

'CULTURALLY APPROPRIATE AFFORDABLE ACCOMMODATION FOR TRAVELLERS' SEMINAR REPORT, TUESDAY 12TH JUNE 2018

This seminar was hosted to develop and advance the recommendations
arising from a study into the cost of mobile home and trailer
accommodation for Travellers

National Traveller
MABS

Introduction

National Traveller MABS is a leading advocate for the financial inclusion of Travellers in Ireland. Part of our work involves advocating for culturally appropriate affordable accommodation for the Traveller Community. To date we have supported a number of schemes that provided access to finance for the purchase of mobile homes/trailers and have worked to explore ways of ensuring Travellers have access to culturally appropriate affordable accommodation.

In February 2018, we undertook a small study into the retail cost of mobile home/trailers. The study concluded that the current situation whereby Travellers must finance their own mobiles has implications in terms of over indebtedness and fuel poverty. It also concluded that most Travellers cannot afford to purchase mobile homes or trailers that are of residential standard. The current situation is one where social housing tenants effectively must access credit to purchase sub-standard accommodation. The study recommended the development of a national mobile home/trailer rental scheme and the development of Irish standards in relation to trailers and mobile home accommodation, to ensure Travellers can access affordable good quality culturally appropriate accommodation.

After the study was concluded National Traveller MABS met with a number of local Traveller organisations and with the Irish Traveller Movement to promote the study findings, and to explore how this work could add to the existing work in the area of culturally affordable accommodation for Travellers. In June 2018, we organised a seminar to disseminate the findings of this study.

The aim of this seminar was to feedback the findings of our study to representatives of the Traveller community with a view to working with both national and local Traveller organisations to further develop and progress the recommendations as part of the overall work of Traveller organisations to realise rights of the Traveller community to culturally appropriate affordable accommodation.

The Irish Traveller Movement supported the seminar in terms of contribution of their expertise, promotion of the seminar to their members and participation through presentation and workshop facilitation at the event. A representative from the National Traveller Women's also facilitated a workshop at the event.

Seminar Proceedings

Introduction to the Seminar

Nancy Power, Joint Coordinator of National Traveller MABS introduced the seminar and welcomed participants. She outlined the background to seminar, the work of National Traveller MABS to date in the area of culturally appropriate affordable accommodation. She thanked the Irish Traveller Movement who supported the delivery of this seminar. She provided those present with a short history of the work of National Traveller MABS in the area of supporting access to credit for the purchase of mobile home /trailer accommodation. She spoke of the three caravan loan guarantee schemes which were supported by National Traveller MABS and which were successful in terms of providing access to credit for Travellers and also in highlighting the low default rate of Travellers who had borrowed through these schemes. She made reference to the report on the review of these schemes which is available on the National Traveller MABS website. Nancy highlighted how these schemes were developed in response to the crisis in accommodation for families. She stressed how housing is a human right and that it should be affordable.

Nancy told those present that the aim of this seminar was for National Traveller MABS to give feedback on its most report in relation to the cost of mobile homes and trailers. She said the seminar provided an opportunity for Traveller organisations and groups to begin looking at alternative ways for Travellers to access culturally appropriate affordable accommodation. She invited people to contribute to the workshop discussion and her hopes that the contributions today will further inform work in the area of culturally appropriate affordable accommodation for Travellers.



Nancy Power, Coordinator of National Traveller MABS Chairs the Seminar

Presentations

Presentation by Michelle Kearns, NTMABS, 'Report on the study into the cost of mobile homes and trailers'

Michelle Kearns, National Development Worker for National Traveller MABS gave a presentation on the findings, conclusions and recommendations of the recent study undertaken by National Traveller MABS into the cost of mobile homes/trailers.

Michelle outlined the report findings:

The key findings of the report were that the cost of mobile homes and trailers depended on age condition and specification and whether or not they were manufactured to a 'residential standard' in the first instance. There were a variety of new and used mobiles homes on sale ranging from under €10,000 to over €100,000. The majority of stock included in the study was priced at over €10,000. This is of particular interest in that the current National Scheme of Loans and Grants for the purchase of Caravans for Travellers gives loans of between €6,350 and €12,000.

Prices for new non-residential standard (holiday homes) started at €30,000 while new residential standard mobile homes started at €60,000.

Mobiles on sale at the lower end of the market were in poorer condition generally. For stock priced at less than €10,000, 79% lacked either double glazing or central heating and were between 10 and 15 years old. For stock between €10,000 and €15,000 30% had either no double glazing or central heating and were between 12 and 15 years old.

Michelle presented two case studies which highlighted the difference in accommodation costs for families renting under a differential rent scheme and for families buying a caravan and renting a bay on a halting site.

In the case of the first family which comprised of two adults and four children living on social welfare, the accommodation costs for a family buying a caravan for €20,000 over 5 years were 26% of their income as opposed to 12% under a differential rent scheme. In addition given the fuel inefficiency of older mobiles there is evidence to suggest that families would also have increased fuel costs.

In the second case study of a family of two adults and four children borrowing €20,000 over 5 years their accommodation costs while buying a caravan and having to rent a bay on a halting site would amount to 29.57% of their income as opposed to €12% under the differential rent scheme.

Michelle presented information on the cost of borrowings for mobile homes

Cost of Purchasing Mobiles

Non-Residential Standard	Loan Amount	Loan Duration	Interest Rate	Monthly Repayment	Cost of Credit	Used stock
	10000.00	5	2%	175.28	516.66	
	15000.00	5	2%	262.92	774.98	
	20000.00	5	2%	350.56	1033.31	
	25000.00	5	2%	438.19	1291.64	
	30000.00	5	2%	525.83	1549.97	
	35000.00	5	2%	613.47	1808.30	
	40000.00	5	2%	701.11	2066.62	
	45000.00	10	2%	414.06	4086.27	
	50000.00	10	2%	460.07	5208.07	
	55000.00	10	2%	506.07	5727.88	
	60000.00	10	2%	522.08	6249.69	
	65000.00	10	2%	598.09	6770.49	
	70000.00	10	2%	644.09	7291.3	
	75000.00	10	2%	690.10	7812.11	
	80000.00	10	2%	736.11	8332.92	

Conclusions

Mobile homes that were not originally built to a residential standard are more likely to deteriorate quickly when being used as a permanent residence and be fuel inefficient. In addition, the setup of mobile homes/trailers in terms of preparation of the site and connection to services has implications in terms of health and safety, accessibility and quality of accommodation. Under the current system the responsibility for purchase delivery set up and maintenance lies with the individual Traveller family.

In order to improve the quality of accommodation there needs to be a standardised approach in the provision of mobile homes. This approach should ensure that mobiles are of residential standard and the responsibility for the setup of mobile homes should be organised by the local authority.

She also concluded that the purchasing power of the current Caravan Loan Scheme is not sufficient to purchase mobile homes that could be expected to meet the accommodation needs of a family all year around, the loan amount would need to be increased.

Increasing the loan amount for families would cause difficulties

- **Loan Affordability:** The loan amount needed to buy a residential standard of mobile home is not affordable for Travellers living on Social Welfare or living on low income.
- Reducing access to credit for other borrowing- increasing the loan amount would require the loan to be repaid over a longer duration which would reduce capacity to borrow for everyday events.

Recommendations

- That Department of Housing, Planning and Local Government look to develop guidelines as to what is considered to be of residential standard and that these guidelines take heed of manufacturers specification in this regard. This should be informed by a desire to ensure people have access to good quality accommodation and to eliminate fuel poverty.
- That the DHPCLG introduces a National Caravan Rental Scheme available to people who are in need of social housing.
- Recognising that some people will still want to buy, that the loan amount for an updated Caravan Loan Scheme be increased to between €15,000 and €40,000.
- That for those undertaking a loan, affordability is factored into the process of loan approval and that this process is supported by MABS services in terms of budgeting and that access to household budget for loan repayments is made available –for those unsuccessful loan applicants, they should qualify for the rental scheme.



Presentation by Bridgie Casey, ITM, 'Caravan Loan Scheme, Another Failed State Policy'

Bridgie Casey, Accommodation Worker, Irish Traveller Movement made a presentation entitled '*Caravan Loan Scheme, Another failed state policy*'. Bridgie is an activist in the area of Traveller housing rights and her presentation outlined the results of ITM's consultations with the Traveller community about their experience of the existing caravan loan scheme.

Bridgie posed the question what has been the experience of Travellers with regard to the National Caravan Loan Scheme, does the scheme have a future?

Feedback from Consultations

Feedback from the ITM consultations highlighted the discretionary nature of the existing caravan loan scheme in that while it was seen to be 'national' it was only in operation in a small number of counties. Travellers felt that it should be available to all Travellers in all counties.

The consultations found that families that were in greatest need, those living at the side of the road were not able to access the scheme. The amount on offer was not sufficient to buy suitable accommodation and the way the scheme operated meant that there was no choice as families had to go to council approved retailers where in most cases there was poor value for money. It was felt that retailers upped the price when they were aware that families had a loan to purchase rather than paying cash from their own resources.

Bridgie said the consultations highlighted that the scheme was not sustainable in the long term as there was no mechanism to support maintenance and the duration of the loans meant that often people were repaying the loan long after the caravan was derelict. Families were also exposed to risk because there was no facility for insurance.

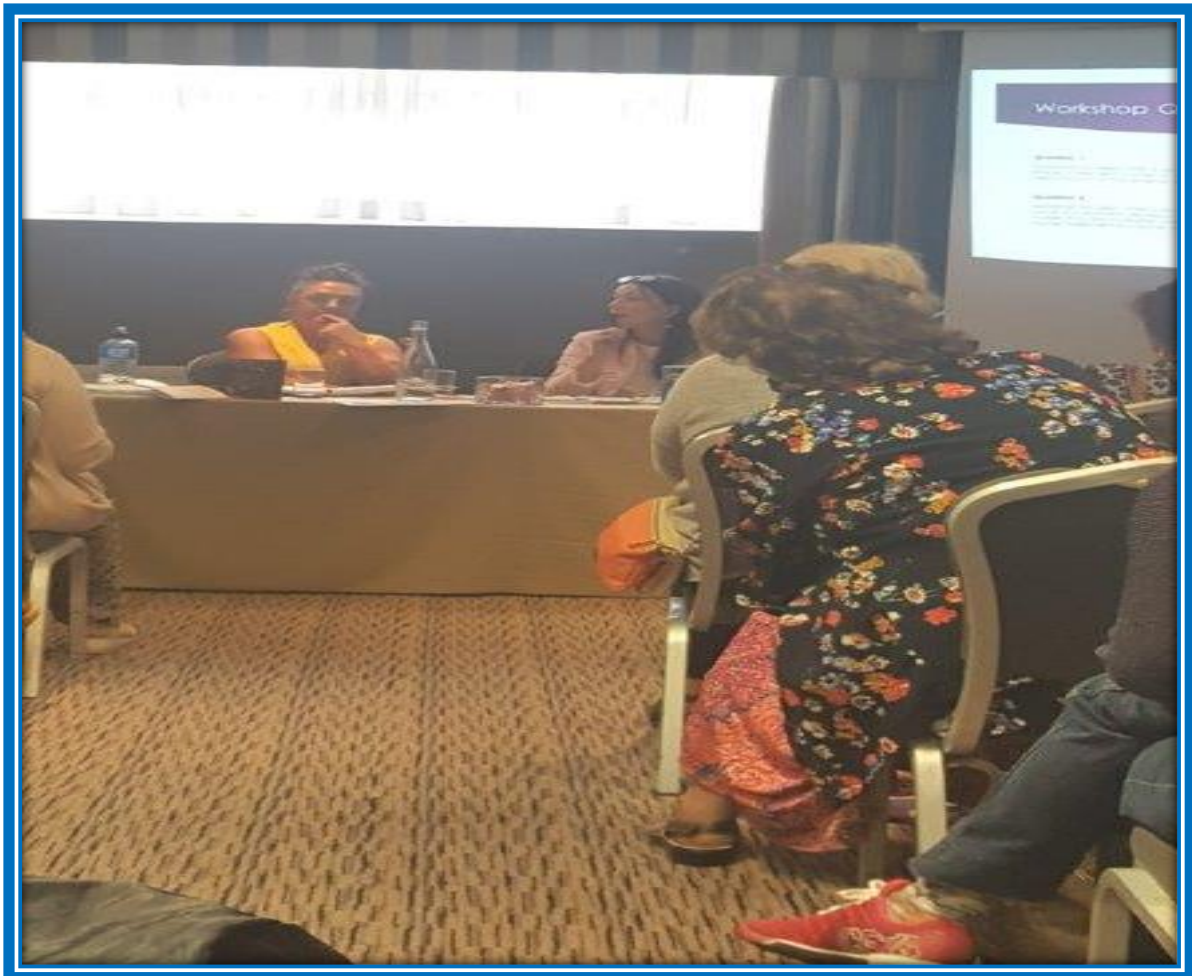
The suitability of caravans was also an issue in that often the caravan was too small for the size of the family.

Future schemes

Bridgie concluded that the loan scheme was not sufficient in its present form. A future scheme would need to have:

Choice for individual families over which type of caravan or trailer, as well as over where it may need to be moved to. It would also need to have a realistic grant amount (minimum of €30,000). The loan durations would need to be extended and there would be a benefit to the local authority buying the

unit and renting out to tenant. Bridgie iterated that there should be proper mobile homes and not small trailers and that all local authorities should have a compulsory buy-in. A truly national scheme is needed, and clear guidelines issued to all. There should be national targets and outcomes should be monitored and chalets or mobile homes should be provided as a matter of course as part of any new group housing build. The development and enforcement of guidelines for good practice and adequate standards for local authorities should form part of any new scheme.



Bridgie Casey of the Irish Traveller Movement takes questions on consultation work undertaken by the organisation on the existing 'Caravan Loan Scheme'

Presentation on 'The Caravan Loan Scheme, Traveller Accommodation and the Law'

Siobhan O'Donoghue, solicitor at Community Law and Mediation. Community law and mediation have been involved in providing legal advice to Traveller families on accommodation issues and have on a number of instances taken cases on behalf of families due to their wider significance.

Siobhan's presentation was entitled 'Caravan Loan Scheme Traveller Accommodation and the Law'. She began by saying that the law in terms of Traveller accommodation is very much in the order of 'shall' and 'may' as opposed to 'must' which is not a very positive note to start on. Siobhan then went on to explain chronologically the development of the law as it relates to Traveller accommodation and how pursuing the objective of good quality affordable accommodation was better approached on many fronts including policy arenas as well as the law.

Siobhan explained the absence of a right to housing in the constitution, and that housing rights in Irish law are framed in the context of the right to access social housing support. Siobhan went on to outline the responsibilities of local authorities, the definition of Traveller Accommodation and what constitutes Traveller specific accommodation the obligation of the state through local authorities to provide traveller specific accommodation which entails development of Traveller accommodation plans in each local authority area. She also explained the local and national consultative forums that arise out of this act.

Siobhan went on to describe the law in this area which states local authorities 'may' provide loans for caravans while it's the minister's role to specify the terms of these loans. This is what has enabled many local authorities to stop offering caravan loans.

Siobhan gave a chronology of the development of the law, including case law in the area and described in details the government circulars governing the 'Caravan Loan Scheme'

She concluded that while using the law as an avenue to progress housing rights for Travellers it's often a very slow process and that pursuing policy objectives in the area might be a more expedient route to take.

Workshop Analysis

There were four workshop groups and each was asked to respond to two questions:

Question 1

National Traveller MABS is recommending that Government develop a National mobile home/trailer rental scheme – Please state whether you think this is good or bad idea? If you are in favour of this scheme what elements do you think need to be included?

Below is the analysis of feedback from all four workshops in response to question 1:

Caravan Rental

Endorsement of Rental Scheme Idea	Defining Traveller Accommodation	Meeting family need	Qualification for scheme	Rental –what it covers	Maintenance
<p>3 workshops endorsed the rental idea</p> <p>1 made the point that the issue was broader than the mobile itself and was to do with the living conditions on site and that it is better to have a fully serviced halting site</p>	<p>There needs to be a clear definition of Traveller accommodation- the legal definition of a dwelling is something that is ‘fixed’ this needs to be amended to include culturally appropriate accommodation- (issues with planning could be overcome)</p>	<p>A new scheme would need to take into account family size and family need, as with standard housing schemes</p>	<p>Everyone (Traveller) who is in need of housing should qualify for rental – including people on the side of the road and people living in their parents’ back yard</p>	<p>The rent charged should be on the basis of a differential rent scheme and should cover the bay and the mobile and day unit/or residential standard mobile home</p>	<p>The local authority should provide for delivery of the mobile, installation on site, connection to utilities and maintenance of the mobile under the rental agreement</p> <p>A review of mobile should take place periodically (10 years suggested) and replaced if needed</p>
Choice of mobile	Right to buy	Standardised scheme	Differential rent	Insurance	Models of good

					Practice
People should be involved in choosing their own trailer including private suppliers	The scheme should facilitate 'a right to buy' as with standard housing	The scheme should be a National Scheme that operates in a standard way across local authorities areas	The differential rent scheme that applies to standard housing should apply in a rental scheme	Rented mobiles should be insured by the county council	It was noted that in some councils in the UK (Oxford was named) successfully provide good quality culturally appropriate accommodation on a rental basis

Question 2

National Traveller MABS is recommending that the Department of Housing Planning and Local Government develop standards on mobile homes and trailers, to apply to mobiles or trailers that are available under either the existing caravan loan scheme or any new mobile home/trailer rental what do you think needs to be included in these standards?

Standards

Residential Standard	Rights to good quality accommodation	The right to family life	Standard of the site on which the mobile is located	Amenities and quality of life	Post on site
There needs to be a National Residential Standard for the provision of mobile homes either for loan or for rent This should include: Manufactures specification proper heating and	Families have a right to residential standard mobile home as with settled housing provision and the standard should include appropriate fit for family size	Accommodation should provide 'privacy' for families- it should be of sufficient quality (a woman in the workshop spoke of having to buy a caravan for her 16 year old son as she had two teenage daughters and needed to provide	The site on which the mobile is located should provide for the health and safety of families living there This should include <ul style="list-style-type: none"> • Fire safety • Proper preparation of the ground on which the 	Sites should not only look at safety but take a broader view of quality of life Therefore the standards should also include: <ul style="list-style-type: none"> • Amenities • Gardens • Play areas • Church nearby 	Provision should be made to ensure families get access to their post

fire standards		privacy for dressing washing etc.	mobile is situated <ul style="list-style-type: none"> • Proper connection to utilities • Toilet facilities in the same trailer/near the trailer • Cabling should be safe • Plumbing of all necessary outlets Every family should have a specific space	The issue of high walls that segregates and makes people feel 'othered' was also discussed. This is presented by authorities as a necessity for fire safety, but is received by families as being segregated and treated as other	
Standards for Culturally appropriate Accommodation	Standards should be National				
Standards for culturally appropriate accommodation should mirror the standards for standard housing, in the following areas including: Fire safety Disability access Suitability for family size Amenities Fuel efficiency	These need to be National Standards and not piecemeal, provision by different local authorities who are allowed to opt out				

Other Issues that came up in the workshop

Budgets	Living Conditions	Accommodation and Health	The move to Standard Housing	Portable	Planning Laws
Traveller accommodation budgets should be accessed to fund Rental Schemes	<p>The living conditions on sites were discussed</p> <p>Dangerous overcrowding Inaccessibility Fire hazards Sanitary conditions Fuel poverty due to poor standards in mobiles and day units</p>	Bad design impacts on both mental and physical health	<p>People felt that the conditions were so bad on site that people had no option when offered but to take standard housing- people spoke about being forced to take a house</p> <p>Many said that if sites were of a good standard they would choose sites over standard housing</p>	One comment in one workshop stated that units should be portable	<p>Planning laws need to include recognition of what constitutes culturally appropriate accommodation. There was a case cited whereby someone who owned land wanted planning permission to put a chalet on it and was refused planning permission</p>
Action on Accommodation	Voluntary Housing Bodies	Travellers being involved in housing delivery	Caravan loan Scheme		
<p>The point was made that Traveller organisations need to engage on multiple fronts including</p> <ul style="list-style-type: none"> • Joint Oireachtas Committee on housing • NTACC • Protest at the Dail 	There was a suggestion of voluntary housing bodies being involved in the delivery of rental accommodation	There was discussion about setting up Traveller run bodies that could run sites, provide maintenance etc.	<p>There is still a necessity for a Caravan Loan scheme</p> <p>People living in their parents back yard should be able to avail of the loan scheme as should unofficial tenants on halting sites and group housing schemes</p>		

Anomalies between the treatment of Travellers and of settled people in terms of culturally appropriate accommodation

When more than one family occupies a bay both families are charged rent despite the second family not being recognised by the local authority as a tenant for the purpose of the caravan loan scheme

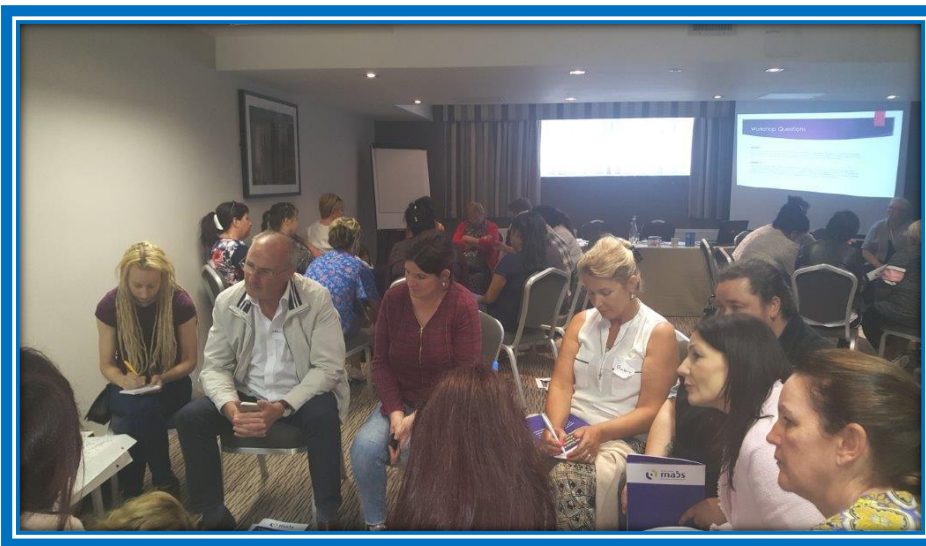
In the case of settled people the state does not expect the family to buy their home –while there is an option to purchase the family is offered rental in the first instance

In the case of Travellers, the state will not provide Traveller families with bedrooms they only provide the bay and the day unit and the onus is on the family to buy. They have no choice.

If more than one family occupies a bay then Department of Social Protection will only grant one fuel allowance because people are deemed to live at the one address

With the second family living in a bay there is always a fear of eviction

Traveller homelessness and the situation of families on un serviced sites and other living at the side of the road was also discussed



Plenary Session

The plenary session reflected much of the discussion that took place during the workshop but a number of pertinent issues were also raised that added to the workshop discussion including:

- The Traveller Accommodation Act is under review, this act provides for Caravan loans and so these discussion can be fed into this process
- The quality of life issue is of high importance and must feature in all the work arising out of these discussions
- We must work towards a programme of high quality accommodation
- The importance of securing a legal definition that of housing and dwelling that is culturally appropriate and insures the rights of Traveller to a culturally appropriate home
- The necessity to lobby for change to include a variety of spaces
- The importance that solutions are not piecemeal and that the responses are clear and consistent across departments and local authorities
- That rental schemes include formal contracts that give people rights to remove the fear of eviction
- The concept of anti-gypsyism and how this might apply in the current context as it relates to the provision of accommodation by the state in a culturally appropriate manner.
- Ensuring that any scheme going forward replenishes existing stock and provides for maintenance
- A strong argument for the right to purchase was made during the plenary and the introduction of rental should not do away with the right to purchase
- The issue of overcrowding was also spoken about during the plenary
- The importance of the scheme being a National one whereby all Traveller could have equal access regardless of which county they lived
- The issue of electricity cards being linked to bay rental payments was also highlighted with people agreeing that this practice must cease



Conclusion Learning and Next Steps

Dermot Sreenan Joint Coordinator of National Traveller MABS concluded the seminar by making the following speech summing up

‘Culturally Appropriate Affordable Accommodation for Travellers’

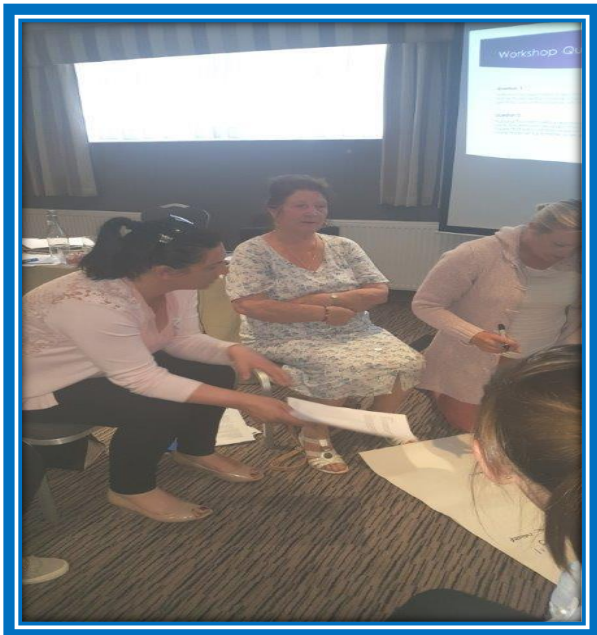
We did not expect as a national organisation to find ourselves in this space, but when you have a remit that covers fighting the financial exclusion faced by Travellers, then paying for a place to live, is always a large part of that, so here we are.

In the past we got involved in a caravan loan scheme, because there was widespread and systematic failure of the loans that had been going through the LTACC's. We stepped in to fill that gap and it worked very well for some Travellers, and brought a few families into financial inclusion, and they successfully paid back loans. This is documented as Nancy previously mentioned in our report of 2015 conducted by Dr. Stuart Stamp – when the Department at the time decided to stop the deduction from Household budget and effectively killed that scheme.

We have pushed the department to review the caravan loan schemes, and there is a possibility that the caravan loans may be re-introduced. But something significant has changed, and that is the state recognition of Travellers as an indigenous ethnic group – and what must follow that recognition is policies and resources to ensure that it has meaning and significance for Travellers. That is what today is about. The caravan loan scheme may be re-introduced, but it never was and can never take the place of policy.

What we wanted from today's event was to get the backing of local Traveller groups along with the other National Traveller organisations to really push for a policy to be developed which is about culturally appropriate homes to be made available to Travellers, firstly to rent, and for those who wish to buy the caravan loan scheme can operate for them. When someone from the general population, or settled, goes on the housing list for social housing, they do not sign up for a loan to buy that house? That would be ludicrous. Yet – that is what goes for policy in this area for Travellers. This has to end and for that to happen we all need to be pushing for the same thing, and in the same direction. So we need a unified and supported approach from the national and local Traveller groups clearly demanding policy in this area, and having caravan rental as a priority piece sitting within that.

Attendees at the seminar



Appendices

Appendix 1- Seminar Attendance

- Number of people who signed in: 48- 16 Traveller organisations represented
- Staff in Attendance from MABS 6

Organisations represented:

- Ballyfermot Traveller Action Project
- Cork Travellers Action Project
- Cork Travellers Women's Network
- Clondalkin Travellers Development Group
- Exchange House Ireland
- Irish Traveller Movement
- National Traveller Women's Forum
- North Tipperary Leader Partnership
- Offaly Traveller Movement
- Pavee Point
- Southside Travellers
- Tallaght Travellers
- Travact - Coolock
- Traveller Counselling Service
- Traveller Voice Magazine
- West Limerick Primary Healthcare Project

Others

- Liffey South West MABS
- Northside Community Law and Mediation



National Traveller Mabs

Money Advice & Budgeting Service

Seminar Tuesday 12th June 2018

'Culturally Appropriate Affordable Accommodation for Travellers'

Background

National Traveller MABS advocates for culturally appropriate affordable accommodation for the Traveller Community. We recently undertook a small study on the cost of Mobile Home/Trailers and have had a number of recommendations in relation to the development of a mobile home/trailer rental scheme and the development of Irish standards in relation to trailers and mobile homes. We are hosting a seminar for Traveller organisation interested in exploring and advancing the report recommendations, this seminar is being hosted with the support of the Irish Traveller Movement.

10.30 am	Registration (tea and coffee on arrival)
11.00 am	Opening address Nancy Power, Joint Coordinator, National Traveller MABS
11.05 am	Presentation of Study Findings, Michelle Kearns, NTMABS
11.25 am	<i>'Caravan Loan Scheme, Another Failed State Policy'</i> Bridgie Casey, National Accommodation Worker, Irish Traveller Movement
11.40 am	<i>'Caravan Loan Scheme, Traveller Accommodation and the Law'</i> - A general overview of the law relating to Traveller Accommodation and in Particular the Caravan Loan scheme in Ireland', Siobhan O'Donoghue, Community Law and Mediation Centre
11.55 am	Tea and Coffee Break
12.05 pm	Workshops
	Developing an affordable Mobile/Trailer Rental Scheme
	Developing Standards for Trailer /Mobile Home Accommodation
1.00pm	Feedback from Workshops
1.15pm	Dermot Sreenan, Joint Coordinator, National Traveller MABS, conclusions and agreed actions
1.30 pm	Lunch