

## **Summary of Responses to Public Consultation on the draft Irish Traveller Accommodation Strategy 2020-25**

We would like to take this opportunity to thank all nine respondents to our Irish Traveller Accommodation Strategy consultation for their considered and constructive feedback;

- Mid Ulster District Council
- Housing Rights
- Sinn Fein
- Northern Ireland Council for Racial Equality (NICRE)
- Craigavon Travellers Support Committee
- Andy Frew Architect
- CENA, Culturally Appropriate Homes
- Northern Ireland Human Rights Commission
- Commissioner for Older People for Northern Ireland

A summary of comments along with response is set out in the table below. Some comments/ suggestions received were not within the scope of this strategy or were general operational issues. These have either been noted or forwarded to the relevant Housing Executive department for action.

<b>Theme</b>	<b>Summary of Comments</b>	<b>Housing Executive response</b>
Reception/Engagement	<ul style="list-style-type: none"> <li>• Most respondents have sought to engage with the strategy, provide their support and expertise in relevant areas.</li> </ul>	<ul style="list-style-type: none"> <li>• We are grateful to all respondents for their feedback and comments. We will seek to engage with all throughout the lifetime of the Strategy, to avail of their knowledge and expertise to enhance our work.</li> </ul>
Language and Structure	<ul style="list-style-type: none"> <li>• It was highlighted that when referring to those in Northern Ireland that identify as traditionally nomadic and a Traveller in the general sense, that the term 'Traveller communities' (in the plural) is used; or when</li> </ul>	<ul style="list-style-type: none"> <li>• We recognise that some of the language in the draft Strategy to be erroneous. We appreciate this feedback and have reviewed the Strategy to ensure the correct terminology is used.</li> </ul>

	<p>referring to a specific group of Travellers, such as the 'Irish Traveller community', that this is expressly stated.</p> <ul style="list-style-type: none"> <li>The language used in the implementation plan for Action 11 was questioned. It was felt that words such as embraced and welcomed were not appropriate. It is argued that Travellers do not seek to be 'embraced' nor should they have to be 'welcomed' in order to live there.</li> </ul>	<ul style="list-style-type: none"> <li>Whilst the point made is understood from an Irish Travellers perspective, the Housing Executive considers that local communities should embrace and welcome all irrespective of background.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>On page 16 of the Strategy, the obligations attached to forced evictions are deemed to be inaccurate. It has been recommended that this section is amended throughout to refer to the right to adequate housing, as opposed to the right to housing, with the former more accurately reflecting human rights standards.</li> </ul>	<ul style="list-style-type: none"> <li>This response is noted and the Strategy was reviewed to take account of this response.</li> </ul>
Engagement with other Housing Executive strategies / internal departments	<ul style="list-style-type: none"> <li>Clarity was sought on how we will engage with other organisational strategies.</li> </ul>	<ul style="list-style-type: none"> <li>The Strategy is a cross divisional Strategy within the context of the Housing Executive. The implementation plan will be delivered on a cross divisional basis with involvement from staff across Housing Services / Regional Services and Asset Management. It will be fully inclusive to encourage broad support and engagement. In addition, as part of the Strategy Action Plan, it is intended that all NIHE policies/procedures will be subject to equality screening and will ensure due regard is paid to Irish Traveller needs, priorities and other relevant Issues.</li> </ul>
Gender	<ul style="list-style-type: none"> <li>It was recommended that the specific needs of Traveller women be referenced in the Strategy.</li> </ul>	<ul style="list-style-type: none"> <li>The Housing Executive will include this matter for consideration as part of future research of Irish Travellers.</li> </ul>

Children	<ul style="list-style-type: none"> <li>When consideration is given to children, the document should take into account different age ranges and stages of development.</li> </ul>	<ul style="list-style-type: none"> <li>The Housing Executive will include this matter for consideration as part of future research of Irish Travellers.</li> </ul>
Research findings	<ul style="list-style-type: none"> <li>Caution was urged against assumptions which (even by accident) contribute to a further decline of forms of accommodation which are culturally preferential. Further exploration is required to ascertain whether acceptance of bricks and mortar accommodation is an expression of a positive choice or instead, is an acceptance of the best of a very narrow set of options which does not include culturally appropriate provision.</li> </ul>	<ul style="list-style-type: none"> <li>The Housing Executive will continue to use the best available data along with local knowledge and Irish Traveller input to inform our decision making. The Irish Traveller Accommodation Survey (Northern Ireland) 2018/19 is a comprehensive piece of work where households surveyed were specifically asked about their preferred accommodation type. Over 75% of 540 respondents identified bricks and mortar as their preferred form of Social Housing or Grouped Housing.</li> </ul>
Propensity to Travel	<ul style="list-style-type: none"> <li>It was suggested that a significant number of Travellers would like to travel more if they had the opportunity. Based on the Final Report of the Promoting Social Inclusion (PSI) working group on Travellers in 2001: <i>at present, a substantial majority (82%) stated that they do not travel much. However, when asked whether they would like to travel more if they had the opportunity, just under two thirds (62%) said that they would.</i> Based on the most recent Housing Executive Irish Traveller Accommodation Survey 2018/19, '7% of respondents expected that they or a member of their household would travel within the next three years'. It has been suggested that the survey lacks any meaningful investigation as to why this research 'points to a general decline in nomadism'.</li> </ul>	<ul style="list-style-type: none"> <li>The Irish Travellers Accommodation Survey 2018/19 contains the most up-to-date data and evidence in respect of these issues. This survey asked if respondents do not wish to travel, what are their reasons? Of the 461 households who responded to this question, 83.5% did not wish to have a nomadic lifestyle; 8.2% cited health reasons; 0.9% Financial reasons; 1.7% poor quality of Transit sites; 1.5% lack of Transit sites; 0.2% lack of emergency halting sites; 3.5% other and 0.4 not sure.</li> </ul> <p>Nevertheless the Housing Executive agrees that research should seek to include supplementary questions to fully explain responses and that the research is strengthened by trend analysis rather than a snap-shot in time investigation.</p> <p>Therefore the Housing Executive will carry out a review of the need for Transit site provision as part of the five</p>

		year implementation plan including full consultation with all relevant parties.
Culture	<ul style="list-style-type: none"> <li>In general, it was mentioned that any future Irish Travellers Strategy must respect nomadism as an integral part of Traveller culture and should provide them with the transient halting sites that are serviced and properly supported.</li> <li>There is concern that the Housing Executive is forming an argument against Transit sites without evidence.</li> </ul>	<ul style="list-style-type: none"> <li>The vision of the Irish Travellers Accommodation Strategy is: <i>to provide safe and sustainable accommodation that meets the housing and cultural needs of the Irish Traveller community</i>. Through the implementation of the key actions, the Housing Executive will monitor and review the need for serviced sites and transit sites and seek to identify appropriate solutions.</li> <li>Action 4 of the Strategy is 'To undertake a review of transit sites to establish, through a generated needs assessment, the existing and future demand for transit sites in Northern Ireland within the Irish Traveller community'. All available evidence will be considered as part of this review.</li> </ul>
Details	<ul style="list-style-type: none"> <li>One respondent repeatedly asked for greater detail and clarity throughout the Strategy.</li> </ul>	<ul style="list-style-type: none"> <li>The Housing Executive believes that the Irish Travellers Accommodation Strategy 2021-26 outlines the organisation's commitment to this issue setting out the strategic direction. The implementation plan sets out measurable actions along with timescales for delivery.</li> </ul>
Participation	<ul style="list-style-type: none"> <li>It was noted that the Housing Executive details some of the barriers to Travellers participation, yet provides no potential solutions.</li> </ul>	<ul style="list-style-type: none"> <li>Throughout the Strategy, the Housing Executive has identified areas where we believe we can improve Traveller participation such as early engagement, partnership working and building relations. The Housing Executive will continue to work with all relevant stakeholders to improve Irish Travellers participation as part of this Strategy.</li> </ul>

Unauthorised Encampments	<ul style="list-style-type: none"> <li>The correlation between the reduction in unauthorised encampments and social media in the paragraph “The numbers of unauthorised encampments operating in Northern Ireland have drastically reduced over the years as the propensity to travel has diminished and the use of technologies such as Facebook, Skype and Instagram, which allow families to remain in touch without the need to travel, have increased.” Has been questioned.</li> </ul>	<ul style="list-style-type: none"> <li>This analysis was made from anecdotal information received through the Irish Traveller Accommodation Survey. The statement has since been removed from the Strategy/Implementation Plan as it lacks substantive evidence to corroborate the claim.</li> </ul>
Compatibility	<ul style="list-style-type: none"> <li>There was some opposition to the suggestion of including a Compatibility programme that enables respect between Irish Travellers in the implementation plan. It was considered a “racist and dangerous statement, has no place in the Strategy and would be unacceptable if used in the context of any other community or section of society.”</li> </ul>	<ul style="list-style-type: none"> <li>Following further discussion with specialist NIHE staff, it was agreed to remove the term ‘compatibility’ from the Strategy as it has no legal or policy status. Instead the Irish Traveller Strategy will focus on building and encouraging good relations between Irish Travellers and between the Irish Travellers and local communities.</li> </ul>
Traveller Support Groups	<ul style="list-style-type: none"> <li>It was highlighted that on pages 48 and 49, there are five Traveller Support Groups listed. This information is incorrect and should be updated. Bryson Intercultural and STEP are not Traveller Support Groups. The details in relation to CTSC are incorrect.</li> </ul>	<ul style="list-style-type: none"> <li>This response is noted and the strategy will be reviewed to take account of this response.</li> </ul>
Error	<ul style="list-style-type: none"> <li>PHA Regional Traveller Health and Well-being Forum is wrongly titled in the Strategy (page 23).</li> </ul>	<ul style="list-style-type: none"> <li>This response is noted and the strategy will be reviewed to take account of this response.</li> </ul>
Implementation plan	<ul style="list-style-type: none"> <li>For Action 9 in the implementation plan, the Housing Executive have outlined the following: <i>‘What we will do - Look at ways to promote our range of housing services for Irish Travellers.</i> <i>Measure - Traveller evaluation of our housing service provision’</i></li> </ul>	<ul style="list-style-type: none"> <li>The Housing Executive notes the response. The Housing Executive does not believe the suggested approach would be effective and the implementation of the action as written in the draft Strategy will remain at this time. It should be noted that the Housing Executive by ‘Looking at ways to promote our range of housing</li> </ul>

	<p>It has been suggested the action should be a Traveller evaluation of housing service provision and the measure would be to address the findings of such a survey.</p> <ul style="list-style-type: none"> <li>• For action 10, <i>the Housing Executive plans to ensure Irish Travellers engaged with the Housing Executive are provided with a professional / culturally sensitive service. The means of measuring success is the number of housing professionals completed training.</i> It has been suggested that this measurement will not ensure better service delivery.</li> <li>• For action 11, <i>we plan to Support Irish Travellers who wish to live within settled communities.</i> The question was asked as to whether this would be extended to Travellers who lived on sites.</li> </ul>	<p><i>services for Irish Travellers'</i> will involve full consultation with Irish Travellers.</p> <ul style="list-style-type: none"> <li>• If the appropriate training is delivered, the Housing Executive believe that ensuring as many staff as possible receive the training will benefit service delivery to Irish Travellers. The Housing Executive believes that the review of Irish Traveller cultural awareness training for further roll-out will ensure training is appropriate and targeted.</li> <li>• The Housing Executive seeks to support all Irish Travellers in their chosen form of living accommodation by meeting accommodation needs, adequate housing/site provision, culturally aware housing services and in encouraging good relations.</li> </ul>
Thanks	<ul style="list-style-type: none"> <li>• It was highlighted that the Strategy did not specifically thank the Irish Travellers who contributed either directly or indirectly to its content.</li> </ul>	<ul style="list-style-type: none"> <li>• This response is noted and the Strategy was reviewed to take account of this response.</li> </ul>