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EUROPEAN SOCIAL CHARTER

Comments on the 18th National Report of Ireland on the
implementation of the European Social Charter
submitted by

THE IRISH TRAVELLER MOVEMENT

Follow-up to collective complaint:
European Roma Rights Centre (ERRC) v. Ireland No. 100/2013

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**Comments on Ireland's 18th National
Report on the implementation of the
European Social Charter July 2021**

Submitted by the Irish Traveller Movement

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Background

Founded in 1990, the Irish Traveller Movement is the national advocacy and membership platform which brings together Travellers and representative organisations to develop collective solutions on issues faced by the community to achieve greater equality for Travellers. We represent Traveller interests in national governmental, international and human rights settings. We challenge racism- individual, cultural and structural which Travellers face and promote integration and equality. We are led by our grass roots community membership, deliver expertise in shaping organisations locally and promote community leadership ensuring Traveller's voices are to the forefront of all discussions.

We are mandated by our membership of over 40 local Traveller groups to bring forward policy and related matters to national structures and are represented on national government led fora and strategies and across National Traveller policy, health, mental health, policing, accommodation, education, anti -racism and in equality, anti-racism, community and children's rights bodies.

The Irish Traveller Movement welcome the opportunity to submit to the European Committee of Social Rights ("the Committee") on the implementation of the European Social Charter ("the Charter") in respect of the Government of Ireland National Report December 2020.

We refer in this submission to the Collective Complaint 100/2013: European Roma Rights Centre (ERRC) v. Ireland

The basis of the first ever Traveller Complaint to The European Committee of Social Rights was grounded in data supplied by the then Irish Traveller Movement Independent Law Centre and taken in conjunction with the European Roma Rights Centre and set forth the widespread failure on the part of the State to provide Traveller-specific accommodation, while simultaneously introducing increasingly regressive evictions legislation. In May 2016, the Committee concluded there was a violation of Article 16 of the Charter due to the failure to provide sufficient accommodation for Travellers, the inadequate conditions of existing Traveller sites, and the inadequate safeguards governing Traveller evictions.

We refer also to the Committee's findings in 2018 and 2019 that the State remained in violation across those grounds and again in 2020, with notable exception to some progress in the provision of accommodation, access to housing and refurbishment of Traveller accommodation, but a still substantial shortfall in the provision of accommodation for Travellers.

This submission reflects the continued and outstanding concerns related to nonconformity in 2020/2021.

Established shortcomings and current road map

The Government commissioned Expert Review of Traveller Accommodation ⁽¹⁾ July 2019 found '(local authorities) failed to meet the full scale of accommodation need among the community, 'evidenced by the extremely high rate of Traveller homelessness, the increase in numbers of Traveller households sharing accommodation and living in overcrowded conditions, and the uneven record of delivery of Traveller-specific accommodation among local authorities and 'also by approved housing bodies'.

- The first phase of implementation of the 32 recommendations supported by Government and endorsed by the Traveller sector, encountered significant delays due to a change of Government and the late appointment of the Minister with responsibility, coupled with the demands of covid19 in 2020. Some progress and commitments undertaken have given confidence that ambition is being realised, at a slow pace, and the Programme Board to oversee actions has met 3 times.

Lack of Central Oversight and No Redress of Structural Barriers

National Traveller Accommodation Programmes (TAPs) were signed into practice in December 2019.

There is no central oversight body to monitor or safeguard against current and future delivery failure and these Programmes are the only delivery model being pursued, despite the failings identified by the Expert Group Report

with a recommendation to centralise an independent body to oversee delivery. Self-regulation is the norm, without a requirement to account for lack of planning, delivery or spending.

- An audit of those Programmes shows widespread inconsistencies in assessing Traveller need, in targets set, with no redress for emergency or homeless needs, under planning of culturally appropriate accommodation and transient sites, and inadequate planning for future growth by local authorities.
- There is overreliance within plans on private rented accommodation, and the Housing Assistance Payment as modes of delivery.

Structural barriers

- **The Office of the Planning Regulator**, established in 2019, is not a policy making body, is without regulatory enforcement and does not oversee the planning functions of local authorities. And Traveller Accommodation Programmes are not aligned to national and county plans as a matter of course ⁽²⁾.
- Traveller accommodation is not grounded in the **Social Housing Construction Projects Status** Reports.
- **Without quality and maintenance oversight**, local authorities have relied on weak structures using the informal and inadequate process of obtaining feedback through site caretakers. Where maintenance requests are long fingered with many families citing discrimination as a contributory cause. The Expert Group recommended a review of the role caretakers. ⁽¹⁾
- **Nationally, regionally and locally**, the Expert Group review identified 12 problems in the Planning Process. ⁽¹⁾ However, Traveller accommodation planning is not included in the evolving **National Development Plan, underpinning Ireland's National Planning Framework** or in County and City Development Plans. Traveller NGOs and parliamentarians have sought assurance from Government for inclusion, but this has not been advanced.
- **Planning-Part 8**: Currently there is no provision for Traveller accommodation by means of direct route planning permission, unlike other social housing, and a review of Part 8 of legislation called for by the Expert Group has not yet been approved on the Government side. ⁽¹⁾
- **Land Allocation**: Traveller accommodation was not included in the Land Development Agency Bill, brought forward by Government. Following advocacy by the Irish Traveller Movement it now features in the Act where (a) *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.* ⁽³⁾

Systemic obstacles

- **Insufficient data**: According to the Department of Housing, Local Government and Heritage, (DHLGH) (last available data 2019) there were 10,809 families which equates to approx. 45,397 to 57,287 people nationally, depending on how data has been collected. Some councils count families and other households, for annual assessments of need. (The Census 2016 finds Traveller family size ratio 4.2 people and households 5.3 people) ⁽⁴⁾. Therefore, establishing accommodation need nationally is problematic and worsening the crisis due to an underestimation of the need to supply, coupled with supply pressures in all housing.
- **The Social Housing Needs Assessment** was also found to be inadequate to the task and its overhaul a central short-term recommendation of the Expert group. ⁽¹⁾ The inclusion of an ethnic identifier in the "form" is currently being considered.
- **Underspending over continuous Programmes (TAPs)**, remains a concern. Between 2008 and 2019 €72 million was underspent and coupled with substantial cuts to **government investment** from €120 million for the first TAP (2000-2004) down to €33 million for the 2014-2018 programme ⁽⁵⁾ and the annual budget reduced from €40 million in 2008 to €14.5 million in 2020
- **Drawdowns** From 2016 -2020 ⁽⁶⁾ show only €38.5 million was drawdown across the 31 local authorities in total. A change in drawdown procedures in 2020 may reduce underspending but is operating in isolation.
- a) There is no central oversight of the spend required by the delivery targets set in programmes, to promote delivery where pace is slow, intervene where no budget has been requested, or induce statutory powers for requirement in the planning framework.

- b) Spending of the whole budget in 2020 must be viewed in the context of low ambition to deliver by local authorities, and where new builds only accounted for (16 units) 7 housing and 9 service units nationally⁽⁷⁾
- c) 5 local authorities did not draw from the capital fund for 2020 despite a combined current need of 301 units in those areas.
- d) € 4,4 million of the €14.5 million in 2020 was used to supply basic sanitation and supports during Covid-19, such as toilets, water, electricity and temporary self-isolation units.
- e) According to reporting to the National Traveller Accommodation Monitoring Committee, to June 2021, just 2.4 million has been drawn down of the 15.5 million capital budget, and no mid term review to redress lagging authorities.
 - o **Delivery not meeting needs.** Many councils don't plan to meet their own current targets to supply, without national oversight, and current Programmes show again consistency in under delivery trends.
 - o From 2000-2018 local authorities delivered 68% of total delivery planned⁽¹⁾. And only 10% of units delivered in the last 5 yr. TAP was supplied through Traveller specific accommodation, 42% across Standard Housing and 21% using HAP and RAS findings from the ITM audit of TAPs.⁽⁸⁾
 - o **Current Need:** Approximately 31% of Traveller families (2,871) are recorded across (30 of the 31 local authority TAPS as currently in need of accommodation and 12 local authorities show they won't meet either **the current** and the **projected targets** during the 5-year TAPs. Of the 3,060 units planned nationally 15% will be for Traveller Specific accommodation, and over 50% provided using Standard Social Housing, Private Rented, using housing assistance payments such as HAP/RAS and through Approved Social Housing Bodies.⁽⁸⁾
 - o **Future proofing** to avert further accommodation crisis: The Traveller Accommodation Act 1998 requires local authority Programmes to take account of the future need of Traveller families and of the 26 authorities who provided data it showed a need nationally for 1,400 new family formations⁽⁸⁾. 31.9% of 15-29-year old Travellers are married compared with (5.8%)⁽⁹⁾ nationally. While many local authority programmes acknowledged this, they did not cater adequately in their projected targets for future growth with 5 not providing targets **and** 13 who did, will not meet those needs during the 5 years, according to their completion figures.
 - o **Transient Sites** There is no provision in any of the 31 Programmes to supply transient accommodation.⁽⁸⁾

Inadequate, unsafe and impermanent conditions.

- o A low estimate, due to data inconsistencies and systemic shortcoming by local authorities in recording, shows over 1,700 families (approx. 7,00 – 9,000 people) are living in inadequate, unsafe and impermanent conditions stacked against their health, education, employment and life opportunities, well below basic human rights standards.⁽¹⁰⁾
- o Of the 952 families living in Local Authority Halting sites, 350 families only have access to an outside cold tap, no electricity most reliant on sharing a port also or outside toilet with other families.
- o 311 families are living on Unauthorised sites including on roadsides, public and private lands, where some have access to a cold tap, no electricity or toilet, and 218 have no services at all.
- o The investigation by the Ombudsman for Children⁽¹¹⁾ of a Cork based halting site where 38 families are resident which was originally designed for 10, found, approximately 140 people using toilets and washing facilities designed for 40 people and evidence of children sleeping on makeshift beds cramped into the living/dining spaces and highlighted the unreliability, and lack of basic facilities such as heating, lighting, and hot water. This council drew down under €2million of their Traveller accommodation budget for the combined 5 yrs. 2016-2020, with 533 families in need in 2019.

Overcrowding and neglect:

The **poor condition** of sites must be viewed in the context of overcrowding and the lack of delivery broadly, especially of Groups Housing Schemes, as well as the structural apathy preventing more rigorous maintenance of sites, and deficiency in building quality.

1. Some councils acted to reduce overcrowding on sites in 2020 due to covid 19 through new serviced mobile homes and fast-tracking housing applications, where a preference, but most did not alleviate very overcrowded large sites.
2. Sites are not viewed as originally planned, for smaller occupancy, and local authorities have not sufficiently allowed for future growth. Without standardised and adequate data collection it is not possible to accurately assess future need nationally.
3. The report of the **Irish Human Rights and Equality Commission** via equality reviews of local authority provision to Travellers – (July 14th, 2021) found institutionalised and systemic failure and a consistent undermining of Travellers' accommodation needs.⁽¹²⁾
4. **The Housing (Standards for Rented Houses) Regulations 2019** currently does not include halting sites, transient, temporary and permanent halting sites in its remit.
5. **Structural quality:** According to the Government Review of Funding Report 2017 it showed 11% of Traveller accommodation properties demolished were built 12 – 16 years ago, suggests a significant rate of deterioration, and of systemic undervaluing.
6. **Traveller housing neglect:** 1,000 families are sharing with one or more others in local authority provided Standard Housing, the extent of the problem has been seriously neglected. This is most likely an underestimate due to fears of being identified as unofficial tenants in some cases, with the subsequent threat of eviction.
7. **Overcrowding:** At Spring Lane, Cork City, 45 families live on a 10-bay site and St Anthony's Park 33 families on a 16-bay site. The provision of mobile homes to ease overcrowding was delayed for some months during covid, despite the severe overcrowding and families provided with portable toilets, were advised they must be returned after the pandemic despite having no other access to a toilet than where shared with another family.
8. Travellers in unofficial situations on official sites are still charged rents in some instances, without having security of tenure or facilities of their own.
9. Travellers pay excessive prices for basic services not available on site. One large family in Meath on an unofficial site pay up to €80 a week on laundrette services.

Homelessness

1. Traveller families are overrepresented, and yet most are not counted within TAPs, and not collected by ethnicity in the (homeless data) Pathways System. Given discriminatory access to private rental accommodation and inadequacies of social housing availability, they account for 10% in emergency accommodation nationally and as high as 50% in some counties. Some families are four years in emergency accommodation, miles from their hometown, driving 80-kilometer round trips to keep their children in school.
2. Thousands more families are trapped in **hidden homelessness** caused by grossly inadequate and overcrowded accommodation. Despite comprising 1 per cent of the population Traveller children accounted for 12% of the homeless children residing in emergency accommodation⁽¹³⁾

Pace of progress Traveller specific accommodation

Case samples: Limerick City and County Council Traveller Accommodation Programmes 2014-2018 and 2019-2024

Bawneys Bridge Residential Caravan Park.

During the 6 years to date across two Limerick City Council TAPs accommodation has not be delivered despite needs identified as follows “Nine (9) family’s resident on the site have indicated that they would like to be accommodated in a Group Housing Development. The feasibility of this will be investigated in consultation with the families. The proposal for any new development will be dependent on available funding. The families will also be supported to avail of accommodation under the generic housing support options.” The only change recorded in the current TAP showed “The Council will continue to work with families by actively **identifying land** or generic housing to meet their accommodation needs.”

Long Pavement

In the Traveller Accommodation Programme 2009 -2013, Limerick Council recommended of a site which consisted of 17 temporary bays. “This is a temporary site and it is not possible to provide a permanent accommodation solution for the families at this location”; “a site be identified to facilitate the provision of permanent Group Housing for these families. This has not been completed in the timeline or in the next programme (2014-2018), and has so far not been completed in this programme

Discrimination in Practice

Pandemic exposure: Travellers are extremely vulnerable to covid infection with higher occurrence in the community of chronic diseases and conditions deemed at “risk” and exacerbated by inadequate living conditions. Despite government supports, local authority implementation of these were inconsistent given the evident and disproportionate outbreaks in the community

Between March 1st, 2020 and April 10th, 2021, there were 5,226 COVID-19 notifications among Travellers (169/1000 population) and 235,710 in non-Travellers (50/1000 population). 20% of outbreak associated Traveller cases were linked to halting sites. ⁽¹⁴⁾

On site conditions identified during Covid in 2020

- **High prevalence of families forced to live in day units** (originally designed as very small structures, adjacent to a trailer for cooking and with toilet facilities), as an alternative when a trailer becomes dilapidated and unsafe. In 2020 an elderly man receiving treatment for cancer and a family of 10 were effectively living in a one room structure.
- **Families are sometimes assigned empty bays on halting sites**, i.e. without provision of a mobile home or caravan, evidenced last year in Dun Laoghaire Rathdown.
- **Leaks through windows and ceilings, rotting floors**, dampness are frequently reported in trailer accommodation and there is a reported lack of supply of good quality mobiles available for purchase in some local authority areas, for example Cork City, where budgets allowed have been set too low to meet adequate full-time living standards.
- **Infestations** of rats and mice are frequently reported, a risk to mental and physical health.
- **Storms** in recent years, for example Storm Ellen in 2020, led to damage of trailers on several sites, including in Cork City, where families waited, in some instances, several months for replacement.
- In Cork County, **electricity supply** was so weak on a site it could not be safely used to power electric heaters and other essential items. Families were reliant on expensive gas heaters which cause a build-up of condensation and increased risk of mould developing.
- Local authorities **refuse to provide generators** due to perceived health and safety issues, meaning families left without a stable electricity supply, even in cases where essential medical equipment such as nebulisers are required.
- When local authorities **fail to plan for future need evident nationally**, green spaces on sites are often used to facilitate extra trailers. This means there is often little or no green space for children on the sites to play safely.
- **Disability:** Many instances where families are waiting long periods for upgrade works on sites to facilitate a disability or additional need. One example, a man who was waiting years for a walk-in shower to be provided, essential for his medical hygiene treatment. Almost (20%) of Travellers have a disability. ⁽⁴⁾

Discrimination in policy

1. **Thresholds:** Many Traveller families are statistically likely to have larger family sizes. This has led to situations where families reliant on social protection payments as their sole income still find themselves over the income threshold for social housing. Results of a government review has been released (19/4/2021), indicating a change to reflect the position of larger families but despite these changes there are still some families who find themselves marginally over the threshold and thus excluded from availing of social housing supports.

2. Social Housing Needs Assessment is found to be inadequate and the review to provide an ethnic equality question and accord to the Public Sector Equality and Human Rights Duty, has been delayed. This question is critical to ensure Traveller homelessness is captured and remedied nationally.
3. Refurbishments versus new builds: There is a clear proportion of Travellers who opt for social and standard housing provision, including many families who have reduced their expectation of living in Traveller specific accommodation, advised by their local authority that option is not a realistic choice based on the length of time to build and lack of available land. Refurbishments accounted for 54.1% of output between 2006 and 2018, rather than new output, still evident in current TAPs. ⁽¹⁾

Eviction without adequate legal recourse

The situation of Traveller evictions brought forward in the original Collective Complaint, and of concern to the Committee, are still ongoing. Travellers continue to be disproportionately affected, and the related legislation, unevenly impacts given nomadic traditions and worsened by the widespread under delivery of Traveller accommodation across all types.

Covid: Emergency legislation enacted to mitigate against evictions in Ireland during the pandemic, did not include Travellers in Government drafting, given their greater experience to be evicted. There was however guidance issued to Local Authorities recommending against undertaking evictions during the pandemic. The Irish Traveller Movement advocated with political groups and secured Travellers were named in the Act, but it was without Government support, The Residential Tenancies Act 2020 ⁽¹⁵⁾. The subsequent similar legislation did not however include the same protections for Travellers other than where resident in the private rented sector or in approved housing body tenancies. ⁽¹⁶⁾ During that period Travellers were evicted / or threatened with, causing avoidable hardship and risk.

Legal Recourse: In 2020 following philanthropic funding sourced by Traveller groups, a Traveller specific legal aid lawyer was appointed to work in the Free Legal Aid Service. Approx. 31% of all calls in 12 months (2020 / 2021) to the Centre, were eviction related. Despite legislation in place for a part of that period during covid. **Example: In March 2021** a family of 9 were served a warning to vacate private lands they had resided on for seven years. The family had difficulty securing legal representation and options of alternative accommodation were not provided by the Council

Other samples of evictions during covid:

- o Dublin City Council: In August 2020 there was a threatened eviction by Dublin City Council of a young Traveller family (a mother and two young children one of whom has autism), from a mobile in Ballyfermot. Through interventions from Local Traveller organisations and councillors the eviction was cancelled.
 - o In the South East two young couples and their young babies were served notices from a private car park in early December, with nowhere to go. They were not deemed homeless by the Council when they tried to register and given only temporary accommodation over Christmas
 - o In the north east in November 2020 a couple were served with notice for a caravan they were living in adjacent to the man's mother's home (which was standard social housing). Gardai came to ensure the caravan was moved. Agreement was reached through dialogue with the council, to remain temporarily.
- a) **The lack of an eviction register** to determine extent of Traveller evictions remains outstanding, undermining the problem and preventing adequate redress.
 - b) **Travellers access to Justice remains limited, with** no recourse under the Legal Aid scheme when served with eviction notices due to restrictions under s.28 (9) of the Civil Legal Aid Act 1995. No State resourcing has been advanced for a Traveller specific Independent Law Centre.
 - c) **The Criminal Justice (Public Order) Act, 1994**, amended by Section 24 of the Housing (Miscellaneous Provisions) Act, 2002 provides for the eviction of persons without alternative accommodation, and is without an appeals procedure. Despite the impact on children and those with a disability.
 - d) **Section 19 (c) of Part II A of the Criminal Justice (Public Order) Act, 1994**, is without any form of judicial oversight, monitoring or intervention. In effect this legislation has prevented nomadism and curtailed a central cultural right.

- e) **The current eviction procedure, which allows for the removal of families within 24 hours**, is inhumane and often conducted at times when families cannot access legal services, such as on Friday afternoons. This is not possible without access to a dedicated service, and many families would not be familiar with legal services or have finance to seek private legal services.

Transient provisions

- f) There are fewer than 50 Transient sites in the republic and almost all are in use for emergency accommodation and no local authority has made provision within their current TAPs.
- g) For Travellers who have been moved into Private Rented, they are further disadvantaged as deemed to have their needs met there, they no longer qualify on paper for Traveller specific accommodation and move down to the end of the list, if later needed. Many families can't access Private Rented and are 22 times more likely to experience discrimination in doing so, in the first place. ⁽⁸⁾ **Example in Dublin during covid** Homeless families were advised by homeless services they can no longer use the "self-locate" (self-identify accommodation in hotels and B&Bs) and to return to their parents' homes, leading to these families sleeping in cars.
- h) Only a very small proportion of social housing and private rental stock consists of large dwellings which would be suitable to accommodate larger Traveller families. (The average family size is 5.3 persons.) This means when a tenancy is due to end, families cannot access another rental property, and many have then been rendered homeless, and face eviction.

Recommendations to the State

Implementation and Governance

1. That the violations found in respect of Article 16 of the Charter on the 5 grounds for Travellers be remedied
2. Implement all recommendations of the Report of the Expert Review Group on Traveller Accommodation with a time lined implementation plan, tangible targets, corresponding accountability measures and budget.
3. That Traveller accommodation be grounded in the National Development Plan, City and County Plans, in the Quarterly Pipeline Report and included under the Land Development Agency.
4. The establishment of an oversight body, National Traveller Accommodation Authority to oversee the delivery of Traveller Accommodation

Planning

1. Expedite the national Traveller accommodation audit, in consultation with the community, which will provide a coherent and transparent analysis of the scope of need.
2. Social Housing Needs Assessment is found to be inadequate to the task / overhaul of the Assessment
3. An amendment to the Planning and Development (Housing) and Residential Tenancies Act 2016 to be introduced immediately to circumvent the Part 8 process away from the local political system and invested in an An Bord Pleanála.
4. That the role of the new Planning Regulator is availed of on Traveller specific proposals
5. That Traveller specific accommodation be provided under the Single Stage Planning process

Legal Repeal and Remedy

1. Repeal of Section 24 of the Housing (Miscellaneous Provisions) Act 2002 prohibiting nomadism, a core element of Travellers culture and way of life.
2. The use of emergency powers to relieve homelessness and inadequate overcrowded provision is central to redressing some level of basic requirement to Traveller families in need
3. Provision of a network of transient halting sites in each local authority area for short stays that would be exempted under Section 4 of the Planning and Development Act 2000.
4. Introduce both Transfer arrangements, and the Passport System between local authorities for Travellers.

Addressing Barriers

1. Urgent adoption of the universally inclusive ethnic identifier and collect data on Travellers.
2. Redress of Local Authority policy in relation to family size dwellings pro rata to Traveller size norm
3. Redress of policy re HAP and RAS, where Travellers are removed from Traveller specific need.

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