveller Accommodation Programme 2019-2024, the table below shows the accommodation units accepted over the lifetime of the programme.

Despite the restrictions under Covid 19 Wexford County Council still managed to accommodate 53 families and assisted 10 more families in private rented accommodation with Housing Assistance Payment (HAP). However, it should be noted that a further 28 offers of accommodation have been refused by Traveller families since July 2019.

Year	Target	Number Housed	HAP
2019-2020	20	15	2
2020-2021	20	14	1
2021-2022	20	19	6
2022-2023	20	5	1
2023-2024	20	n/a	0
TOTAL	100	53	10

Section 6 – Mid-Term Review of TAP 2019-2024

An assessment of the accommodation need was carried out in August 2022 as part of the mid-term review of the Traveller Accommodation Programme 2019-2024. This statutory assessment of need assessed all applicants seeking assistance with accommodation. The number of approved Traveller families seeking accommodation is 73. The following table shows the breakdown of their preferred accommodation type. This number includes 47 from the existing programme plus 26 new applicants since the programme commenced.

Municipal District	No of families	Social Housing					Traveller Group Housing	Halting Site
		1 bed	2 bed	3 bed	4 bed	5 Bed		
Enniscorthy	24	1	6	15	2	0	0	0
Wexford	19	7	4	3	1	0	4	0
Rosslare	5	0	1	2	1	1	0	0
New Ross	17	2	0	12	1	0	0	2
Gorey	8	2	2	2	2	0	0	0
TOTAL	73	12	13	34	7	1	4	2

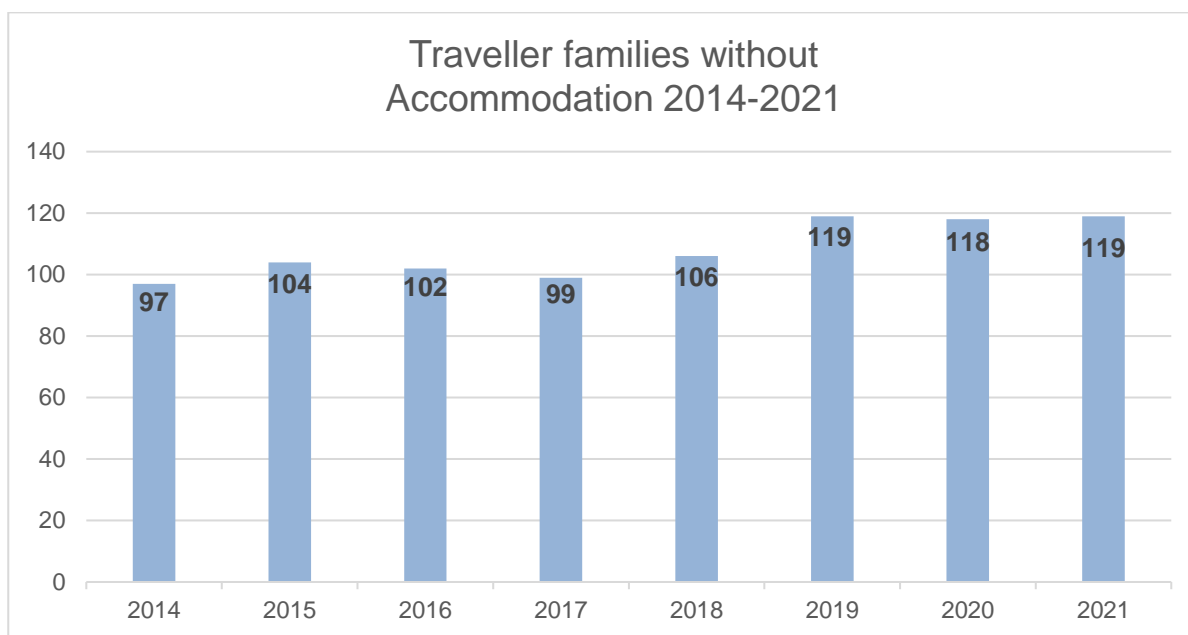
Whilst Traveller specific accommodation will be progressed, the main source of accommodation units over the lifetime of this programme will be standard social housing in accordance with the applicant's choice, which includes RAS, Leased Accommodation, Approved Housing Bodies and also supported Private Rented Accommodation.

The assessment of need identified that 4 families require ground floor accommodation, and 2 families were identified as requiring specially adapted bungalows.

It should be noted that there are a number of families living in social housing tenancies where their current accommodation no longer meets their needs. They have applied for housing transfers to more suitable accommodation. These families will have their ongoing needs addressed as part of WCC housing allocation and will not be considered as part of the overall accommodation need as it will not result in a need for additional units of accommodation.

6.1 Projected Accommodation Needs 2019-2024

In addition to the analysis of assessment of need, consideration has also been given to the projected need for accommodation during the period of this programme 2019-2024. There is no data available from the 2022 Census as yet, however the 2016 Census indicated an increase of 0.5% on the 2011 Census figure. The annual traveller count does not show a considerable increase in the numbers without accommodation:-



The assessment of need conducted as part of the mid-term review of the Traveller Accommodation Programme 2019-2024 identified 47 families in need of housing plus an additional 26 new applicants since the programme commenced in 2019. WCC will aim to provide **73** accommodation units within the remaining lifetime of the Traveller Accommodation Programme 2019-2024. The assessment of need identified most families preferred Social Housing, Traveller Group Housing Scheme or Halting Site.

6.2 Annual Targets

Wexford County Council is committed to meet the projected accommodation need of 73 units identified as part of the mid-term review of the Traveller Accommodation Programme 2019-2024 programme. The Council will build, purchase and liaise with Approved Housing Bodies and the Private Sector to meet the accommodation need of families whose preferred choice is standard social housing. As part of the mid-term review it was noted that four families expressed an interest in Traveller Group Housing in the Wexford Municipal District Area and two families expressed an interest in Halting Site in New Ross Municipal District Area the

remaining 41 families expressed an interest in standard Social Housing. Wexford County Council intends to increase the targets to include the 26 new applicants as identified in the assessment of need, the table below outlines the revised targets for the remainder of the TAP 2019-2024:-

Year	Target
2019-2020	20
2020-2021	20
2021-2022	20
2022-2023	33
2023-2024	33
TOTAL	126

6.3 Implementation Strategy

The mid-term review of the Traveller Accommodation Programme 2019-2024 indicates a need to provide 73 units of accommodation during the remaining lifetime of this programme. While the targets reflect the preferred options, WCC will work with applicants to explore all housing options with a view to meeting their housing need. The Council will avail of the full range of housing options through the following methods:-

6.3.1 Private Rented

The Long Term Leasing Scheme, Rental Accommodation Scheme (RAS) and the Housing Assistance Payment (HAP), will be utilised as a means of addressing long term housing needs. It is acknowledged that there are issues arising in relation to the availability of private rented accommodation. The Homeless HAP Place Finder will assist Traveller families with the threat of becoming homeless in sourcing suitable private rented accommodation.

6.3.2 Standard Social Housing

Standard Local Authority accommodation remains the preferred accommodation option for households in Wexford. It is envisaged that the need will be met through the housing construction programme. As casual vacancies become available WCC will strive to accommodate families according to need.

6.3.3 Traveller Group Housing

Four families expressed an interest in Traveller Group Housing in the Wexford Municipal District Area during the assessment of need. At present Wexford County Council has 8 group housing schemes throughout the county in the following locations:-

Location	No of units	Location	No of units
Drumgoold, Enniscorthy	14	Na Coillte, Bunclody	7
Clonleigh, New Ross	2	Palace East, New Ross	2
Marconi Park, Enniscorthy	8	An Caislean Mhaol, New Ross	2
An Cluain Huigheid	4	Ballyhine, Barntown	2

In the vast majority of these schemes no negative issues have arisen. However, the scheme at Marconi Park, Enniscorthy continues to present challenges for Wexford County Council as well as the local community.

The establishment of a group housing scheme in the Wexford Municipal District area will be delivered as part of this Traveller Accommodation Programme to meet the need of the four families identified as part of the assessment of need.

6.3.4 Approved Housing Bodies (AHB)

Funding has been approved by the Department of Housing, Local Government and Heritage (DHLGH) for Approved Housing Bodies for 242 units for County Wexford for 2022 and 2023. However, proposals have been received from AHB's for another circa 700 housing units for 2022 to 2024. Wexford County Council has full nomination rights to these units for social housing applicants.

6.4 Funding

The capital provision for Traveller specific accommodation identified in TAP 2019-2024 will be sourced from the Department of Housing, Planning and Local Government (DHPLG) under the Annual Capital Funding Allocation for Traveller Specific Accommodation. Wexford County Council will submit proposals to:-

- Progress Traveller Accommodation projects already approved
- Submit further details of Traveller Accommodation projects approved in principle
- Submit new projects for Traveller Accommodation for consideration as they arise

Housing acquisitions will be submitted to the DHPLG under the Social Housing Capital Investment Programme (SHCIP) and the Capital Assistance Scheme (CAS) as with all social housing acquisitions.

Section 7 - Conclusion

As the mid-term review indicated that we are there is an additional 26 applicants since the commencement of the TAP 2019-2024 Wexford County Council will increase the targets to meet this additional demand. The estimated number of accommodation units required to meet the needs of the Traveller Community within the remaining lifetime of this Traveller Accommodation Programme 2019-2024 was determined as 73 housing units.

Wexford County Council is committed to working with Travellers, Traveller Representative, Local Communities and other agencies to deliver the programme and provide quality accommodation for members of the Travelling community through LTACC. The implementation of this programme requires a commitment from all involved to work together. The proposals contained in the programme are also subject to the necessary funding being available.

Appendix 1 – Equality Review 2016

Equality Review Recommendations	Wexford County Council Response
Address policy and procedure for:-	
(a) presenting data and information in the TAPs and progress reports, in particular: a breakdown of preferences by accommodation type; and a breakdown of targets and outputs by accommodation type, in particular indicating numbers for LA housing, AHB housing, HAP/RAS, lease provision;	Wexford County Council currently include information as evidenced in a recent report to Council on progress under TAP and commit to increasing transparency of data where and as possible.
(b) assessing, tracking and independently verifying the preferences of the Traveller community in relation to type of accommodation;	The Council currently holds information on all approved social housing applicants on iHouse. This system does not hold historic information on changes to preferred accommodation types. The system does provide for an ethnic identifier for those that wish to identify themselves as traveller under Classification of Need.
(c) support and enable Traveller applications for social housing supports and analyse and manage issues of rejection of offers made;	It is not clear to the Council what impact the introduction of an independent verification process around preferences would have in practice while a separate administration process to verify a preference could be put in place; in effect, families/persons are entitled to change their accommodation preference; should their circumstances or views on accommodation change.
	<p>The challenges experienced around preference changes tend to be more nuanced in practice and often routed in issues around desirability as opposed to need.</p> <p>The social housing refusal rate runs between 25 and 33% applicants do want social housing, but often they have a preference for housing in a specific area at a specific life point. The Council classify refusals as either reasonable or unreasonable. The Council will further examine existing data sets to determine whether additional positive action in the context of travellers could be brought. Given the complexity and range of recommendations to be actioned, this will be unlikely to be substantially progressed until 2023.</p>

<p>(d) planning and providing for new family formations over the life of the TAP;</p>	<p>This is already provided for by Wexford County Council in the current TAP in two ways:</p> <p>(1) allowing for projected growth within the next 5 years of 0.5% (based on Census data) insetting of the programme target of 100 units and</p> <p>(2) Through the mid-term review process, which takes cognisance of the actual traveller population and where changes (increases/decreases) in demand can then be reflected in the TAP target.</p>
<p>(e) responding to the practical implications of Traveller ethnicity, in the provision of standard housing, in particular for supporting and sustaining integrated culturally diverse communities;</p>	<p>Wexford County Council carries out a wide range of functions and responsibilities across multiple areas. In terms of the traveller equality review, the Councils response has specifically related to issues around accommodation. Through the community function, the Council facilitate the Traveller Interagency Group (TIG) which is focussed on non-accommodation related supports to the Traveller Community across the County.</p> <p>In addition, the Council also facilitates a wide-ranging Social Inclusion Community Activation Programme.</p> <p>Specifically in terms of the housing function, the local authority has a range of resources in place to support traveller accommodation, including Social Workers and Housing Liaison Officers across the county. While all staff are expected as part of their duties to meet the needs of travellers as social housing applicants, one of the Housing Liaison Officers specifically undertakes duties in relation to Traveller Accommodation Officer.</p>
	<p>These duties include undertaking the traveller count, engaging with transient traveller families and those that may be residing in illegal halting sites as well as acting as main point of contact for traveller representatives on LTACC. This staff member is familiar to members of the traveller community in the county, has a long-established relationship with the families and is well regarded by them.</p> <p>The Council is in the process of reviewing the social work resource currently in place. The national review of social work is expected shortly and the Council will review resource structures and requirements at that time. It is acknowledged that minority groups, such as travellers and those experiencing homelessness, can require additional support in terms of accessing services and engaging with the required processes. Traveller and Roma populations can suffer a compounding impact due to language/literacy, education levels, homelessness, mental health and other areas. The responsibility of the</p>

	<p>Local Authority is to ensure our services are accessible to all and where necessary, provide additional supports in that regard. In addition, embedding the Public Sector duty now places a positive duty on public sector organisations to ensure they strive to promote equality and eliminate discrimination. This work will take 18-24 months to implement and progress.</p> <p>It is the Councils experience that the integration of traveller families who opt for standard social housing is largely positive.</p>
(f) tracking the experiences of the Traveller Community in seeking to secure accommodation in the private rented sector and addressing the issues identified;	<p>This point is addressed under (g) below.</p>
(g) developing culturally specific responses to the needs of Travellers experiencing homelessness;	<p>The Councils Homeless Unit provides support to those that are experiencing or are at risk of homelessness. The Council, through this unit, does receive reports from time to time of discrimination being experienced by travellers from private sector landlords; in addition, the Council also receives complaints from non-traveller social housing applicants who also report they have experienced discrimination. Where these cases arise, persons are informed that landlords are not permitted to discriminate against HAP supported tenants and/or Travellers and are encouraged to lodge a formal complaint with the Residential Tenancies Board or seek advice from Threshold.</p>
	<p>It is the Councils experience that this is rarely taken up due to a variety of factors on the part of the applicant. It is also the Councils experience that it is rare for prospective tenant to secure evidence, outside of inferences drawn from verbal conversations, to be available to support a complaint under discriminatory grounds.</p> <p>This can be challenging for tenants who are in need of accommodation and who do not have time or energy to invest in a complaints process, which can take a long time to resolve. Apart from encouraging complaints to be lodged in this matter, the local authority is not responsible nor has any power in regulating access to private rented accommodation.</p> <p>In terms of the Councils homeless unit and culturally specific responses, the staff provide additional support to members of the traveller community in completing forms and providing additional time to secure relevant documentation. The Council prioritise homeless persons</p>

	<p>into emergency accommodation as quickly as possible and take account of a person's circumstance; for travellers this can include a lack of equal opportunity to private rented accommodation; additional extended family challenges as well as literacy.</p>
<p>(h) establishing and developing a response to the needs of Travellers who are nomadic within and through the county through the provision of transient halting site bays;</p>	<p>The Council undertake the development of a TAP every 5 years, which takes account of the expressed needs of the traveller population in need of housing. In the previous two programme cycles, the Council has not received requests for transient halting site provision. From discussions at LTACC, traveller representatives would have serious concerns regarding the provision of transient halting sites.</p> <p>The Council will continue to assess the needs expressed by travellers within the County and seek to address these through all available resources.</p>
<p>(i) establishing and applying equality and non-discrimination standards for any private contractors involved in the provision of services that relate to the management of Traveller-specific accommodation;</p>	<p>The Council will review contract arrangements that are in place with a view to exploring the requirement for the inclusion of expressed equality and non-discrimination standards. This does not and cannot reduce the Council's responsibility around ensuring health & safety is maintained. It is the Council's experience that at times, health and safety expectations can and are misinterpreted as discrimination. This will be examined during 2022.</p>
<p>(j) establishing appropriate structures, processes, and supports for Traveller tenant participation in estate management on Traveller-specific accommodation;</p>	<p>To date the Council's experience is that there is very little appetite among traveller families in traveller specific accommodation to become involved in estate management projects. The Council's HLOs & AHOs will continue to engage with families in this regard. LTACC and TIG will be consulted in relation to this recommendation need and how it might be addressed locally through Council supported initiatives and /or opportunities through SICAP.</p>
<p>(k) Identifying and responding to the imperative of an informed and empowered participation by Travellers on the LTACC through capacity-building or support for representatives;</p>	<p>In the context of work required to embed the Public Sector Duty, the Council will engage with agency colleagues on capacity building and additional supports that may be required by Traveller representatives. The COVID 19 pandemic impacted the participation levels of LTACC substantially and while efforts were made to provide training and support, this proved challenging overall. This will be undertaken during 2022 in conjunction with Traveller Representatives support agencies.</p>

<p>(l) implementing the Public Sector Equality and Human Rights Duty in the next review of the TAP, on the basis of the guidance provided by the Commission.</p>	<p>The Council commits to implementing the Duty in the upcoming review of TAP, expected to be completed during 2022.</p>
<p>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).</p>	<p>Applicants must be approved for Social Housing Supports before being assessed for an emergency homeless service. Applicants can identify as Traveller & express a preference for Traveller specific accommodation on the Social Housing Supports application form (National form).</p> <p>At present, the form does not provide for any applicant expressing a preference for outdoor space for dogs. It is not feasible to provide traveller specific emergency accommodation in terms of homeless supports due to the complexities and numbers of persons presenting.</p>
<p>3. Develop a more transparent recording of the methodology of collection and data obtained in the annual count of members of the Traveller community (for example by survey, setting out the steps taken to ensure all members of the Traveller community were reached and including such questions as multiple accommodation preferences and difficulties in accessing such preferences or other accommodation in the past).</p>	<p>The Council commits to undertaking a review of the procedure used to obtain and record data in relation to the annual count of members of the Traveller Community. In particular, the Council will document the process and methodology used during the 2022 traveller count and retrospectively in 2021.</p>

<p>4. Consider the possibility of employing a Traveller Liaison Officer, who should have a drop-in or phone clinic by which members of the Traveller community can voice any concerns they may have in respect of their accommodation directly. The officer could also assist with online applications where members of the Traveller community have no access to the internet. The officer 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.</p>	<p>1 (e) above refers. The Council further commits to undertaking a review through LTACC of preferences for engagement during 2022.</p>
<p>5. Engage the services of an appropriate independent body, to draft a report on the reasons why challenges are faced by both the Council and the local community in respect of the group housing scheme in Marconi Park and possible steps that could be taken to address these challenges and to ensure that similar difficulties do not arise in respect of the planned group housing scheme for the Wexford municipal district area. Any such steps taken by the Council should be published.</p>	<p>The Council will review these recommendations in conjunction with LTACC during 2022 and proceed accordingly. The Council will continue to work on the delivery of traveller specific accommodation in relation to the needs of the families in question.</p>
<p>6. Engage the services of an appropriate independent body, to draft a report on steps that could be taken by the Council to improve its systems for the drawdown of Traveller-specific accommodation funding, to include addressing how projects could be more thoroughly assessed at the outset before an application for allocation is made to the DHPLG and addressing why a number of tenants changed their preferences following such an application being made. Any such steps taken by the Council should be published.</p>	<p>As reported in the initial submission, under the Councils current TAP, 95 of the 99 families in need have expressed a preference for standard social housing. 4 of the families at that time, expressed a preference for traveller group housing. Thus, 96% of the Councils traveller accommodation provision is ineligible for traveller specific accommodation funding.</p> <p>Where the Council has progressed applications under Traveller Specific Accommodation funding, the projects have been progressed in consultation with the relevant families. The Council will consider the value in undertaking a system review of these cases before the end of 2022.</p>

<p>7. Record data on both funds allocated and drawn down for Traveller-specific accommodation and those for general accommodation. This would help to inform the Council to ensure that there is no less favourable treatment of Travellers in the provision of accommodation. Account may be taken of the true preferences of members of the Traveller community whose accommodation needs are met through general housing funds and of the fact that some forms of accommodation are more expensive than others.</p>	<p>As reported in the initial submission, under the Councils current TAP, 95 of the 99 families in need have expressed a preference for standard social housing. 4 of the families at that time, expressed a preference for traveller group housing. Thus, 96% of the Councils traveller accommodation provision is ineligible for traveller specific accommodation funding.</p> <p>While the recommendation has some merit, the work in undertaking this metric could be substantial. The measure of whether the Council is effective in delivering on TAP is captured in the successful tenancy numbers at the end of the programme. The Council will examine how this might be actioned in practice during 2022.</p>
<p>8. Assess over the coming years whether the new procedures set out in Circular 03/2020 of the DHPLG improve its rate of draw down for Traveller-specific accommodation. If no improvement is evident at that point, the Council should commission an independent report to determine the reasons for this and follow any recommendations made.</p>	<p>The Council will continue to seek funding for Traveller specific accommodation where such accommodation is required and reflect on this in line with the development of traveller accommodation programme cycles.</p>
<p>9. Adopt a broad equality policy incorporating discrimination on all prohibited grounds and all staff should receive training on this policy.</p>	<p>As per correspondence 19th June 2020, the Council have an equality policy in place and staff receive training on this.</p>

Appendix 2 – Submissions

This submission from Wexford Local Development was received following a letter to stakeholders on 15th July 2022 inviting submissions for a mid-term review of the Traveller Accommodation Programme 2019-2024.

Submission No 1	
Name: Wexford Local Development	
Summary of Issues	Chief Executive's Response
<p>WLD recognises the important role of culturally appropriate accommodation in promoting the social inclusion of Travellers in the wider community and welcomes the provisions of the TAP to address the needs of the local Traveller population in the county. Key to this, from our perspective, is the LTACC structure. Now that the worst of the Covid-related restrictions are hopefully behind us, WLD would advocate for the renewed activation of this committee with every effort being made by Wexford County Council executive and elected members as well as by Traveller representatives to ensure that regular meetings with a full quorum take place enabling decisions to be made and substantive progress to be achieved in utilising the available resources in full to deliver on agreed targets.</p>	<p>Due to Covid 19, we did not have a quorum for the LTACC meetings. Wexford County Council is committed to ensure that LTACC will meet every 3 months in person.</p>
<p>WLD's mission and core purpose are underpinned by community development principles and values. These tenets also inform and underpin the two main programmes under which we engage directly with Travellers – the Primary Healthcare for Travellers Programme and SICAP. WLD advocates strongly for an approach to participation in decision making by Wexford County Council which builds on work done to date and enhances the quality and quantity of engagement with a wide cross section of the local Traveller population through facilitated and structured consultation processes rather than placing the burden of participation and representation on the shoulders of a small number of community representatives. WLD recognises the challenges of such an approach however we believe it is essential in order to build good working relationships and achieve greater levels of trust that are necessary for a well-functioning accommodation programme.</p>	<p>Wexford County Council recognises the strong community development work undertaken with the traveller community across Wexford, which is managed by the Local Community Development Committee under the auspices of the Local Authority, particularly through the SICAP programme.</p> <p>The Local Authority as the housing authority, does not rely solely on the LTACC to inform housing decisions, but engages regularly with individual family units to address issues of need. In addition the Local Authority is happy to engage in further consultation processes with traveller representative and propose this should be coordinated through LTACC.</p>

<p>WLD supports the call by other organisations in the original TAP for robust monitoring and reporting on the delivery of the plan, both in terms of targets and the full utilisation of the allocated budget for Traveller accommodation.</p>	<p>Regular progress reports will be provided at the LTACC meetings which will be held every 3 months.</p>
<p>WLD has worked closely both with residents of the halting sites in Bunclody and Marshmeadows, New Ross and with Wexford County Council staff to engage with families living in both locations in order to foster community development. We believe that further investment in a more holistic approach to both sites would result in positive outcomes both for residents and for the local authority in terms of relationship building, cooperation and community engagement. An estate management approach, similar to that employed in other local authority owned estates, has the potential to deliver these improved outcomes. Issues which can cause conflict such as refuse and dumping and general safety including quality of fencing, lighting etc. could benefit from such a preventative approach, focused on collective engagement in arriving at mutually agreeable solutions.</p>	<p>Wexford County Council is in the process of reviewing current allocations in Marshmeadows Halting site, with a view to improving operations. The Council has re-appointed a caretaker and it is noted that working relationships are improving between the tenants and caretaker.</p> <p>It is proposed that additional formal proposals for specific project work, which would support a more holistic approach to the sites mentioned could initially be brought to the LTACC for agreement and subsequently seek funding prioritisation via SICAP.</p>

Appendix 3 – Committees

The following is the current list of membership of the Local Traveller Accommodation Consultative Committee (LTACC):-

WCC Chairperson (Ex-Officio)	Ms Biddy Connors
Ms Elizabeth Berry	Ms Maggie Connors
Ms Mary Connors	Mr James Connors
Ms Nan Moorehouse	Cllr Willie Kavanagh
Cllr Tom Forde	Cllr Kathleen Codd Nolan
Cllr Leonard Kelly	Cllr Jackser Owens
Ms Carolyne Godkin, DOS	Ms Anita McLoughlin, A/SEO
Mr Ray Colfer, HLO	Ms Maria Halvey, Social Worker

Membership of Wexford TAP mid-term review project team:-

- Ms Anita McLoughlin, A/Senior Executive Officer
- Ms Martina Donoghue, Administrative Officer
- Ms Caroline Creane, Senior Staff Officer
- Mr Ray Colfer, Housing Liaison Officer