

Housing for All Updated Action Plan Stakeholder Engagement

Fields marked with * are mandatory.



**An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta**
Department of Housing,
Local Government and Heritage

Housing for All Updated Action Plan Stakeholder Engagement

Housing for All (2021) is the Government's housing plan. There is a commitment in the plan that the actions will be updated on an annual basis. This ensures that the Government can respond to emerging issues and remain focused on further accelerating and increasing the delivery of homes, and addressing the challenges in the housing market including homelessness.

Two updated Action Plans have been published to date (November 2022, November 2023). The third updated Action Plan is currently being prepared and will take into account a number of recent and related developments, including:

1. the publication of the draft first revision of the National Planning Framework;
2. the forthcoming revised annual housing targets informed by the updated ESRI research on population and housing demand projections; and
3. the Report of the Housing Commission.

The Department of Housing, Local Government and Heritage is now seeking submissions to help inform the third iteration of the **Housing for All** Action Plan. We kindly ask that you, on behalf of your organisation, complete and return this form by clicking submit, by 5pm, 25th July 2024.

Please note, there is a 3,500 (circa 500 word) character limit for each answer.

Section 1: Organisation Information

* Organisation name

100 character(s) maximum

Pavee Point Traveller and Roma Centre

* Organisation Contact Name

100 character(s) maximum

Rebecca Gorman

* Organisation e-mail address

100 character(s) maximum

rebecca.gorman@pavee.ie

Section 2: Key question for consideration

Please outline briefly three actions that your organisation considers would be most impactful in addressing the challenges in the housing sector and, which would support an increase in the pace and scale of housing delivery. For each suggested action, please select from the list below, the theme to which it primarily relates.

Suggested Action 1 Select Theme

Maximum 1 selection(s)

- Scaling Up Supply
- Social and Affordable Housing Delivery
- Financing / Investment
- Cost of Construction
- Infrastructure
- Rental Market
- MMC / Innovation
- Planning & Land Management
- Construction Sector Capacity
- Homelessness
- Other

Suggested Action 1

Travellers are significantly marginalised in terms of access to adequate, safe and culturally appropriate accommodation and related supports and experience high levels of discrimination in access. Two in five Travellers (39%) continue to meet the European definition of homelessness (ETHOS), including the large number of Travellers who are experiencing 'hidden homelessness' in overcrowded living conditions. Also of concern is the use of the Housing (Miscellaneous Provisions) Act 2002 to evict Travellers living on unauthorised sites or on the roadside while waiting to be accommodated by a Local Authority. These issues have been consistently highlighted by UN treaty- monitoring bodies, European institutions and human rights bodies. While "Housing for All" recognises that Travellers and Roma are overrepresented in the homeless population, there are no specific actions the Plan commits to to address the issue.

Nine in ten Roma in Ireland report experiencing discrimination when accessing accommodation. Many Roma live in poor quality accommodation and live in severely overcrowded conditions and in unsafe abandoned buildings. Almost half of Roma in Ireland have experienced homelessness in their lives, and due to the restrictive criteria of accessing emergency housing and homelessness services, many resort to staying in overcrowded conditions and living in abandoned buildings or warehouses. Of significant concern is the proposed amendments relating to homelessness in the Housing Act 1988, which seeks to introduce further restrictions via eligibility criteria to access emergency accommodation. The habitual residency condition as an eligibility requirement, a condition not present in Irish legislation, already causes a disproportionate discriminatory impact on marginalised groups in Ireland. The introduction of these eligibility requirements will undermine the State's efforts to meet its international human rights obligations which it has committed to in the National Traveller and Roma Inclusion Strategy.

The following actions are required:

-Ensure full implementation of Housing for All, specifically:

In line with Actions 3.11, 3.12 and 3.13 on the health of people who are homeless, include specific measures to support inclusion of Travellers who are homeless in partnership with Traveller organisations.

In line with Action 3.8 ensure that guidance is issued to Local Authorities on their Homeless Action Plans prepared under section 37 of the Housing (Misc. Provisions) Act 2009, includes specific guidance on the needs of Travellers who are homeless in partnership with Traveller organisations.

- Based on the State's legal obligations under the Public Sector Duty and International Human Rights commitments, reconsider requiring habitual residency as a condition for access to section 10 funded emergency accommodation.

-Include clear actions on addressing Traveller homelessness in Traveller specific policy, such as Traveller Accommodation Plans.

-Continue the moratorium on Traveller evictions (that was in place throughout COVID-19) and the decommissioning of Traveller-specific accommodation until the accommodation needs of all Travellers on Local Authority Housing Lists are met. The State should also ensure adequate safeguards against eviction and access to timely recourse for Travellers victims of forced evictions.

-Appoint a National Accommodation Lead (at Senior Level) for Travellers given the disproportionate rates of homelessness.

Suggested Action 2 Select Theme

Maximum 1 selection(s)

- Scaling Up Supply
- Social and Affordable Housing Delivery
- Financing / Investment
- Cost of Construction
- Infrastructure
- Rental Market
- MMC / Innovation

- Planning & Land Management
- Construction Sector Capacity
- Homelessness
- Other

Suggested Action 2

3500 character(s) maximum

The European Committee of Social Rights noted in its concluding observations in 2024 that there is no documented evidence of “tangible and meaningful improvements as regards the provision of accommodation for Travellers or living conditions on halting sites” driven by the State.

We have seen the positive actions that can take place when the political will is driving progress, as seen in the dramatic change of approach to provide appropriate public health measures for Traveller accommodation throughout the COVID-19 pandemic. A national circular was published for local authority Directors of Housing to provide water, toilets, refurbishment, site works, and additional mobile accommodation where required. This made a significant difference at this time, as was the first time where the full budgets for local authorities for Traveller accommodation were fully drawn down. It should not take a pandemic to make sure such basic living conditions are provided by the State. Since then, it appears that the processes for Traveller accommodation have regressed in some areas.

We are extremely concerned about the current approach to data collection, specifically the implementation of a ‘Traveller identifier;’ in the social housing needs assessment form. This question explicitly targets Travellers and is contrary to human rights standards which requires that a universal question and that the collected data is aggregated and anonymised to avoid identification of specific individuals. We also note the omission of Travellers and Roma in the Housing for All published Statistics which is due to the lack of disaggregated data. The voluntary sector and approved housing bodies have also failed to provide Traveller accommodation, and allocation mechanisms may also disadvantage Travellers who may apply.

There are many Roma living in precarious and vulnerable situations; 12.4% do not have a kitchen. 10% do not have a cooker, and 14% do not own a fridge. Many do not raise concerns due to fear of eviction by their landlord. A very low number of Roma live in social housing, likely due to the barriers in accessing these supports, many being unable to meet the conditions of the Departmental Circular 41/2012 and therefore cannot access vital housing supports such as the Housing Assistance Payment.

The following actions need to be taken:

- Ensure adequate funding allocated to Local Authorities to meet targets in Local Traveller Accommodation Plans and put in place monitoring mechanisms for implementation. This must involve the development of new Traveller-specific accommodation in line with existing and projected needs.
- Prioritise the Traveller specific measures in the Housing for All Strategy that and ensure that the needs of Travellers are met through clear targets, actions, and resources.
- Implementation of a universal ethnic identifier (in line with the census) across all Local Authority and homeless datasets in line with a human rights based approach.
- Provide support to Roma in accessing housing support and explore other avenues to demonstrate eligibility rights and entitlements.
- Provide a equality impact assessment on the outcomes of the Departmental Circular 41/2012 on marginalised groups, such as Roma.

Suggested Action 3 Select Theme

Maximum 1 selection(s)

- Scaling Up Supply
- Social and Affordable Housing Delivery

- Financing / Investment
- Cost of Construction
- Infrastructure
- Rental Market
- MMC / Innovation
- Planning & Land Management
- Construction Sector Capacity
- Homelessness
- Other

Suggested Action 3

3500 character(s) maximum

Roma in Ireland report living in poor quality accommodation with insecurity of tenure and a lack of access to social housing and rent supplement. The vast majority of Roma live in privately rented accommodation, the majority of which rent from a private landlord. Environmental health issues are a significant concern in accommodation, with rat infestations being common, with fear of eviction and homelessness preventing both Roma families and service providers from reporting these issues.

The continuous declining provision in Traveller-specific accommodation by the State has increased Travellers in relying on the rental sector for accommodation. Discrimination and racism from private landlords makes access to this market extraordinarily difficult for Travellers to access and is a major driver of Traveller homelessness.

The actions required include:

- Undertake an equality impact assessment on the disproportionate provision of HAP on Traveller families in accessing accommodation.
- The housing monitoring bodies produce disaggregated data and a universal ethnic identifier (in line with human rights standards) in all housing datasets, from homelessness to those availing of social housing supplements and evictions.
- Accelerate implementation of the Traveller specific actions outlined in the Housing for All Plan.

Contact

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