

Submission to Joint Committee on Key Issues affecting the Traveller Community

Access to Housing and Accommodation

February 2021

Introduction

Focus Ireland welcomes the opportunity to make a written submission to the Joint Oireachtas Committee on Key Issues affecting the Traveller Community. Focus Ireland has been the leading NGO working with homeless families for over 30 years and has extensive experience across the country and in different contexts. We operate the Family Homeless Action Team (on behalf of the Dublin Regional Homeless Executive) and offer Advice and Information services via our coffee shop on Eustace Street in Dublin, the Family Centre on Mountjoy Street, and services located in Kilkenny, Waterford, Wexford and Limerick. We have also operated supported temporary accommodation for families with high support needs for many years and run Housing First services in the Cork and Limerick regions. In addition, Focus Housing Association (the AHB arm of Focus Ireland) acts as landlord to a number of families who would find it difficult to maintain a tenancy with other social or private landlords, with Focus Ireland providing tenancy support.

In the course of our work, we regularly support households from the Traveller Community who are facing homelessness and experiencing difficulties accessing mainstream accommodation. Our submission will draw on this experience and expertise and will focus on issues relating to access to emergency accommodation and housing supports, which are particular to households from the Traveller Community. If we look at the various ways in which the Traveller Community is marginalised in respect of accommodation, health, disability, educational and employment attainment, and the long history of discrimination against Travellers, a strata effect of marginalisation becomes quite clear. There are layers to these various inequalities within this group and these cumulative factors lead to difficulties access to housing.

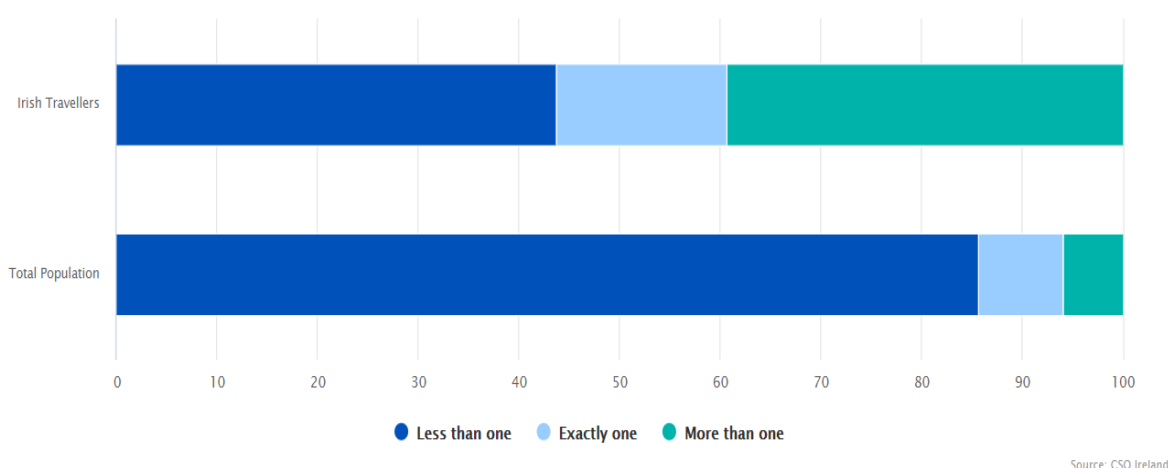
There is a big gap between Travellers' housing and cultural needs and the availability of appropriate accommodation for this group. While many of the issues we will raise are also experienced by households not from the Traveller Community, the multiple levels of marginalisation put the Traveller Community at

particular risk of (a) an experience of homelessness; and (b) difficulties accessing homeless services and later exiting homelessness.

1. An Absence of Specific Data

Census data from 2016 shows that Irish Traveller households had a lower home ownership rate than the general population, with 1 in 5 (20%) households owning their home compared to over two-thirds (67.6%) for the general population. Overcrowding in accommodation was also notable, with nearly two in five Irish Traveller households (39%) having more persons than rooms compared with less than 6% of total households in Ireland.

Figure 2.6 Permanent households by persons per room, Irish Travellers and total population, 2016



While Irish Travellers make up less than 1% (0.66%) of the population, they account for nearly 8% (517 out of 6,906) of homeless people according to the 2016 Census. Research carried out by IHREC and the ESRI in 2018 found that this figure is closer to 9%.¹

Despite this notable difference, there continues to be a persistent lack of data in respect of the Traveller Community's experience of homelessness. The specific needs, accommodation patterns, pathways into homelessness and distinct characteristics of the Traveller Community need to be identified, monitored and analysed in order to facilitate reforms to the current policy approach. The Expert Report on Traveller Accommodation published in July 2019 included a call for:

“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

¹ Grotti, Russell, Fahey & Maitre (2018) 'Discrimination and Inequality in Housing in Ireland', <https://www.ihrec.ie/app/uploads/2018/06/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

detailed information on Travellers' mobility patterns, family formation, existing accommodation tenure and conditions, and future accommodation preferences.”²

The monthly homeless reports published by the Department of Housing, Local Government and Heritage do not distinguish households from the Traveller Community. There is also a lack of qualitative research and information on the experiences and the impact inappropriate housing for their needs is having on the Traveller Community. This lack of data leads to a situation where households from the Traveller Community can experience more difficulties accessing emergency accommodation and can spend longer periods of time in emergency accommodation due to difficulties sourcing appropriate alternative accommodation.

Focus Ireland recommends that all housing application forms (including the local authority social housing assessment and HAP applications) include an ethnic identifier which would allow for the collection of data in respect of the specific needs of the Traveller Community and which would allow for fuller analysis of the ways in which our current approach to homelessness is disproportionately impacting this community.

2. Key issues affecting the Traveller Community in accessing housing and homeless accommodation

In our experience, many of the issues which affect the Traveller Community are also experienced by other groups; however, the striking aspect is that households from the Traveller Community often face all of these issues at once. This creates an additional complexity when supporting this group, with support needs often higher than for other households in a similar position. Mapping this higher support need and ensuring that an appropriate level of caseworker assistance is in place will help to resolve the greater complexities faced by these households when seeking housing.

The following is a list of key issues, identified from our case work and the experience of frontline staff, which place Traveller households at higher risk of experiencing homelessness or becoming trapped in homeless services. This list is by no means complete and, again, we would highlight the need for comprehensive research in this area as recommended by the Expert Group on Traveller Accommodation.

a) Private rental market as primary pathway out of homelessness

Increasing reliance on private rental accommodation (via HAP/HHAP/RAS) as a route out of emergency accommodation presents particular difficulties for households from the Traveller Community. The highly competitive nature of the private rental sector, the size of available units, the geographic location of rental

² Traveller Accommodation Expert Review, July 2019, page vii

units, requirements of rental histories, as well as discrimination on the part of prospective landlords, all combine to create particular barriers for the Traveller Community.

Almost 75% of exits from homelessness are via HAP tenancies currently, which means that private rental tenancies are a far more common pathway out of homelessness than local authority or AHB accommodation.³ However, for the reasons outlined above, HAP is often not a realistic option for such households, leaving them at risk of becoming trapped in emergency accommodation for long periods of time. While the HAP scheme has provided routes out of homelessness for households in 2020, there are an increasing number of single person households and families with more complex needs spending long periods of time in homelessness. Front-line experience suggests that, in part, this is due to households from the Traveller Community experiencing greater levels of discrimination in the private rental market. They are almost ten times as likely to report discrimination in access to housing, even after education and labour market status are held constant.⁴

a) Social housing stock and family size

Unsurprisingly, this means that, in 2016, 48% of Traveller households were social renters (local authority or voluntary housing body) compared to 9% of all households/individuals. The discrimination faced by the Traveller Community means that local authorities typically prioritise Traveller households on Housing Lists for mainstream accommodation, as well as operating separate lists for traveller-specific accommodation. However, given the lack of mainstream social housing, as well as the severe shortage of Traveller-specific accommodation, this priority in theory does not always compensate, in practice, for the lack of access to the private rental market or an inability to secure home ownership. For example, in 2019, of a total over almost 850 Band 1 lettings only 18 households with Traveller priority on the Dublin City Council waiting list received a letting.⁵

One of the problems is the shortage of social housing stock of accommodation large enough to accommodate larger families. More than 1 in 4 Irish Traveller households had 6 or more persons compared with less than 1 in 20 households in the State overall.⁶ Within the Traveller Community, it is common to marry and form new family units at a younger age, resulting in a high growth rate in the number of families, which in turn increases

³ [gov.ie](http://www.gov.ie) - Homeless Quarterly Progress Report for Q4 2020 (www.gov.ie)

⁴ Grotti, Russell, Fahey & Maitre (2018) *'Discrimination and Inequality in Housing in Ireland'*, <https://www.ihrec.ie/app/uploads/2018/06/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

⁵ [HOUSING REPORT JANUARY 2020.pdf \(dublincity.ie\)](#)

⁶ [Irish Travellers - Socio-economic Aspects and Housing - CSO - Central Statistics Office](#)

the demand for housing. Only 4% of new social housing units in Dublin City Council and Cork City Council areas comprised four or more bedrooms.⁷

This can result in larger families becoming trapped in emergency accommodation while they wait for a unit to become available. Even where Traveller households have priority for allocations, they will not necessarily be the first to receive an available unit due to the nature of the social housing stock. Simply put, the social housing stock is often too small to accommodate larger family sizes so such families are skipped on the list. In order to address this problem, it's crucial that local authorities ensure new social housing projects reflect the demographic needs of those currently on their social housing lists.

b) Establishing local connection;

The requirement to establish a local connection when applying to a local authority for housing or emergency accommodation presents a serious barrier to access for the Traveller Community. The local connection test is applied regardless of a person's background, but it can have a stronger impact on the Traveller Community due to their distinct cultural identity and the nomadic lifestyles of .⁸

Due to the delegation of responsibility for homelessness to local authorities, it can be difficult to facilitate any movement needs or any requirement of geographic flexibility which may present for a household accessing homeless services or needing to transfer between different local authority housing lists. Again, this is an experience common to all households but the effect can produce particular hardships for the Traveller Community due to the distinct cultural identity of this community. A rights-based approach would allow for greater flexibility on geographic placement and transfers between housing lists.

Focus Ireland recommends that a review of the application of the local connection test by local authorities is carried out. We also recommend that, in accordance with the Public Sector Duty under section 42 of the IHREC Act 2014⁹, local authorities should have regard to the potentially discriminatory impact of such a requirement on the Traveller Community.

c) Overcrowded conditions/unserviced sites;

⁷ Spending Review 2020 Analysis of Social Housing Build Programme COLM FARRELL AND DANIEL 'CALLAGHAN HOUSING, LOCAL GOVERNMENT AND HERITAGE VOTE, AND IGEES UNIT OCTOBER 2020, see page 13, table 5. (<https://igees.gov.ie/wp-content/uploads/2020/11/Analysis-of-Social-Housing-Build-Programme.pdf>)

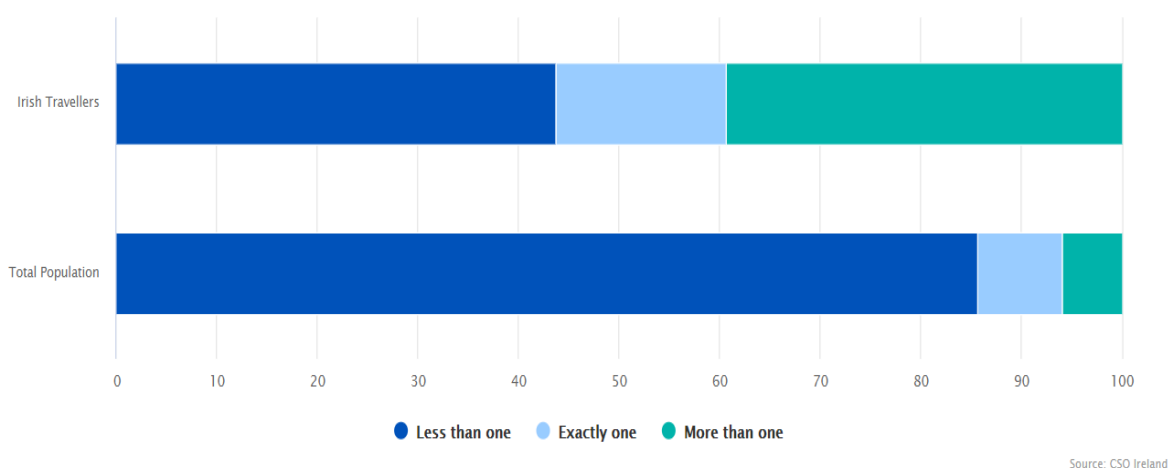
⁸ [A Brief History of the Institutionalisation of Discrimination Against Irish Travellers - Irish Council for Civil Liberties \(iccl.ie\)](#)

⁹ [Irish Human Rights and Equality Commission Act 2014, Section 42 \(irishstatutebook.ie\)](#)

One of the main pathways into homelessness reported to Focus Ireland is overcrowding in accommodation or an untenable situation where a household was living in an unserviced site or caravan and could not remain there on health and safety grounds.

This is reflected in available data which shows that Traveller households are much more likely to experience overcrowding. Nearly two in five Irish Traveller households (39%) had more persons than rooms compared with less than 6% of all households.¹⁰

Figure 2.6 Permanent households by persons per room, Irish Travellers and total population, 2016



The under provision of Traveller-specific accommodation exacerbates such situations, as does the continuing prevalence of unaffordable rents and the lack of available or appropriate social housing.

d) Literacy

In our experience, issues with literacy can affect people's ability to engage with housing applications and can lead to distress and frustration when attempting to navigate bureaucratic systems such as the housing list. Additional time and support are needed to ensure that literacy is not a barrier to accessing housing; however, such support is often not available. Again, this reflects the ongoing structural disadvantages which the Traveller Community face and need to be proactively addressed. CSO figures from 2016 show that just 13.3 per cent of Traveller females were educated to upper secondary or above compared with 69.1 per cent of the general population and nearly 6 in 10 Traveller men (57.2%) were educated to at most Primary level in sharp contrast to the general population (13.6%).¹¹ The data, as well as frontline experience from case

¹⁰ Irish Travellers - Socio-economic Aspects and Housing - CSO - Central Statistics Office

¹¹ Irish Travellers - Socio-economic Aspects and Housing - CSO - Central Statistics Office

workers, show that literacy may be a problem when seeking to access housing and homeless services. Knowing this, additional supports should be made available where they're needed.

The national policy to shift to "choice-based letting" of social housing offers many advantages in better matching need to the available stock, but, without appropriate supports, it can have the unintended effect of further marginalising households who have literacy problems or are experiencing difficulties accessing services.¹²

Conclusion

Focus Ireland believes that housing and homeless policy must take account of the particular demographics and characteristics of vulnerable and minority groups. It must be designed to allow sufficient flexibility to accommodate and respect the rights and requirements of minority groups and their distinct identities. Laws, policies, circulars, rules and schemes can be indirectly discriminative if they fail to consider and properly address the disparate impacts which a particular law or requirement has on a minority group. All public sector agencies are required under the Public Sector Duty to consider the human rights and equality impacts on statutorily protected groups, which includes the Traveller Community. In the area of housing and homelessness, Focus Ireland would welcome greater engagement from statutory agencies and public bodies with the Public Sector Duty. The Public Sector Duty provides a mechanism for a full review of the human rights and equality impact of the current framework of housing and homeless supports for Traveller households. We would also welcome a rights-based approach to the assessment and allocation of housing and housing supports for Traveller households.

Finally, we very much welcome the Committee's invitation to make a written submission and your engagement with the issue of accommodation for the Traveller Community. We are available to assist the Committee further in any way we can.

¹² "Implementing a choice-based lettings system for social housing tenants," Tim Brown, Alan Dearling, Ros Hunt, Jo Richardson and Nicola Yates; <https://www.jrf.org.uk/report/implementing-choice-based-lettings-system-social-housing-tenants>