

Public Consultation

Irish Travellers Accommodation Strategy 2020-25

Please use this consultation template for submitting your comments and responses.

Alternatively, the online consultation can be downloaded at: <https://www.nihe.gov.uk/Working-With-Us/Partners/Consultations>

If you are completing an online version of this template, please email your completed response to: david.glasgow@nihe.gov.uk

Hard copy responses can be submitted to:

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The Housing Executive welcomes any comments you have on the Strategy as a whole or on the topics of particular interest to you.

All responses should be submitted before 5pm on 23rd September 2020 to ensure they can be fully considered.

Freedom of Information Act 2000

Confidentiality of Consultations

The Housing Executive will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Housing Executive can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

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For further information about confidentiality of responses please contact the Information Commissioner's Office (or see the website at <http://www.informationcommissioner.gov.uk/>)

Your details

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The Housing Executive has divided the Strategy into sections for you to comment on:

Objective 1 and key actions 1 -3

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General Comments

The Equality Commission for Northern Ireland welcomes the opportunity to respond to this consultation. We welcome the development of the Strategy, with its five year implementation plan which includes milestones, outcomes and an undertaking to publish an annual progress report. We also welcome the steps that were taken to increase the size of the sample for the 2018/19 Irish Traveller Accommodation Survey.

We are cognisant of the United Nations Committee on the Elimination of All Forms of Discrimination's [Concluding Observation](#) that the United Kingdom should 'Ensure the provision of adequate and culturally appropriate accommodation and stopping sites as a matter of priority throughout the State party' (paragraph 25(b), 2016).

The Commission has recommended, in our [Equality in Housing and Communities](#) policy recommendations that Traveller accommodation needs are met in consultation with the Traveller community. We have advocated the need for an adequate programme of accommodation to meet the cultural needs of the Irish Traveller community. While outside the vires of the NIHE, we remain concerned by the lack of progress in securing planning permission for sites in areas identified as most in need. We welcome that, as per our recommendation, the NIHE sought views on the awareness of accommodation choices available to Irish Travellers, and has a strategic action that Travellers are aware of the full range of Traveller specific accommodation options.

We welcome recognition of the importance of the consideration of the multiple identities which members of the Irish Traveller community possess, and recommend that actions are tailored to meet the particular needs arising from them.

We note the recognition at page 9 that 'fulfilment of these actions depends on a number of critical factors; they require budget availability, partnership working and endorsement by the Irish Traveller Community.' While not completely within the control of the NIHE, these factors can be addressed by

the organisation through its budget bidding / allocation, and how it develops and progresses partnership work and relationship building.

As regards the action plan, we welcome the ambitious outcomes, which require inputs and commitment from a range of internal and external stakeholders. Long term resourcing will be key to the success of the plans, and an undertaking at a senior level to support this resourcing is essential.

We suggest that at page 11, Irish Travellers are added to the list of stakeholders.

Objective 1: To develop a Traveller Specific Accommodation Needs Assessment.

Key actions:

- 1. To review our housing application and housing solution processes to ensure Travellers are aware of the full range of Traveller-specific accommodation options;**
- 2. To continue to develop our ethnic monitoring and record keeping systems, including the collection of data on Irish Traveller communities, to better understand the impact of housing services and to help inform future planning and service provision;**
- 3. To adapt our Housing Needs Assessment methodology to facilitate the assessment of Traveller-specific accommodation needs;**

Your comments:

1. The Commission's 2019 Equality in Housing and Communities policy recommendations call for greater awareness of the rights, responsibilities and housing options relevant to minority ethnic groups, and therefore welcomes the commitment to ensure that Travellers are aware of the full range of accommodation options open to them.
2. We welcome the focus on data collection and gap analysis. We recommend that the NIHE ensures that IT systems are equipped to use and report on any additional data that is collected, and that the uses made of additional data are published in the annual report. We welcome the intention to consider the impact of the multiple identities held by Travellers, and to use housing solutions to capture hidden and latent demand.
3. As regards assessment of Traveller-specific accommodation needs, we recommend that the latent demand study considers if the decline in nomadism is linked to the lack of transit sites.

Objective 2: To provide safe and culturally appropriate accommodation for Irish Travellers to reside and travel to.

Key actions:

- 4. To undertake a review of transit sites to establish, through a generated needs assessment, the existing and future demand for transit sites in NI within the Irish Traveller community;**
- 5. To undertake a strategic review of all our Traveller sites to identify options for their future improvement or replacement. We will also review the current emergency halting, transit or serviced site classifications for each of our sites to ensure they reflect how the sites are being used in practice;**
- 6. To investigate the potential to work with our stakeholders, in particular DfI, DfC and Councils, on how fitness standards for caravans might be defined and enforced for the benefit of Travellers;**
- 7. To work with Housing Association partners and other stakeholders to promote compatibility within the Traveller community as a means of maximising existing and future Traveller-specific accommodation;**

Your comments:

4. As regards the 'generated needs assessment', it is unclear which factors would be considered as part of this process. As regards demand, it is noteworthy that only 56% of those respondents to the 2018/19 Traveller Accommodation Survey who lived on sited accommodation expressed satisfaction with their current accommodation. This should be borne in mind in assessing the reasons for the significant majority of Irish Travellers surveyed by NIHE living in settled accommodation. We recommend that Traveller focus groups are convened, including with the assistance of Traveller Support Groups, to discuss the approach to the review of transit sites. It is essential that Traveller voices are heard and taken into account in planning the review, including the wording of questions, in light of the importance of this exercise to Traveller culture.

Objective 3: To support the Irish Traveller community to remain in their accommodation of choice through easily accessible housing services.

Key actions:

- 8. To undertake a review of floating support funding for Traveller support groups working to improve housing outcomes for the Traveller community;**
- 9. To look at ways to promote our housing services to raise awareness among Irish Travellers of the levels of service they should expect to receive and to support them in making a complaint if they are not satisfied;**
- 10. To keep the training needs of our staff in respect of the Traveller community under review, including the development of an eLearning package for all our staff, to further raise Irish Traveller cultural awareness;**

Your comments:

8. It would be helpful to have greater detail on the scope of the review of floating support, and we recommend that terms of reference are published, as the current undertaking as set out above is unclear as to the purpose of the review.

10. We welcome the commitment to ensure that staff are culturally aware, but suggest that the training provide extends beyond solely an e-learning package and should include the involvement of Travellers and Traveller Support Groups in the provision of training.

Objective 4: To create mechanisms that foster good relations for the Irish Traveller community.

Key actions:

- 11. To introduce proactive approaches to ensure Travellers are safe and welcomed within their choice of accommodation;**
- 12. To seek to expand our partnerships working with relevant stakeholders to effectively implement this Strategy;**

Your comments:

11 / 12. While welcoming the intent of these actions, there is a lack of detail around what, for example 'proactive approaches' means. It is therefore difficult to assess the likely impact of any actions taken forward.

We suggest, with regard to paragraph 12, the wording of the action should include: 'including a particular focus on partnership with the Traveller community.'