



Review of the Scheme of Loans and Grants for the Purchase of Caravans by Travellers

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Government**

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Executive Summary

Background

In 2016 the Housing Agency was asked by the Department of Housing, Planning, Communities and Local Government (DHPCLG) to carry out a review of the 'Scheme of Loans and Grants for the Purchase of Caravans by Travellers'. This scheme was launched as a pilot scheme by the DHPCLG in 2000 to be operated by local authorities.

The purpose of the scheme (as set out in Circular Letter No.Tau 1/2000) was to encourage initiatives to address the needs of Traveller families living in substandard caravans or overcrowded conditions. The scheme provided for repayable loans, with a grant element for first time buyers, to assist in replacing caravans and assist Travellers to provide for their own accommodation needs and improve the quality of living conditions.

In carrying out the review of the scheme the Housing Agency carried out a questionnaire based survey of all local authorities to find out about the operation of the scheme in individual areas, gathered the views of key stakeholders, including national and local Traveller representatives and social workers through detailed written submissions. The Housing Agency also carried out interviews with National Traveller MABS, key local authorities operating schemes and national representative Traveller organisations.

All 31 local authorities participated in the survey and there were 20 written submissions received from stakeholders.

Key findings

The original aim of the scheme was to improve the quality and affordability of accommodation for Travellers. Twelve stakeholders thought that the scheme had helped with affordability and eight felt it had improved the quality of accommodation. Its effectiveness has been hampered by the lack of availability and consistency of its operation across the country.

There is a lack of consistency in the operation of the scheme nationally. Twelve local authorities (almost 40%) currently operate a scheme. Nearly all stakeholders thought the scheme was still relevant, while there were more varied views from local authorities. Urban rather than rural local authorities were more likely to say that a scheme was needed. This may be partly due to the general shortage in supply of housing being experienced nationally and more particularly in urban areas.

Typically it is young families with children that access the scheme, though in some local authorities this has changed over the past years and the scheme is being accessed by a wider demographic.

In 2016 there were 45 loans for caravans provided nationally by local authorities. Not all local authorities were able to supply information on all caravan loans provided between 2000 and 2016. However, of those able to, there were 1,121 loans provided, worth just over six and a quarter million euros during this period.

It is difficult to judge in full the level of arrears from the data received back from local authorities. At least 33% of loans have been paid back, or are in the process of being paid back. However, it was difficult for some local authorities to access the financial data. Looking at just those local authorities currently operating a scheme it is possible to see that in some local authorities as much as 100% of loans are, or have been paid back (eg. Kilkenny, Carlow, Clare) or in the case of Tipperary it is 89%, or Wicklow 88% of loans. On the other hand, in some local authorities such as South Dublin or Kildare very high levels of loans have been written off because of non-repayment.

Most local authorities (74%) that had stopped the scheme did so because of high levels of arrears. The other main reason was a lack of demand in the area.

What is clear from the research is that changes in legislation to the Household Budget Scheme have impacted positively on repayments to local authorities and arrears have become far less of an issue for local authorities since 2014. Changes to the Household Budget are one of the reasons that local authorities such as Dublin City Council or South Dublin County Council have, or are in the process of, reintroducing new schemes.

The guidelines set out in the Circular Letter No. Tau 1/2000 have been used by local authorities as the template within which schemes have operated. However, there is much variation between local authorities in operation, eligibility, size of loan available, procurement of caravan, connections to utilities and placement of caravan. This may be partly due to the scheme not being reviewed in 17 years and therefore it has developed differently in local authorities.

As part of this research the Housing Agency asked local authorities about potential of alternative schemes for Travellers to access credit. Almost 40% thought that alternative loan schemes operated by credit unions would be beneficial.

Recommendations

As part of this research the Housing Agency was asked to make recommendations to the DHPCLG for going forward.

The first recommendation is that the current scheme for loans and grants for Travellers to purchase caravans operated by local authorities be continued and that it be revised and expanded. The individual considerations for doing this are contained in Chapter Six of this report.

The second recommendation is that the DHPCLG should consider the introduction of a national procurement framework for registered suppliers of caravans.

The third recommendation is that the DHPCLG investigate how to reinstate the Lough Payment Scheme. This was the mechanism whereby deductions from welfare payments were taken at source and directed by An Post Household Budget scheme (HHB) through the Lough Payment Scheme to pay creditors. It was through this mechanism that repayments by Travellers for alternative loan schemes for caravans operated. The Social Welfare Act 2012 made changes to

the creditors that can be paid under the HHB scheme and from March 2014 deductions were stopped for any new National Traveller MABS clients using the Lough Payment Scheme.

Chapter 1

Introduction and Background

1.1 Background to the study

In February 2000, the (now) Department of Housing, Planning, Community and Local Government set out a Scheme of Loans and Grants for the Purchase of Caravans by Travellers. The purpose of this scheme was to supply funding to help address the needs of Traveller families living in substandard caravans, or in overcrowded conditions.

The scheme was drawn up in consultation with the National Traveller Accommodation Consultative Committee and set out that:

- local authorities could provide a loan up to a maximum of €6,350 to purchase a caravan
- the loan should be paid back within five years
- applicants must be in need and not able to provide from their own resources
- the caravan must be purchased from a registered supplier
- the local authority must be satisfied the caravan represents value for money and the applicant must be satisfied the caravan represents value for money and will meet the needs of their household
- caravans should be located in a bay or other site provided by the local authority, or another location acceptable to the authority
- the normal local authority house purchase interest rate applies to the loan and the applicant contributes at least 10% of the purchase price of the caravans
- a once off grant of 10% of the purchase price (up to a maximum of €640) for a first-time purchaser will be offset against the cost and in the case of joint applicants for a grant if one of the applicants has obtained the grant previously they will not be eligible for the grant.¹

In 2015, National Traveller MABS (NT MABS) carried out a mapping exercise on the implementation of the Caravan Loan Scheme by local authorities to find out which local authorities were providing loans for caravans. The results of this exercise showed just 36% of local authorities were providing loans, 7% on a 'case by case' basis and 57% of local authorities were not providing any loans.²

Following on from this research National Traveller MABS recommended that the Department of Housing, Planning, Community and Local Government (DHPCLG) review the scheme.

¹ Circular Letter No. Tau 1/2000 7th February 2000.

² National Traveller MABS (2015) *An overview of the implementation of the Caravan Loan Initiative by Local Authorities*

1.2 Aims of the study and research questions

In 2016 the Housing Agency was asked to undertake a comprehensive review of the Traveller Caravan Loan and Grant Scheme, and to submit a report to the Department with conclusions and recommendations.

The scheme took effect from 1st February, 2000 by virtue of the Housing (Traveller Accommodation) Act, 1998 (Commencement) Order, SI No. 37/2000 and this will be its first formal review.

The review aims to examine the operation of the scheme in each local authority area since its establishment, and report on whether the scheme is still a useful and relevant model in the context of current Traveller Accommodation policy and provision, and if it is viable in terms of general inflation and the increasing costs of caravans in the intervening sixteen years.

The specific questions the review aimed to cover were:

- The number and identities of local authorities that currently operate the scheme.
- The cost of the scheme in each local authority, the number of units funded, and the demographic spread of those accessing the scheme.
- The financing model used by local authorities operating the loan scheme.
- The application process used by these local authorities and the criteria underpinning the assessment of applications for finance under the scheme.
- The annual number of applications for finance under the scheme, and the proportion of overall number of applications in each local authority that are approved/rejected in each year since the scheme commenced in 2000, or for the period that the local authority operated the scheme.
- Examine and comment on how effectively the scheme is meeting its intended objectives, having regard to:
 - the level of demand for the scheme from Travellers;
 - its relevance in the context of current Traveller Accommodation policy and provision;
 - its viability in light of general inflation and the increased costs of caravans in the sixteen years since its establishment.
- The local authorities that do not operate the scheme and set out their reasons for this. Ascertain if the scheme was ever operated by these authorities and, where applicable, provide details on when local authorities commenced and suspended the scheme, recording their rationale for discontinuance.
- Set out details of any difficulties with the scheme that may be identified by relevant stakeholders, including Traveller representatives and local authorities, and gather views on how the scheme may be improved or revised.

- Identify what alternatives, if any, are offered by local authorities not operating the scheme, and ascertain if they can identify any particular challenges experienced as a direct result of the non-operation of the scheme.
- Assess awareness among local authorities of micro-credit or other schemes operated by Credit Unions. Gather the views of local authorities on the potential of such schemes and if these, or similar alternative funding models, would be considered viable options for the caravan loan and grant scheme.

1.3 Methodology

The research included the viewpoints of local authorities, Travellers and other stakeholders. These were explored through:

- A survey of all local authorities to find out where the scheme was in operation, the need for a scheme, key financials, the relevance of the scheme, reasons for stopping the scheme.
- Views of national and local Traveller representatives, and social workers working with Travellers were gathered by written submission to the Housing Agency via a semi-structured questionnaire.
- More detailed insight on the operation of the scheme, or alternatives was collected through interviews held with four local authorities and other stakeholders (including national Traveller representative organisations and National Traveller MABS).

1.4 Survey response rates

All 31 local authorities were asked to participate in the survey, and all of them have provided information.

The Housing Agency invited written comments from the following stakeholders:

- Irish Traveller Movement, National Traveller Women's Forum, Pavee Point Traveller and Roma Centre, Mincéirs Whiden.
- Local Traveller Accommodation Consultative Committees (LTACCs)
- Local Authority social workers.

Twenty stakeholders completed and returned written submissions. A list of all stakeholders can be found in section 3.1, page 87.

In-depth interviews to discuss in more detail viewpoints on caravan schemes, including current schemes, alternative schemes or new schemes to be launched were held with:

- National Traveller MABs
- Pavee Point and Roma Centre
- Chair of the NTACC
- Dublin City Council
- South Dublin County Council
- Wicklow County Council

- Fingal County Council

More detailed input was collected from the Irish Traveller Movement.

1.5 Data analysis

Quantitative and qualitative data was collected from local authorities and stakeholders. The qualitative data was analysed thematically and common themes emerging under each of the key headings in the submissions, and from the interviews, have been reported on.

Quantitative data concerned with the number of loans, sums of loans etc. has been analysed in Excel and this can be found in Chapter Two.

1.6 Ethical considerations

The review did not undertake any research with individual Travellers.

1.7 Limitations

This survey invited views on the loan scheme and its operation and collected historical data going back 16 years. In some local authorities, the staff involved in the scheme were no longer in place and so understanding completely the rationale for ending the scheme, or the difficulties operating it for example, were not always readily available. Some no longer had access to financial data going back all the years.

1.8 Background

The Irish Traveller community is an indigenous minority group with legal recognition. The Equal Status Act (2000) provides that:

*The community of people who are commonly called Travellers and who are identified (both by themselves and others) as people with a shared history, culture and traditions including, historically, a nomadic way of life on the island of Ireland.*³

Travellers account for less than 1% of the population in Ireland.⁴ Studies have shown that Travellers, as a small minority group, experience disadvantage in terms of employment, health and housing⁵, and contend with prejudice.⁶ Studies also confirm that Travellers contend with disadvantages in accessing and using financial services such as basic banking services, credit and insurance. This process of financial exclusion poses considerable difficulties and can lead to some Travellers being unable to access loans at reasonable rates to repair, renovate or replace

³ <http://www.irishstatutebook.ie/eli/2000/act/8/enacted/en/html>

⁴ See appendix E

⁵ Nolan, B. and B. Maître (2008). *A Social Portrait of Communities in Ireland*, Dublin: Department of Social and Family Affairs;

All Ireland Traveller Health Study Team (2010) *All Ireland Traveller Health Study, Our Geels. Summary of Findings*, Dublin: UCD School of Public Health and Population Science;

Watson, D., P. Lunn, E. Quinn and H. Russell (2011) *Multiple Disadvantage in Ireland: An Analysis of Census 2006*, Dublin: Equality Authority and Economic and Social Research Institute.

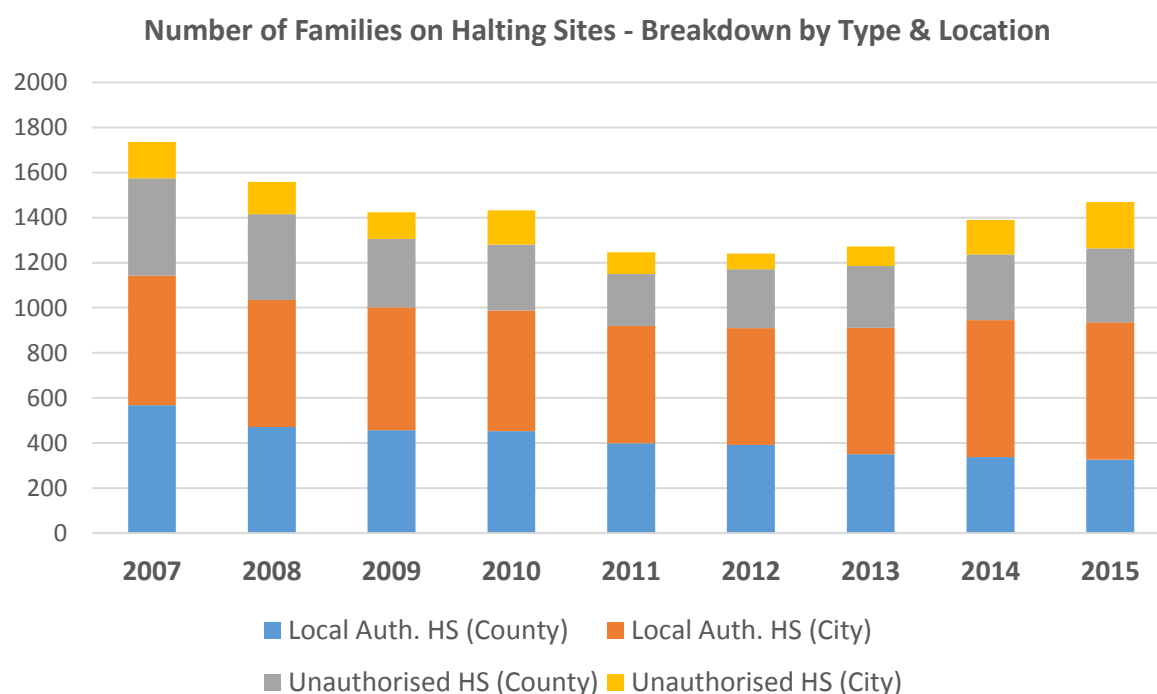
⁶ MacGréil, M. (2011) *Pluralism and Diversity in Ireland. Prejudice and Related Issues in Early 21st Century Ireland*, Dublin: Columbia Press.

a caravan.⁷ As a result, Travellers often look to non-mainstream financial services and specifically moneylenders (legal and illegal) to provide loans to improve their living situation.⁸

The 2011 Census indicated that most Travellers live in conventional housing with 12% living in a caravan or mobile home. A 2017 study by the ESRI using Census 2011 data found that Travellers living in a caravan or mobile home are more likely to live in overcrowded conditions and lack the basics such as central heating, piped water, adequate sewerage facilities, and internet access. Travellers living in mobile homes or caravans are also more likely than those in conventional housing to be married couples or formerly married adults, children and young adults; have lower levels of education; and be unemployed.⁹

Local authorities carry out an annual count of Traveller Families published by the DHPCLG. Data taken from this has been produced in Figure 1.1 and provides a picture of the number of families living in halting sites, both official and unofficial taken from the Annual Counts of Traveller families for the years 2007 to 2015. The figures have been divided into numbers living in official and unofficial halting sites and further divided by whether these are city or country local authorities.

Figure 1.1: Number of families on halting sites by type and location, 2007 to 2015



Source: Compiled by the Housing Agency from Department of Housing, Planning, Community and Local Government, Traveller Accommodation Statistics, Annual Count of Traveller Families – (<http://www.housing.gov.ie/housing/special-housing-needs/traveller-accommodation/traveller-accommodation-statistics>)

⁷ <http://www.ntmabs.org/publications/policy/2015/a-review-of-national-traveller-mabs-supported-caravan-loan-guarantee-scheme.pdf>

⁸ https://www.mabs.ie/downloads/reports_submissions/Travellers_and_Personal_Finance.pdf

⁹ Watson, Dorothy, Oona Kenny, and Frances McGinnity. "A Social Portrait of Travellers in Ireland." (2017). Review of the Caravan Loans and Grants Scheme

In the four-year period from 2007 to 2011 there was a 28 per cent decrease in the number of families living on halting sites provided by local authorities and on unauthorised sites, from 1,734 families in 2007 to 1,247 in 2011. However, since 2011 the numbers of families living on halting sites has been steadily increasing. Current figures for 2015 show a total of 1,469 families living on halting sites around the country, a rise of 18 per cent since 2011¹⁰.

The gap between the numbers of families living on local authority halting sites and those living on unauthorised sites has been narrowing since 2011, with 2015 recording the smallest differential since the first annual traveller count in 2007. In the four-year period from 2011 to 2015 there was a 63% increase in families living on unauthorised halting sites with a figure of 327 families in 2011 rising to 534 in 2015. An interesting point to note is that from 2012 City Local Authorities experienced an almost 200% increase in families living on unauthorised sites, from 69 families in 2012 to 205 in 2015.¹¹

Prior to The Traveller Health National Strategy 2002-2005, the Housing (Traveller Accommodation) Act 1998 established a five-year plan for the provision of accommodation for Travellers. The plan provided, amongst other directives, for assistance and incentives for Travellers to purchase or improve the private home of their choosing.¹² Subsequently, the *Caravan Loan Initiative* was established by the Department of Environment in 2000. The loan initiative (scheme) provided funding for local authorities to deliver caravan loans to Travellers in their area. The maximum amount set for these loans was €6,350 with each local authority responsible for the provision and repayments of the loans. Local authorities administered the scheme at their own discretion.

The purpose of the caravan scheme was to encourage initiatives to address the needs of Traveller families living in substandard caravans or in overcrowded conditions. The availability of funding to Traveller families to replace substandard caravans was intended to address these problems. The new scheme was to assist Travellers in being able to provide for their own accommodation needs and ensure an improvement in the quality of living conditions.

Some local authorities utilised what is known as the Household Budget scheme (HHB). This scheme facilitates the deduction of loan repayments at source, free of charge, from the loan recipient's social welfare payment via branches of An Post in order to spread the cost of some household bills over the year. This payment method was attractive to both the borrower and the lender as it allowed for easier budget management for the loan recipient and provided a level of assurance for the local authority regarding regular repayments. From 1st January 2014 those using the HHB could no longer stop or amend repayments to housing bodies (rent, HAP

¹⁰ DHPCLG (2015) *Annual Count of Traveller Families in 2015 in LA and LA Assisted Accommodation and on Unauthorised Halting Sites* (<http://www.housing.gov.ie/housing/special-housing-needs/traveller-accommodation/annual-count-traveller-families-2015-la-and-la>)

¹¹ City LAs: Cork, Dublin City Council, Dun Laoghaire-Rathdown, Fingal, South Dublin, Galway, Limerick.

¹² Department of Environment and Local Government (1998) *Accommodation Options for Travellers*. Stationary Office, Dublin.

contributions) without the consent of the housing body.¹³ Prior to this HHB repayments could be cancelled at any time by loan recipients which may have contributed to some arrears.¹⁴

The Household Budget Scheme (HHB)

What is it?

The Household Budget Scheme is facilitated by An Post in partnership with the Department of Social Protection (DSP) and is used by those getting certain social welfare payments in Ireland to spread the cost of some household bills over the year. Under this scheme, a fixed amount is deducted from social welfare payments each week and sent by the Department of Social Protection via An Post to the elected service provider.

Who is eligible?

The scheme is operated by An Post and in order to qualify, applicants must be getting a specified social welfare payment paid through the post office. All main social welfare payments are covered, though some payments from other Departments (eg. community employment scheme) are not included.

What bills can be paid under the HHB

Local authority rent and Housing Assistance Payment (HAP) contributions (for new applications, from 1 January 2014, applicants cannot withdraw from the scheme without the consent of the housing body and loan repayments to LAs go through this mechanism)

ESB

Bord Gáis

Eir

Airtricity

Postmobile (prepaid mobile phone services)

Personal Microcredit Pilot Scheme (It Makes Sense loans)

Lough Payment Scheme (payments from pre-2014 existing MABS clients)

As will be seen later in this report many local authorities after initially starting a caravan scheme subsequently stopped or suspended the scheme in their areas. Responding to the discontinuation of schemes by local authorities, National Traveller MABS lent their support to the design of a Caravan Loan Guarantee Scheme intended to enable Travellers to avail of loans at affordable rates from the credit union for the upgrade, repair or replacement of a caravan. National Traveller MABS was established in 2005 to support the Money Advice and Budgeting Service (MABS) on money matters relating to members of the Traveller community. The mission of National Traveller

¹³Citizens Information Board

(http://www.citizensinformation.ie/en/social_welfare/irish_social_welfare_system/claiming_a_social_welfare_payment/household_budget_scheme.html)

¹⁴ National Traveller MABS (2015) *An overview of the implementation of the Caravan Loan Initiative by Local Authorities*

MABS is to empower Travellers by advocating for equality of access to legal and affordable financial services and to support the development of relevant skills.¹⁵

The first loan initiative by National Traveller MABS utilised a €40,000 fund made available by Clann Credo, a community loan finance organisation, to establish a caravan loan scheme enabling loan recipients to buy or repair a caravan. Local credit unions facilitated loan access while loan repayments were deducted at source from loan recipients' social welfare payments through the HHB scheme. The loan payments were processed through a loan repayment mechanism known as the MABS 'Lough Payment' Scheme which was established by Lough Credit Union and Cork MABS over 20 years ago to enable MABS clients pay creditors other than a local authority or utility companies. This mechanism allowed for the transmission of funds from MABS to the relevant credit union and was particularly valuable for financially vulnerable people who may have been excluded from mainstream financial institutions. Following on from the Clann Credo-funded initiative, NT MABS partnered with two local authorities, Dublin and Wicklow, to form two further funded loan initiatives which again utilised the credit union, An Post and the Lough Payment Scheme as key mechanisms in the access and repayment of loans.

In early 2014, MABS reported that approximately 400 of their clients split across 25 of their services were supported in the payment of their debts through the Lough Payment Scheme.¹⁶ The success of the National Traveller MABS supported Caravan Loan Guarantee Scheme was built on an adherence to the Jones' model for successful loan guarantee schemes¹⁷ and its core elements of straightforward loan applications, loan access through a trusted financial institution (credit union), and repayment deductions at source were all appealing factors for Travellers.¹⁸ Also, importantly, the change to the HHB scheme meant that the cancellation of deductions at source, which was cited by local authorities in the past as the main reason loans were defaulted on, now required a letter of authorisation from the relevant lending body, thus making it more difficult for a loan recipient to stop their repayment plan.¹⁹

The success of the NT MABS Caravan Loan Guarantee Scheme was immobilised however by the Social Welfare Act 2012, which included legislative changes in respect to budgeting in relation to social welfare payments.²⁰ Under this legislation repayments to housing bodies could not be stopped or changed without the agreement of the housing body. Changes were also made to creditors being limited to local authorities and utility companies.²¹ These changes came into effect

¹⁵ Stamp, S (ed.) (2011) *Issues of Personal Finance within the Traveller Community: A study exploring the findings of the Local Area Development work undertaken by National Traveller MABS 2007-2011*. NT MABS

¹⁶ National Traveller MABS (2014) *Discontinuation of the Lough Payment Scheme for MABS clients nationwide position paper*.

¹⁷ Jones, P. (2003) *Credit Unions and Loan Guarantee Schemes: a study into the development of financial services for the over-indebted*, Liverpool: John Moores University.

¹⁸ Stamp, S. & Daly, L (2015) *A Review of National Traveller MABS supported Caravan Loan Guarantee schemes*.

¹⁹ http://www.citizensinformation.ie/en/social_welfare/irish_social_welfare_system/claiming_a_social_welfare_payment/household_budget_scheme.html

²⁰ Social Welfare Act 2012 (https://www.welfare.ie/en/downloads/swact_12.pdf)

²¹ National Traveller MABS (2014) *Discontinuation of the Lough Payment Scheme for MABS clients nationwide position paper*

in March 2014 and immediately impacted on the MABS arrangement with the Lough Credit Union and the Lough Payment scheme which had been a recognised HHB scheme creditor since 1997.²² As a result, the Lough Payment Scheme for MABS clients was discontinued.

National Traveller MABS' reaction to the policy decision to discontinue the Lough Payment Scheme was to state that the scheme should never have ceased and it recommended it be reinstated, as it had supported the most vulnerable in Irish society in managing their finances and accessing legal credit. Importantly for National Traveller MABS the incorporation of a savings element into the repayment of loans provided the opportunity for Travellers to access credit independently in time, building up a proven savings history, and is a key element of financial inclusion and community participation.²³

The Lough Payment Scheme

What was it?

The Lough Payment Scheme was an extension in 1997 of the HHB scheme to facilitate MABS clients around the country to pay additional creditors, other than local authorities and utilities.²⁴ Examples of debts being paid via the Lough Payment Scheme were credit union loans, Garda fines and alternative caravan loan scheme repayments.

Who was eligible?

MABS clients who could be classified as financially excluded.²⁵ (In early 2014 there were 400 MABS clients using the Lough Payment Scheme)

How did it work?

Deductions were taken at source and directed by An Post HHB scheme through the Lough Payment Scheme to pay creditors. Cork MABS facilitated the transfer of payments to participating local MABS offices and NT MABS then distributed separate payments for each client to each separate credit union and other debtors.

Why did it stop?

The Social Welfare Act 2012 made changes to the creditors that can be paid under the HHB scheme and requires An Post to have an agreement in place with all relevant creditors to make deductions from an individual's social welfare payment. An Post were notified by the Department of Social Protection to cease payments to new applicants through the Lough Payment Scheme as legislation had changed.²⁶ NT MABS were notified by the Department of Social Protection that

22 Stamp, S. & Daly, L (2015) *A Review of National Traveller MABs supported Caravan Loan Guarantee schemes*. NT MABS.

23 Ibid.

24 Also known as MABSLink and Cork MABS Household Budget

25 Financial exclusion is defined by the European Commission as "a process whereby people encounter difficulties accessing and/or using financial services or products in the mainstream market that are appropriate to their needs and enable them to lead a normal social life in the society in which they belong."

26 Source: An Post

as of March 2014 the HHB deductions were to be stopped for any new MABS clients using the Lough Payment Scheme.²⁷

There are still payments being processed through the Lough Payment Scheme but no new accounts are being set-up.

A review of the National Traveller MABS supported Caravan Loan Guarantee Schemes included the following two recommendations in its report:

- That the Department of Environment, Community and Local Government ensure that all Local Authorities are adequately funded to provide caravan loans where needed for those in local authority halting sites. Thus, that the previously discontinued scheme be re-instated and re-constituted.
- That the Department of Finance and the Department of Social Protection support the establishment of a personal micro-lending scheme for the financially excluded and those on low income and that any proposed personal micro-lending scheme should address financial exclusion.²⁸

December 2015 saw the launch of a pilot microcredit scheme (*It Makes Sense Loan*) by the Department of Social Protection, which is now available in more than 100 credit unions. The scheme is available to social welfare payment recipients who collect their payment in cash from a branch of An Post, have access to the HHB scheme and are members of a credit union. The loan value ranges from €100 to a maximum of €2,000, with an interest rate of no more than 12.7% APR and to be paid back over a maximum of two years. The need for such a scheme was highlighted in a proposal submitted to the Minister for Social Protection in late 2013 by the Citizen Information Board (CIB) in consultation with MABS who were concerned at the number of MABS clients finding it difficult to access low-cost credit and were subsequently seeking out moneylenders to provide loans at high interest rates.²⁹ The piloted scheme was a success and the *It Makes Sense Loan* was rolled out across all credit unions in the Republic of Ireland on a voluntary basis.³⁰ The Project Manager for this micro-credit scheme explained some of the background and key challenges of the scheme for this research to the Housing Agency.

Legislation was brought through in November/December 2015 to enable the payment mechanism of the HHB to be used to process payments to credit unions offering the loans. Currently regulation is being drafted by the Department of Social Protection to enable a savings mechanism as well as repayments to go through the *It Makes Sense Loan*. Agreement has been reached that it can go ahead while the regulations are being drafted.

²⁷ Source: NT MABS

²⁸ Stamp, S. & Daly, L (2015) *A Review of National Traveller MABS supported Caravan Loan Guarantee schemes*. NT MABS.

²⁹ Citizens Information Board (<http://www.citizensinformationboard.ie/en/news/2015/news20151204.html>)

³⁰ Citizens Information Board

(http://www.citizensinformation.ie/en/money_and_tax/personal_finance/loans_and_credit/microcredit_loans.html)

Credit unions underwrite 100% of the loans and the full risk sits with the credit unions. Credit unions signing up to the scheme need to firstly get Board agreement for a change in policy for this scheme (whereby loans can be offered to people with default records, or no record of savings). The credit union also has to enter into a legal agreement with An Post to access the Household Budget Scheme.

Some challenges with the *It Makes Sense Loan* have been:

- The debtor can end or amend repayments at any time through the HHB (not mandatory as with housing repayments).
- Housing repayments supersede the credit union repayments, therefore if housing repayments increase, deductions may be made by the HHB to credit union repayments, if exceeding the 25% income limit.
- There were some issues with a small minority of people thinking they were entitled to a loan.

On the other hand, research carried out on repayments showed that only 1% of the *It Makes Sense Loans* have been written off and there were just a further 3% of loans which the credit unions had concerns about. This compares with an average rate of 8% of general loans that credit unions would write off.³¹

1.9 Report structure

This report consists of six chapters. Chapter Two provides the results of the local authority survey, providing data on the numbers of local authorities operating the scheme, the key financial data, what is and isn't working well with the scheme, the reasons for not stopping the scheme, how relevant the scheme is, application processes and alternative schemes that are, or were, in operation. Chapter Three provides the analysis of the written submissions made by stakeholders including their views on the operation of the scheme, how well it is working, if it is still relevant and the alternatives. Chapter Four contains a summary of the in-depth interviews, plus more detailed notes taken from each of the eight meetings. Chapter Five provides the key findings and Chapter 6 recommendations from this research.

³¹ Project Manager - *It Makes Sense Loans*
Review of the Caravan Loans and Grants Scheme

Chapter 2

Local Authority Survey

Chapter two provides information and analysis on the operation of the Caravan Loan Scheme using data gathered from local authorities in January and February 2017.

2.1 Methodology and participation

On 5th January 2017, local authorities were asked to participate in a survey as part of the Review of the Scheme of Loans and Grants for Purchase of Caravans by Travellers. All 31 (100%) local authorities have returned data.³²

The initial survey design by the Housing Agency was based on the Terms of Reference (See Appendix A). A draft questionnaire was produced by the Housing Agency and reviewed by the Department of Housing, Planning, Community and Local Government (DHPCLG). The draft questionnaire was then tested by Wicklow and Limerick City and County Local Authorities.³³

The Department of Housing provided the contact names within local authorities of housing officials that normally deal with Traveller related housing matters. Where the Housing Agency had contact names for others these were included in the email as well.

All local authorities were sent an email with a link to a survey in SurveyMonkey to complete. They were also sent an individualised Excel file with data provided by the Department of Housing from their records for each local authority. This data recorded grants recouped by local authorities from the DHPCLG. The Excel spreadsheet also contained data provided by National Traveller MABS to the Housing Agency on loans by local authorities for the years 2012 to 2015.³⁴ This information had been collected in 2016 following a Freedom of Information Request from National Traveller MABS to all local authorities. Local authorities were asked to check, update and amend this data and return it, as well as the questionnaire, to the Housing Agency.

2.2 Operation of the Caravan Loan Scheme

Of the 31 local authorities participating:

- 19 (61%) had stopped or suspended the scheme.
- 12 (39%) currently operate a scheme.³⁵

Almost 40% of local authorities currently operate a scheme. Nineteen local authorities reported having operated the Scheme, but had subsequently stopped or suspended it. The main reason given by 14 (70%) for suspending the scheme were high levels of arrears, or non-repayment of

³² Not all LAs were able to complete all sections of the survey.

³³ Thanks to Mary Rose Walker, Patricia Phillips and Patricia Liddy for testing the questionnaire.

³⁴ Thanks to the National Traveller MABS team for the information provided.

³⁵ DLR is not officially operating a scheme, but provided loans in 2011 and 2016 and has a budget for 2017 for caravans and so has been included in this group.

loans. Fifteen of the 19 local authorities suspended/stopped their schemes before the 1st January 2014. The reason this is noted is that from this date payments to local authorities through the HHB were no longer able to be stopped by the debtor without the agreement and a letter from the local authority to An Post.

The next most common reason was that there was little or no demand for the scheme in the local authority ($N=7$, 35%).

Other reasons were concerns regarding fire safety, Travellers being able to source and purchase caravans more cheaply themselves, caravans not being suitable for long-term living and the lack of halting sites in some areas.

Table 2.1 provides detail of whether the local authority operates a scheme, the years the scheme was/is in operation in each local authority area and the reasons given by local authorities for stopping/suspending schemes.

Table 2.1: Caravan Loan Status by Local Authorities

Name of Local Authority	Currently Operating the Scheme	Years of Operation of Scheme	Reason for Suspending/Stopping Scheme
Carlow	Yes		
Cavan	No	2000-2002	Very little demand
Clare	Yes		
Cork City	Stopped/Suspended	2003 to 2016	Non-repayment of loans
Cork County	Stopped/Suspended	Not officially suspended	No demand
Donegal	Stopped/Suspended	2000-2003	Non-repayment of loans
Dublin City Council	Stopped/Suspended	2000-2009	Non-repayment of loans
Dún Laoghaire-Rathdown	Not officially operating	2001-2009	No demand (enough accommodation in the PRS) reason for stopping. (Note: loans in 2011 and 2016 therefore some level of demand now)
Fingal	Yes		
Galway City	Stopped/Suspended	2000-2007	Non-repayment of loans, use of caravans for illegal encampments
Galway County	Stopped/Suspended	Circa 2000	Non repayment of loans Caravans cheaper if purchased privately Greater demand by Travellers for housing. Some caravans have adjustments made to the original structure e.g. solid fuel stove insertion that give cause for concern
Kerry	Stopped/Suspended	2000-2002	Non-repayment of loans

Name of Local Authority	Currently Operating the Scheme	Years of Operation of Scheme	Reason for Suspending/Stopping Scheme
			Caravans not used for intended purposes Non suitability of sites and availability of services
Kildare	Yes		
Kilkenny	Yes		
Laois	Stopped/Suspended	2000 -2008	Non-repayment of loans and caravans deemed not suitable for habitation.
Leitrim	Yes		
Limerick City & County	Stopped/Suspended	2000-2013	Non-repayment of loans
Longford	Stopped/Suspended	2000-2015	Non-repayment of loans High arrears Preference for Standard Housing
Louth	Yes		
Mayo	Stopped/Suspended	2001 and 2005	Non-repayment of loans No suitable bays.
Meath	Stopped/Suspended	2000 to 2011	Non-repayment of loans and accumulation of arrears.
Monaghan	Stopped/Suspended	2000-2013	Fire safety standards Non-suitability for long term living Also no demand
Offaly	Stopped/Suspended	2000-2012	Non-repayment of loans
Roscommon	Stopped/Suspended	2000-2005	Unsustainable, due to high level of arrears
Sligo	Stopped/Suspended	2000-2005	No documentary evidence on file for reasons why, but non-repayment of loans reported as an issue.
South Dublin County Council³⁶	Yes		Was suspended due to high level of arrears but a new scheme launched in 2016
Tipperary	Yes		
Waterford	Yes		
Westmeath	Stopped/Suspended	1999-2006	Non-repayment of loans
Wexford	Stopped/Suspended	2001-2003	No demand
Wicklow	Yes		

³⁶ New scheme put in place but issues still to be resolved before it becomes operational.
Review of the Caravan Loans and Grants Scheme

2.3 What is working well - LAs currently operating the scheme

Local authorities were asked to comment on what was working well with the caravan loan scheme in operation in their area. The two main areas that local authorities reported were working well were:

- Assessment process for loans
- Repayment mechanism through Household Budget Scheme (HHB)

The assessment process is working well in many of these local authorities. One local authority said that there is an individual conversation outlining the purpose, process and commitments involved with applicants. The process has been streamlined in some and a quick turnaround was mentioned by another.

Another five mentioned that the HHB is an effective mechanism for collecting loan repayments, especially since changes to the legislation.

“Fingal operated a scheme between 2007 and 2012. Suspended due to level of repayments and then started again. Household budget working really well for repayments. Far fewer arrears issues. Minister changing household budget transformed the scheme.”

One local authority said it: “works with authorised caravan suppliers regarding identification of suitable caravans, delivery and installation.” Another local authority identifies three to four caravan options (Clerk of Works and Caretaker visit suppliers) and Traveller applicant chooses from the options.

At least two local authorities have Traveller Caravan Loan committees that meet to decide on the awarding of the loans.

2.4 What is not working well - LAs currently operating the scheme

The following were the main areas that were highlighted by local authorities as not working so well.

- Maximum loan amount is not enough
- Following up on arrears is difficult
- Achieving value for money from caravan suppliers

Local authorities reported that the maximum loan amount is not adequate to cover the cost of a caravan in reasonable condition and has not kept pace with the increasing costs of caravans. However, one local authority was wary that any increase in loan amounts could impact the price of caravans.

Following up on arrears was difficult for some. One local authority found that applicants being able to cancel household budget repayments was a problem³⁷, while another loan applicant had

³⁷ This is no longer possible under changes made to the Household Budget Scheme.
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left the jurisdiction. One local authority said going to court is not an option for non-repayment of loans as it would cost too much to be worthwhile. However, another local authority said it vigorously follows up on arrears and has taken one debtor to court.

A couple of local authorities had issues to do with ensuring value for money from the suppliers of caravans and ensuring the processes in place worked. Fingal has recently introduced a new process whereby applicants must have quotes from three different suppliers when applying for a loan. Some local authorities source the caravans from the suppliers and provide the Traveller applicant with three or four options. The local authority ensures that the caravan is fire compliant and gas and electrics inspected. One local authority buys the caravan directly from the supplier and then organises the loan for the applicant with some of the cost of the caravan being absorbed by this local authority, as an official stated: *“Six and half thousand, what kind of quality can you get with this amount and would be in breach of fire safety”*.

Other areas mentioned by local authorities were; difficulty establishing whether an applicant had previously been given a caravan loan by another local authority; difficulty for younger Travellers qualifying to buy their first caravan; borrowers being unable to get private insurance; caravans being vandalised, destroyed or removed from sites; caravans being sold and replaced with inferior ones; length of process; lack of halting sites; not reaching the most vulnerable people (those on side of road or in very difficult financial situations); local authority paying costs of maintenance; objections from Travellers to the repayment length and interest attached.

There was also the view by some local authorities that applying for the grant element from the DHPCLG was not straightforward. There was too much paperwork, it was too time consuming and there was a lack of clarity around eligibility.

2.5 Changes that could be made to the scheme to improve it

Local authorities were asked what modifications could be made to the scheme to improve it and the following suggestions were made:

- Modifications suggested to improve the scheme were to increase the amount of the loan (€9,000, €10,000, €12,500 and €16,000 were some sums mentioned)
- Reduce the deposit amount required³⁸
- Make repayments mandatory through the HHB
- Enable borrowers to insure the caravans³⁹ (defaults due to death or fire damage and the borrower being unable to reside in the caravan). According to one local authority it is impossible to get insurance on caravans unless the applicant has home insurance on a ‘bricks and mortar’ home
- A national tendering system for caravan suppliers
- Define what is meant by a caravan

³⁸ Not all local authorities insist on a deposit of 10%

³⁹ According to one LA an alternative scheme operated through NT MABS and the Credit Union had insurance cover

Two local authorities reported that forming a Caravan Loan Committee to oversee the granting of loans had improved the application processes. In one local authority the committee includes a social worker, inspector, member of finance team and staff from the Traveller accommodation section. In the other the committee is made up of the welfare officer, the administrative officer and the site caretaker.

One local authority has made changes to the procurement process requiring three suppliers to provide quotes and applies different loan amounts depending on the size of the household applying. While another local authority would like more detailed regulations and qualifying criteria to be set for the caravan loan.

Of the 12 local authorities currently operating a scheme, two thought it was no longer relevant as there is a move to standard housing and one felt it should be ended.

2.6 Scheme finances

2.6.1 Maximum caravan loan amount

The maximum loan amount provided by local authorities currently operating a loan scheme ranges from €5,710 to €10,000 (under special circumstances one LA has granted loans of €20,000), with an average maximum loan amount of €7,214. One local authority also provides an allowance for heating equipment on top of the loan.

None of the local authorities commenting on the maximum amount that can be lent thought that it was enough to cover the cost of a caravan. Local authorities thought that a modern caravan could cost anywhere from €11,420 to €20,000.

A once-off first-time buyer (FTB) grant of 10% of the loan (maximum of €640) is made available under the scheme. Local authorities were asked did they recoup this grant for caravans from the DHPCLG. Six of the 12 local authorities currently operating a scheme recoup this grant from the DHPCLG, six do not (two of whom reported that they didn't know they could and one thought it might be because the paper work was too time consuming). Five of the local authorities recouping this grant amount deduct it from the loan amount payable to the local authority by the Traveller loan applicant.⁴⁰

Local authorities operating a scheme were asked if the grant amount available under the first-time purchaser grant was appropriate. One local authority, not currently applying for the grant, thought it wasn't appropriate as no deposit is required, another thought that only permanent accommodation should qualify for such a grant, while another thought that the grant should be enough to incentivise the limited number of cases where it is an option, as it is much more cost efficient than other accommodation options, including emergency accommodation. Another local authority thought that the grant could be higher as the cost to the State of building a house is so much more than the cost of a caravan. Finally one local authority thought that the grant should be available to all applicants, not just first time buyers.

⁴⁰ One LA did not reply to this question.
Review of the Caravan Loans and Grants Scheme

Table 2.2 provides a breakdown by local authorities that operate a scheme of the maximum amount lent, and individual comments on whether the amount is appropriate.

Table 2.2: Maximum amount of Caravan Loan and if appropriate-LAs Operating Scheme

Name of Local Authority	Current Max Amount that can be lent by LA	Is the Max Appropriate?	Comments on Costs of a Caravan
Carlow	€6,340 (inclusive of the €640 grant)	No	The amount of the loan could be reviewed to keep pace with the rise in mobile home costs. However, the council is mindful that any increase in the loan amount may give rise to an increase in the price of mobile homes.
Clare	€5,710	No	Modern caravan in good condition would cost twice that.
DLR	Not a set amount	No (original scheme)	Thinks that a mobile could cost up to €16,000 and that could be 6-8 years old.
Fingal	€10,000 max amount is dependent on specific cases with flexibility	Yes	<p>Different loan amounts depending on family size - have three amounts for couple/single person approx €4,000, family with 2 children €8,000 and a larger family could be up to €10,000.</p> <p>Guidelines from the Department are out of date. Need to be reviewed and updated. Maximum loan amount is not enough. Dealing with suppliers. Value for money Grant hasn't changed over the years. Would see a case for a higher level of grant.</p> <p>When compared to the State building a house the grant amount is very small. A higher grant (maybe €1,500 to €6,000) would be able to either a) get a better quality caravan or b) reduce the cost of repayments. Grant should be for all, not just FTBs. Need to make sure that the caravans being purchased are of good quality.</p>
Kildare	€6,500 plus allowance for heating equipment	Don't Know	The amount does not cover the cost of a good condition 3-bed mobile home, which can be in the region of €20,000. Maximum loan repayment period is 5 years. All applicants are on social welfare so on small incomes. Local Authorities are absorbing a substantial loss when purchasing mobile homes above the loan threshold.
Kilkenny	€6,110	No	Restricted in what they can buy, size, quality etc. Caravan prices have increased since 2000, loan limit

Name of Local Authority	Current Max Amount that can be lent by LA	Is the Max Appropriate?	Comments on Costs of a Caravan
			has not increased. Max loan amount is not adequate to allow Travellers purchase a reasonable priced caravan.
Leitrim	€6,350	Don't Know	No demand in last 6 years so don't know
Louth	€6,350	Don't Know	
South Dublin CC	€10,000 but under specific circumstances loaned up to €20,000	Don't Know	€10,000 is not sufficient to buy a new mobile but if more is loaned then there must be some assured method of repayment
Tipperary	€6,500	No	The current full cost of a mobile home of good standard could be between €10,000 and €15,000. Not sufficient to procure a good quality unit
Waterford	€9,000	No	€10,000 might be more appropriate. After this need to consider value for money and provide longer term accommodation. Looking at demountables and steel sheds. Costs €20K for homeless accommodation.
Wicklow	€6,500	Don't Know	Sure the mobiles cost more than that, and that families have to add their own funds to it, but it seems to work.

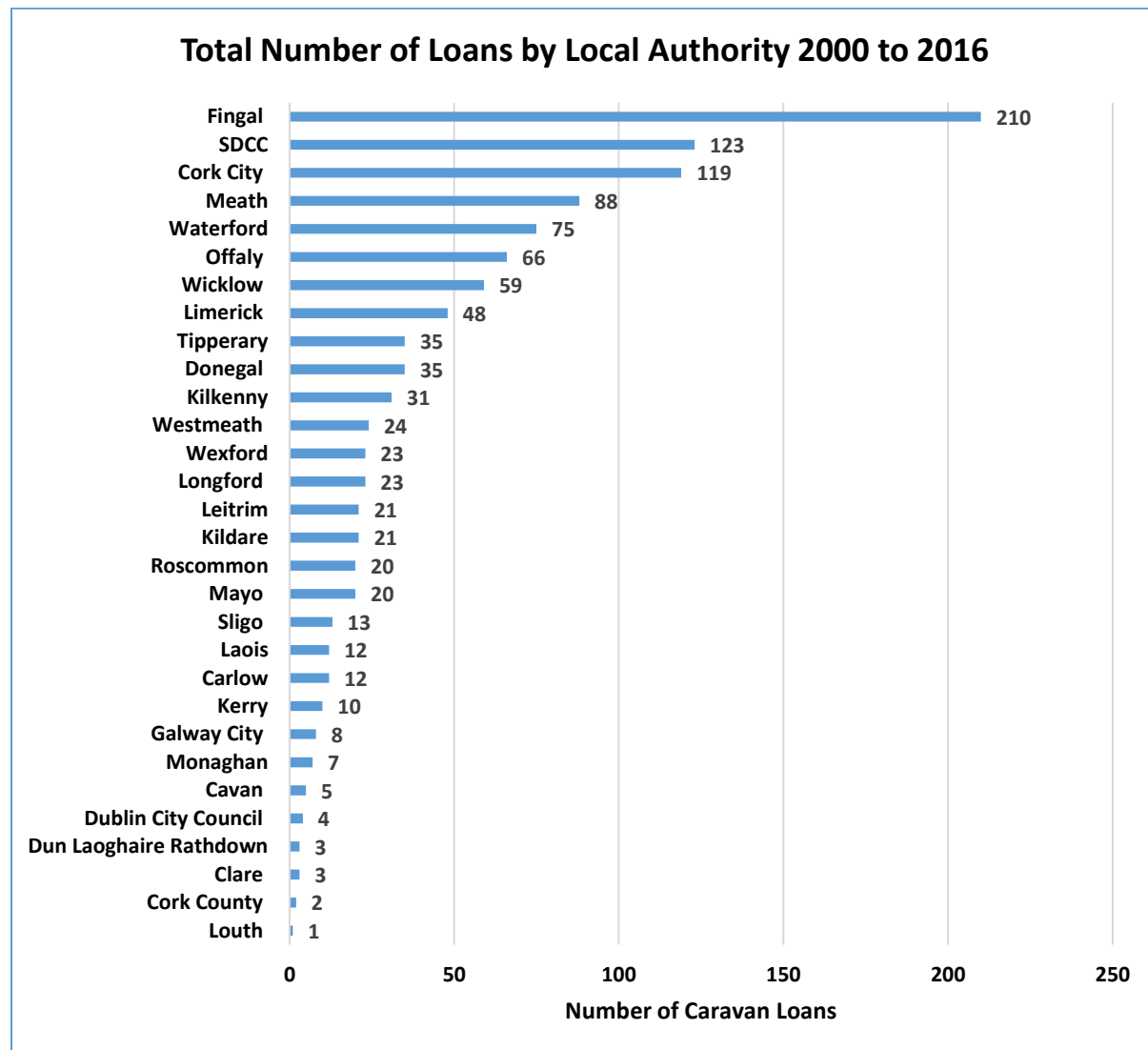
2.6.2 Number and sum of loans – all local authorities

There was a total of 1,121 loans issued by local authorities during the period 2000 to 2016. The number of loans ranged from a total of 210 loans by Fingal to one loan in Louth during the period 2000 to 2016. There was €6,275,521 lent to Travellers by local authorities for these caravan loans.⁴¹

Figure 2.1 shows the total number of loans by local authorities that were provided over the period 2000 to 2016 and Figure 2.2 shows the sum of loans. Figure 2.3 shows the total number of loans by year provided for caravans, this comes to a total of 864 loans as not all local authorities were able to provide data by year. Appendix C contains a breakdown by local authority and year.

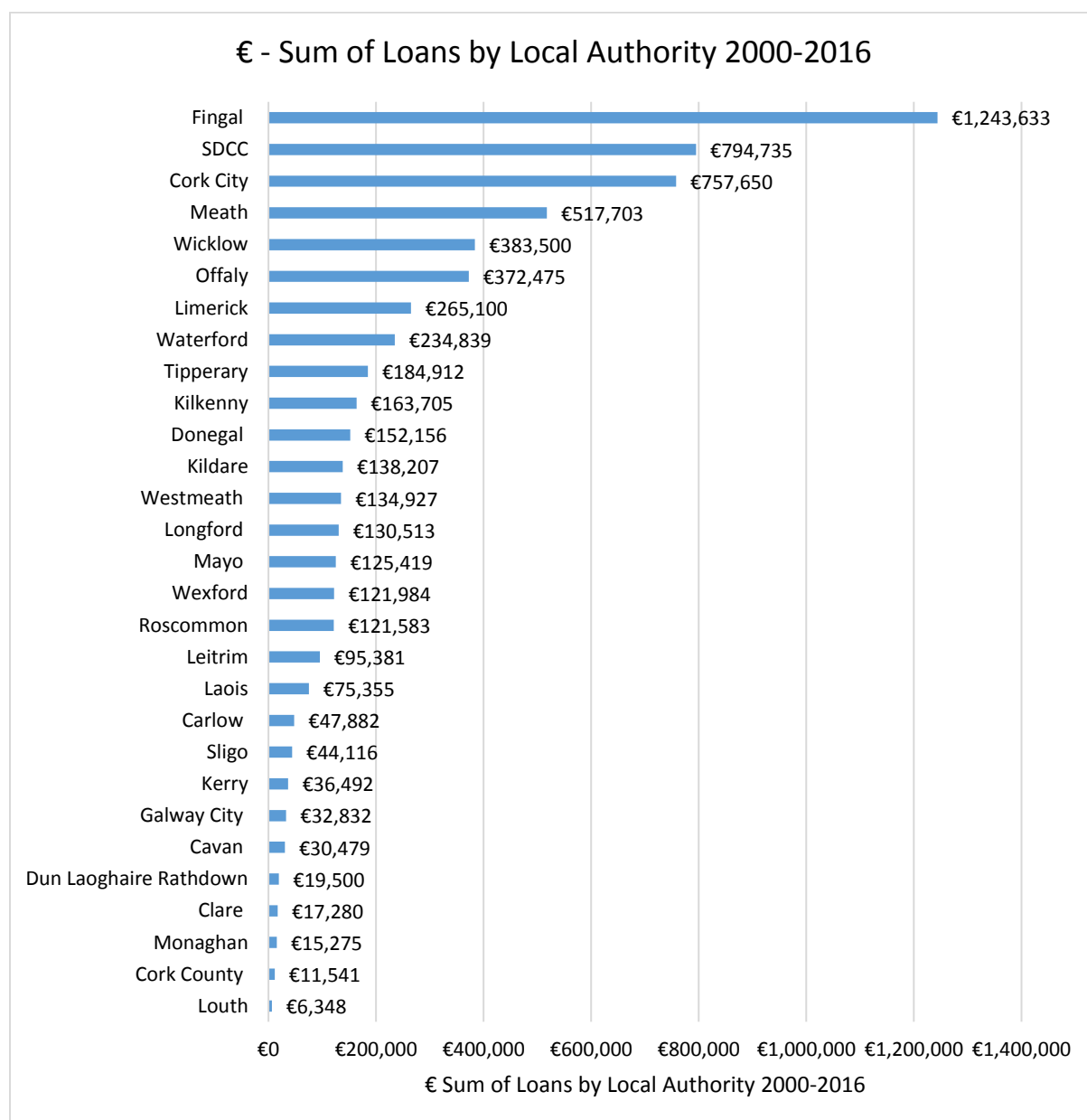
⁴¹ No data on numbers or sum of loans supplied for Galway County. The number of loans (4) for DCC was available but not the amount lent. DLR supplied data for 2011 to 2016, no data available prior to this. This data needs to be treated as an approximation as some local authorities were not able to supply data for all years of the operation of the scheme – see Table 2.3

Figure 2.1: Number of Loans by Local Authority



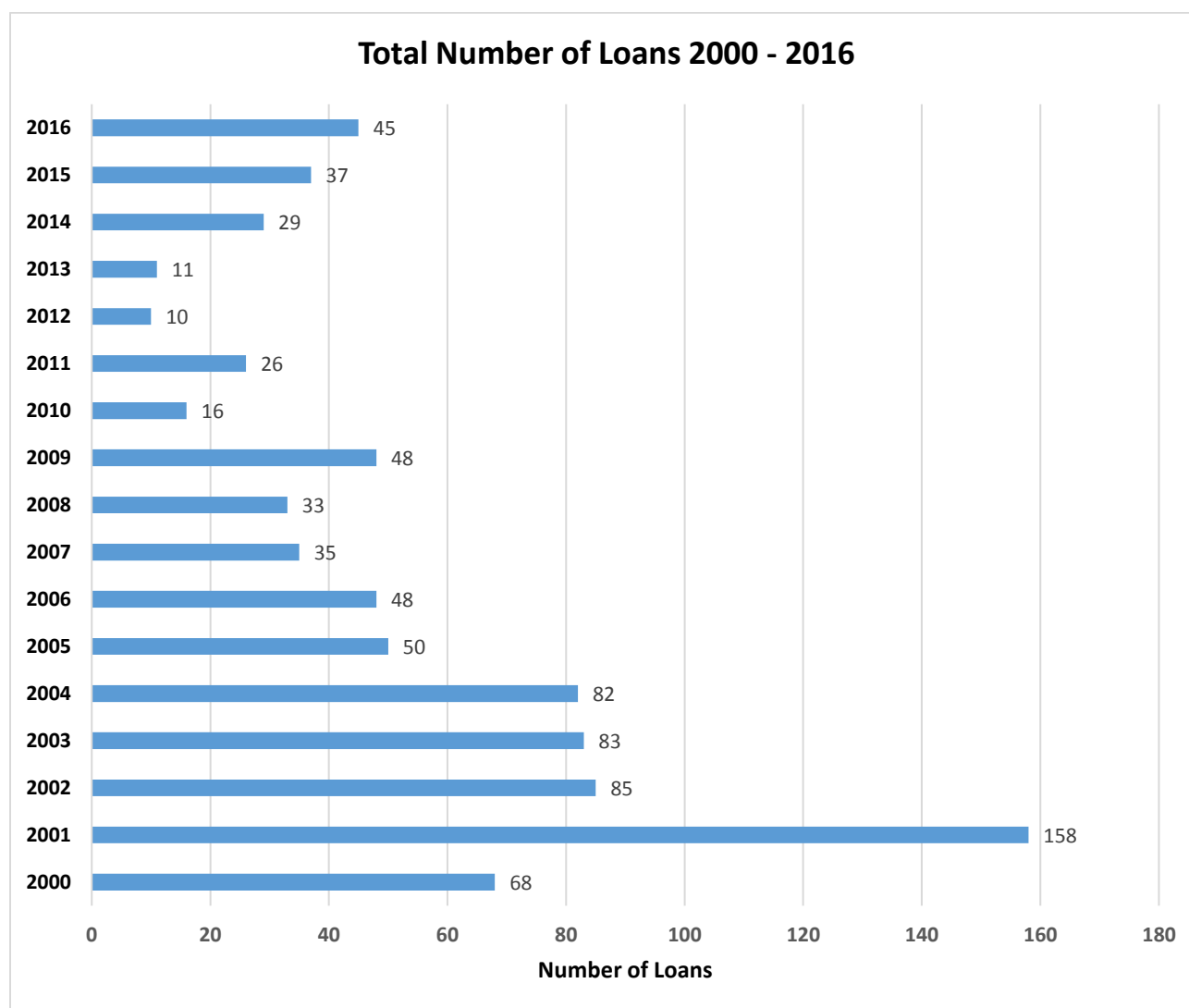
Note no data was available on loans for Galway County. Dun Laoghaire Rathdown and Clare data available only since 2011. Kildare missing years 2000, 2002, 2012 - 2015.

Figure 2.2: Sum of Loans by Local Authority



Note no data was available on sum of loans for Galway County and Dublin City Council. Dun Laoghaire Rathdown and Clare data available only since 2011. Kildare missing years 2000, 2002, 2012 - 2015.

Figure 2.3: Total Number of Caravan Loans by Year 2000 - 2016



Note not all local authorities were able to provide a breakdown of caravan loans by year. Local authorities not included are DCC, Roscommon, Monaghan, Sligo, SDCC, Wicklow, Kilkenny and Galway County. Appendix C contains a detailed table of the loans by year by local authority.

2.6.3 Repayment of loans

In total, there were 1,121 loans reported by local authorities as being lent between 2000 and 2016. Of these 27% were reported as being repaid and another 6% which are currently being paid back. Quite a few of the local authorities were not able to provide detailed financial data on repayments. A breakdown by local authority is provided in Tables 2.3 and 2.4.

There were 594 loans issued by local authorities currently operating the scheme between the years 2000 and 2016.⁴² Fingal provided 210, or 35%, of these loans. Fingal was unable to provide data on the number of loans that have been repaid. Excluding Fingal from further analysis

⁴² Data only available for some years from some local authorities.
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45% (N=139) of caravan loans had been repaid in full by December 2016 and a further 23% (N=70) were currently being repaid. There were approximately 115 loans (37%) which were outstanding and were not being repaid, excluding Fingal.⁴³ Table 2.3 provides details, where available, on the numbers and sums of loans taken out for caravans and the amounts paid back.⁴⁴

Nineteen local authorities no longer operating the scheme provided data on 527 loans as being provided amounting to a total loan amount of €2,939,302.⁴⁵ The information available shows that 31% of loans had been paid back in full (161 loans) and there were a further 26 (5%) which were currently being paid back. At least 45% of loans were not being paid back and 14% of these were issued by Cork City. Table 2.4 provides more detail.

Table 2.3: No. and Sum of Loans Issued and Sums Repaid and Outstanding-2000-2016 – LAs Currently Operating the Scheme

Local Authority	Total Loans	Sum of Loans €	No. Loans paid back in full by end of 2016.	Sum of Loans Paid Back (by Dec 2016)	No of Loans Currently being paid back	Sum of Loans Currently being paid back	No. Loans outstanding not being paid back (written off)	No. Loan apps. 2016	Comment
Carlow	12	€47,882	11	€42,212	1	€5,670	0	0	
Clare	3	€17,280	0	0	3	€15,000	0	0	Only have data for last 5 years
DLR	3	€19,500	0	-	3	-	0	-	Data only available since 2011
Fingal	210	€1,243,633	No data	No data	No data	No data	No data	No data	
Kildare	21	€138,207	1	€6,583	3	€10,500	17	1	No data available for 2000 to 2002, 2008, 2012 to 2015.
Kilkenny	31	€163,705	19	€153,056	12	€82,390	0	8	
Leitrim	21	€95,382	9	€39,778	0	0	0	0	No application since 2011
Louth	1	€6,348	0	€121	0	0	1 (€6,227)	10	Loan

⁴³ The most recent data available on local authority mortgage arrears for the last quarter of 2015 show that 28% of all loans were in arrears of over 90 days. This would equate to 4,983 loans with a value of €328,606,945. (<http://www.housing.gov.ie/housing/statistics/house-prices-loans-and-profile-borrowers/local-authority-loan-activity>)

⁴⁴ Complete data was not available from all local authorities for this section.

⁴⁵ This data is not fully complete as not all LAs were able to provide all data for all years scheme in operation.

Local Authority	Total Loans	Sum of Loans €	No. Loans paid back in full by end of 2016.	Sum of Loans Paid Back (by Dec 2016)	No of Loans Currently being paid back	Sum of Loans Currently being paid back	No. Loans outstanding not being paid back (written off)	No. Loan apps. 2016	Comment
									written off in 2005
South Dublin CC	123	€794,735	37 approx.	€238,420 (approx.)	-	0	86 loans (€556,315 (approx.))	0	No data on years provided available
Tipperary	35	€184,912	21	€108,690	10	€24,710	4(€16,827)	0	
Waterford	75	€234,839	2	No data	25	€149,839	Can't confirm	20	Changing staff/merge/ new systems not all data available
Wicklow	59	€383,500	39	€253,500	13	€84,500	7	3	No, but Bray Town Council issued 4 loans
Total	594	€3,329,923	139	€842,360	70	€372,609	115	42	-

Table 2.4: No. and Sum of Loans Issued and Sums Repaid and Outstanding -- LAs No longer operating the scheme

Local Authority	Total Loans	Sum of Loans	No. Loans paid back in full by end of 2016.	Sum of Loans Paid Back (by Dec 2016)	No of Loans being paid back	Sum of all Loans being paid back	No. of Loans not being paid back	Sum. of Loans not being paid back	Years of Scheme
Cavan	5	€30,479	4						
Cork City⁴⁶	119	€757,650	40	€252,650	6	€39,000	73	€348,410	
Cork County	2	€11,542	0	0	0	0	2	€8,754	2000,2001
Donegal⁴⁷	35	€152,156	9	€36,059	0	0	26	€77,913	2000-2006
Dublin City Council⁴⁸	4	No Data Available from DCC							2000-2009
Galway City	8	€32,381	8	€32,381	0	0	0	0	2000-2007
Galway County		No Data Available from Galway County							Circa 2000
Kerry	10	€36,492	4	€10,742	0	0	0	€23,705	2000-2002
Laois County	12	€75,355	4	€21,390	0	0	8	€52,790	2000-2008
Limerick⁴⁹	48	€265,102	29	€215,439	1	0	16	€33,409	2000-2013
Longford	23	€124,663	5	€26,570	6	€29,298	12	€67,935	2000-2015
Mayo	20	€125,419	2	€10,000	1	€1,501.71 so far	16	written off	2001 - 2005.
Meath	88	€517,703					35	€106,961	2000-2007
Monaghan	7	€15,275	4		0		3		2000 to 2013

46 Some of the loans currently not being paid had partial repayments others had the full caravan loan amount outstanding.

47 The non-payment of caravan loans has been a recurring theme.

48 DCC unable to provide any further breakdown.

49 Limerick - Some loans paid off but some have been closed off on the system but may have revenue balances still outstanding on them.

Local Authority	Total Loans	Sum of Loans	No. Loans paid back in full by end of 2016.	Sum of Loans Paid Back (by Dec 2016)	No of Loans being paid back	Sum of all Loans being paid back	No. of Loans not being paid back	Sum. of Loans not being paid back	Years of Scheme
Offaly	66	€372,475	33	Not available	12	€8,905	21	€71,328	2000-2016
Roscommon	20	€121,583	0	No loan repaid in full		0		Balances were written off	2000-2005
Sligo CC	13	€44,116	No data on file						2000-2005
Wexford	23	€121,984	12	€64,058	0	0	2	€4,571	2001-2003
Westmeath	24	€134,927	7	€40,200	0	0	22	€20,956	2000-2006
Total	527	2,939,302	161	709,489	26	78,704	236	816,732	

2.7 Current relevance of the scheme

There were 12 local authorities currently operating a scheme. Two of these think there is less demand in their county, while there are at least another three local authorities that no longer operate the scheme thinking of re-introducing a scheme.

There was an emerging variation between rural and urban local authorities regarding the relevance of the scheme. Many of the urban local authorities reported that the scheme is still relevant, partly because of the lack of available affordable conventional housing options, which is resulting in overcrowding and a deterioration in the quality of accommodation. Local authorities in more rural areas were more likely to say there was no need for a scheme. (See background section 1.1)

Those in need of such a scheme are mostly young couples with children, often forming new family units and seeking to live independently as a family for the first time but also wanting to live close to family who have a history of living in mobile accommodation. However, the profile has changed over the years, partly due to housing shortages, and those at risk of homelessness, as well as a wider spread of ages in some local authorities.

Local authorities no longer operating a scheme were asked if they thought there was still a need for a Caravan Scheme. Ten local authorities (62%) thought there was no longer a need for a scheme. There were few applications to some of the local authorities for halting site accommodation and the move is towards standard and group housing schemes.

However, a different trend is seen in urban areas. Two Dublin local authorities thought there was a need (DCC and DLR) and one of these (DCC) will be re-introducing a scheme this year. SDCC has just recently re-introduced a scheme and Fingal has been operating one for many years. Limerick has been considering different options and Galway City Council thought there was a need for a scheme in specific circumstances.

The need was brought about mainly because of a lack of housing in the area and Travellers living in accommodation that is overcrowded, or dilapidated and not able to afford to replace caravans.

“The chronic lack of available Private Rented, Standard Housing Accommodation and Traveller Specific Accommodation is causing Traveller families to temporarily live together in overcrowded situations meaning that units dilapidate much more quickly due to over-use.”

There were three local authorities that said that there had been implications on Travellers in their area of not operating a scheme, and these were all urban LAs. All thought that the suspension of the scheme was negatively impacting on the quality of accommodation and that housing shortages had led to greater demand and overcrowding in caravans. Overcrowding has an impact on the life-span of the caravan as it deteriorates more quickly.

The main reason that 11 local authorities (65%) thought that stopping the scheme had had few implications on Travellers living in their areas was that there was no demand for the Scheme, no applications were being made and that the preference of Travellers in their areas was, in their experience, for housed accommodation.

2.7.1 Demographic profile

Local authorities (operating the scheme) were asked to describe the typical profile of who was accessing the Scheme over the last few years. Information was asked on previous accommodation, age, relationship status, gender, employment status and number of children.

Caravan loans are mainly being provided to young families with young children, typically those wanting to remain close to the extended family and already occupants of a halting site.

Three local authorities thought that the typical profile had changed over the years the scheme had been in operation and four did not think it had changed. One local authority thought that families starting out would prefer 'housed accommodation' rather than *"beginning a tenancy with a mobile home loan repayment as it would be economically counter-productive."* Another said due to housing shortages people classified as 'homeless' are coming under the scheme and another thought that initially the scheme was for tenants with families on halting sites but that over the past few years the scheme has expanded and there is no longer a typical profile.

Table 2.5: Typical Profile of Travellers Accessing Caravan Loan Schemes

Name of Local Authority	Typical Profile
Carlow	Generally younger individuals or families below forty. Unmarried and living with family until marriage. Overcrowded family home. Recently married and awaiting Local Authority accommodation. Recently separated and wishing to return to family for support. Living in a bay and wishing to remain there. Applicants are generally women, women with children or young couples.
Clare	Persons coming under the "homeless" description.
DLR	Case by Case basis
Fingal	Bigger families. Younger people setting up homes. Occasionally older people. But all ages.
Kildare	Typically used by families living in local authority halting sites. Typically, families who have a history of living in mobile homes. Composition of families - usually larger families 5+children. Unemployment and in receipt of social welfare is high.
Kilkenny	Young married couples with couples with children who wish to live on site close to the parents.
Leitrim	The 21 loans granted by LCC were mostly granted to the following: - to young families with young children - To families who were already accommodated in Service Bays in our existing Halting Sites at Mohill and Carrick on Shannon. No families in County Leitrim are currently accessing the Scheme.
Louth	As only one loan has been granted a long time ago it is difficult respond to this question. We have several applications that are being assessed.
South Dublin	Various and not possible to say it was any specific profile.
Tipperary	Occupants of halting sites who have provided their own accommodation which has gone into disrepair. Couples with young families.
Waterford	In 2016 awarded 10 loans; 4 to single adults; 6 to families (usually two parents and 3-8 children) Usually families in scheme housing and caravan to go in garden to help with sleeping space.

Wicklow	Tenants of halting sites or of basic service bays. Married children of tenants of halting sites or of basic service bays. Married children of tenants of rural cottages with large gardens. It is difficult to identify a pattern in terms of family / age profile. Of the last 5 loans: one was a pensioner on a halting site; one very young couple on a basic service bay; one couple with a large family on a basic service bay; one couple on a halting site took out their 4th loan, the other three having been redeemed in full; one elderly couple on a basic service bay.
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2.8 Application processes

The guidelines set down by Circular letter no. Tau1/2000 form the basis of the processes in the local authorities still operating a scheme. Though there is some variation to note.

Key common points on processes seen in local authorities currently operating a Scheme were:

- Applicants need to be assessed to be in need of social housing
- Caravans only to be supplied by VAT certified/approved Suppliers
- Repayments normally through the Household Budget Scheme
- Some, but not all, local authorities ask for a 10% deposit

There were also some variations in the operation of the scheme between local authorities:

- Inspection of caravan prior to purchase (in Kilkenny the engineering staff inspect, while for example in Wicklow there is no inspection).
- Inspection of site prior to purchase.
- Some LAs will only provide a caravan loan if the caravan is to go on an official halting bay, others have more flexibility.
- Some LAs hold face-to-face meetings with applicants to discuss scheme, terms etc prior to application.
- One local authority suggests that applicants get independent advice (NT MABS or Citizens Information).
- Person processing application varies: social worker, housing officer, caravan committee.
- Some LAs pay for the removal of the old caravan.
- Kilkenny has a detailed certification process for the supplier of the caravan.
- At least one LA has a longer-term repayment period of up to seven years for the loan.
- One local authority requires applicants to sign fire safety requirement forms and a form agreeing that the applicant will not request a reduction in the agreed repayment amounts.

Appendix D contains a description of the application process in local authorities.

2.9 Alternative schemes

2.9.1 Alternative (Non-LA) schemes for caravan loans

Alternative Caravan Loan Guarantee Schemes were operated by National Traveller MABS to enable Travellers access accommodation-related loans at reasonable rates. NT MABS worked in partnership with guarantors (Wicklow local authority, DCC and Clann Credo) and

local credit unions. There was equal sharing of the risk between guarantor and loan provider (credit union). The credit unions, NT MABS and local MABS service undertook the credit risk assessment. The Lough Payment Scheme was seen as fundamental for the Caravan Loan Guarantee Schemes. More detail on these schemes can be found in publications from NT MABS.⁵⁰

In Wicklow, alternative schemes (Clann Credo and Wicklow LA backed) were often used by Travellers turned down for the local authority scheme. Wicklow local authority always maintained its own scheme, alongside the alternative schemes for special cases.

Some advantages of this scheme were that the loans were insured and Travellers built up a credit history. Some disadvantages found were around lengthier times to get a loan, often not through registered suppliers and in some cases loans were provided but no caravan was ever purchased.

In 2008 DCC stopped providing caravan loans, however the Traveller Welfare Section in DCC recognised that Travellers needed to access credit to purchase caravans. A steering committee was set-up made up of representatives from DCC, National Traveller MABS, Exchange House National Traveller Services and the Department of Social and Family Affairs. This resulted in a scheme provided through the credit unions, 50% guaranteed by DCC and with NT MABS providing the lead and support.⁵¹ DCC as will be seen in the next section is now launching a new pilot scheme as the scheme through the credit unions has been stopped.⁵²

One local authority said that in exceptional cases caravans have been provided to Traveller and non-Traveller households in need as no other accommodation was available or because the household would not have been eligible for the scheme. Limerick provides mobile homes from council funds and Donegal replaces caravans through the emergency funding programme (50% recoupable) for reasons of fire, flood, storm etc.

Wexford provides mobile homes on halting sites at an affordable rent. (More in section 2.9.3)

2.9.2 New caravan loan schemes being considered by LAs

Dublin City Council

Dublin City Council is launching a pilot Caravan Loan Scheme in 2017 with possibly four to six loans in the first year. Draft proposals envisage loan amounts between €1,000 and €8,000. Priority will be for tenants on halting sites and official bays. The assessments will be carried out by the social work team and loans will be repaid using the Household Budget (HHB), caravans must be purchased from registered dealers. DCC intend advertising the scheme to all tenants. Applicants will need to have two years rent history with the local authority and be tenants on an official site.

⁵⁰ National Traveller MABS (2014) *Discontinuation of the Lough Payment Scheme for MABS clients nationwide position paper*.

⁵¹ Stamp, S. & Daly, L. (2015) *A Review of National Traveller MABS supported Caravan Loan Guarantee schemes*. NT MABS.

⁵² Source: DCC LA officials

Dun Laoghaire-Rathdown

Dun Laoghaire-Rathdown is considering relaunching a Caravan Loan Scheme on a pilot basis to deal with the worst-case situations. DLR suspended its original caravan loan scheme in 2009, however since suspending the scheme DLR has in certain case by case instances provided loans. Loans were provided in 2011 and 2016 to Travellers to purchase caravans, and there is a budget for loans for 2017. DLR source the caravan and purchase it (could pay up to €20,000). DLR ask up to five suppliers in Leinster/Munster region for quotes for caravans that will be fire compliant. Once the caravan is on site the LA sets up the utilities and the fire safety consultant checks the site. The local authority provides a loan to the Traveller, the loan would not cover the full amount of the cost of the caravan, and ownership is signed over to the Traveller.

In DLR the reasons for relaunching a scheme is due to a variety of reasons: - *“Travellers unable to access funding to purchase new/better units from their own means - Travellers unable to access funding from credit firms. - The chronic lack of available Private Rented, Standard Housing Accommodation and Traveller Specific Accommodation is causing Traveller families to temporarily live together in overcrowded situations meaning that units dilapidate much more quickly due to over-use.”*

South Dublin County Council

South Dublin County Council relaunched its Caravan Loan Scheme in 2016. There has been no take-up yet of the scheme as there are still some points that need to be resolved with the Local Traveller Accommodation Consultative Committees (LTACC) and local Traveller representative organisations. The maximum amount set for loans is €10,000 and the term of loan repayment will be five years. Repayments will be through the HHB and any arrears on old loans must be paid back. Purchase of caravans is currently only through registered suppliers. This scheme is still under development and SDCC is discussing it with local Traveller representative groups. The LTACC in SDCC has set up a sub-committee to look at the scheme. Some issues around the new scheme are the size of loan, term, interest on repayments, payment to remove old caravan and those in need may still not be eligible for a loan.

Limerick City and County

Limerick sees a need for some form of loan scheme, though nothing has been decided yet. Limerick may look at some form of scheme with the credit union and the local authority as guarantor of the loan.

2.9.3 Caravan Rental Schemes

Local Authorities were asked if they thought there would be a potential for a caravan rental scheme. Seventeen of the 27 local authorities responding were not in favour of a rental scheme, while seven were.

Table 2.6: Potential for a Caravan Rental Scheme

Is there a potential for a caravan rental scheme?	No. LAs	Percentage
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Yes ⁵³	7	26%
No ⁵⁴	17	63%
Don't Know ⁵⁵	3	11%
Total	27	100%

One local authority thought a potential rental scheme could reflect options with regards to standard housing rental options and that it would help tenants in financial difficulty. Another thought that there could be potential for a scheme if it was cost effective and was value for money.

Local authorities' concerns regarding a potential rental scheme were to do with the practical day to day issues:

- No insurance cover
- Landlord/tenant liability
- Heavy maintenance responsibility
- Rent repayments
- Vandalism/destruction of caravans
- Short shelf-life of a caravan
- Non-suitability of a caravan for longer term living
- Families would prefer standard/group housing

2.9.4 Wexford mobile home rental scheme

Wexford introduced a Caravan Loan scheme in 2001 but it was stopped in 2003. Some of the reasons were issues were to do with repayments and caravans being sold and replaced with inferior ones.⁵⁶

Wexford has two official halting sites (Bunclody and New Ross) with 12 halting bays on them. In Wexford, the local authority purchases mobile homes second-hand for these bays and rents them to Traveller families.

- Eligibility is dependent on having an official bay and being in need
- Mobile home is sourced by LA, inspected and vetted to ensure that it is in good condition
- Mobile homes cost between €15,000 and €20,000 to supply, place, fit (LA put in oil fired central heating) and set up services
- The maintenance policy is the same as for social housing. Cover wear and tear but not breakages
- Typically, mobile home lasts between five and ten years before needing replacement
- Annex/day house on bay with utility space for washing machine, kitchen/sitting room with stove

⁵³ Yes: Waterford, Kilkenny, Wexford, Cork County, Donegal, DCC and Limerick

⁵⁴ No: Clare, Fingal, Kildare, Leitrim, Louth, SDCC, Tipperary, Wicklow, Galway City, Galway County, Laois, Mayo, Monaghan, Offaly, Roscommon, Westmeath and Cavan

⁵⁵ Carlow, Cork City Council and DLR

⁵⁶ In the completed questionnaire returned lack of demand was provided as a reason as well.

- Occupant pays a fixed rent for bay (covers mobile and annex) of €26 per week. Utility bills on top of this

The local authority official interviewed felt that the scheme, which has been in operation for many years, works and that it is a good idea, particularly for young families with no means starting out. Though modifications on weekly rent would be suggested.

Wexford kindly provided the Housing Agency with information on the expenditure costs for the halting sites. This data covers annual day-to-day maintenance costs, the cost of buying and replacing mobile homes, removal of old mobile homes, upgrading, setting up utilities including heating and connecting to utilities. It does not include administration staff costs (ie. social worker). Looking at the average cost per bay over the years that data has been submitted the average cost of maintenance per bay in Wexford works out at approximately €10,000 per bay per year (this includes costs of purchasing mobile homes over this period).

Table 2.7: Maintenance Costs for Halting Sites in Wexford operating Rental Scheme 2010 to 2015

Halting Site	Expenditure 2010	Expenditure 2011	Expenditure 2012	Expenditure 2013	Expenditure 2014	Expenditure 2015
New Ross	€118,747	€64,590	€40,428	€33,541	€46,833	€79,094
Bunclody	€61,427	€89,318	€58,846	€65,253	€29,113	€37,840
Total	€180,174	€153,908	€99,274	€98,794	€75,946	€116,934

2.9.5 Clare and Dun Laoghaire Rathdown mobile home rental scheme

Clare operates the caravan loan and grant scheme and also a caravan rental scheme.

Clare provided the Housing Agency with figures for maintenance for the years 2014 to 2016 for the Ballaghboy halting site, which contains four halting bays. Total maintenance costs for these bays was €92,461, on top of this there was a cost of €72,000 for the purchase of four mobile homes. These are fixed in place and connected to services. Per bay the maintenance costs (including costs of purchasing the mobiles) works out at approximately €13,705 per bay per year (excluding the costs of purchasing the mobile homes the per bay cost would be approximately €7,705). The total rental received for the three years was just over €12,000 for the four bays. (approximately €20 per week per bay).

Dun Laoghaire Rathdown has purchased mobile homes and rented them to Travellers (Ballyogan and West Pier). Travellers pay rent and the local authority maintains and services the mobile homes.

2.9.6 Comparative maintenance costs for Kilkenny and Carlow

Kilkenny local authority operates a caravan loan scheme but does not operate a rental scheme. Kilkenny Local Authority kindly supplied maintenance costs for the halting sites in Kilkenny covering 20 bays in various locations. The maintenance costs include site skips for removal of site waste (not domestic waste), repairs and maintenance. Currently Kilkenny charges €5.70 a week for a bay where a caravan is parked, or €25 for a bay for a demountable

dwelling. Included in this charge is the use of a day house on halting sites (toilet, shower/utility facilities). Maintenance costs work out at approximately €3,000 per year per bay.

Table 2.8: Maintenance Costs for Halting Sites in Kilkenny operating the Caravan Loan Scheme 2010 to 2016

Halting Site	Expenditure 2010	Expenditure 2011	Expenditure 2012	Expenditure 2013	Expenditure 2014	Expenditure 2015	Expenditure 2016
Various locations 20 Bays	€41,762	€47,479	€60,815	€69,802	€59,696	€70,701	€66,653

Carlow comparative maintenance figures are shown in Table 2.9 which provides the amounts paid for maintenance in respect of seven halting bays in Ardristan, Bestfield and St. Brigid's Place. Travel expenses for the caretaker are included in these figures. The approximate annual average cost is €3,892 per bay per year over the years 2013 to 2015.

Table 2.9: Maintenance Costs for Halting Sites in Carlow operating the Caravan Loan Scheme 2013 to 2016

Halting Site	Expenditure 2013	Expenditure 2014	Expenditure 2015	Expenditure Jan to June 2016
Three locations 7 Bays	€31,182	€30,163	€20,391	€20,305

In summary looking at the average cost per bay over the years that data has been submitted the average cost of maintenance of rental units per bay in Wexford is approximately €10,000 and in Clare €13,705. In Kilkenny, where no rental scheme is in place, it is €3,000 per bay, while in Carlow it is approximately €3,892.⁵⁷

2.9.7 Alternative financing for caravan loans

Local Authorities were asked about alternative methods of providing finance for caravans (e.g. credit union/micro-credit schemes).

Twelve local authorities (46%) thought a scheme operated by the credit union with repayments through the household budget scheme could be an alternative way of financing the caravan loans. A further ten (38%) local authorities didn't know, though some did mention the credit union as being an option.

One local authority saw a positive impact of loans going through the credit union is that there could be some debt relief and the possibility of writing off arrears with the removal of the local authority as the lender. Another local authority thought that acting as the lender was not generally good for building relationships between local authority staff and Travellers.

⁵⁷Many thanks to Ray Colfer, Martha Melbourne, Martin Killeen, Niall O'Keefe, Shane Clarke and Lena Smith in local authorities for providing extra data for this comparison
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Table 2.10: Alternative Financing for Caravans

Do you think there could be alternative methods of providing the finance for caravans?	No.	Percentage
Yes	12	46%
No	4	16%
Don't Know	10	38%
Total	26	100%

Chapter 3

Stakeholder Submissions

3.1 Methodology and participation

A questionnaire for stakeholders was prepared by the Housing Agency based on the Terms of Reference. Stakeholders were emailed at the end of November 2016 and provided with a link to a semi-structured questionnaire in SurveyMonkey, which was to be completed by the 15th December.

Consultation with Dr. Eoin O'Sullivan, Chair of the NTACC and housing officials in the Traveller Unit in the DHPCLG helped inform which stakeholders were invited to submit. These were:

- Irish Traveller Movement, National Traveller Women's Forum, Pavee Point Traveller and Roma Centre and Mincéirs Whiden.
- Chairpersons of all Local Traveller Accommodation Consultative Committees (LTACCs).
- Niamh Milliken as representative of local authority social workers.

Submissions were made by 20 stakeholders. Table 3.1 provides the names of those making submissions.

Table 3.1: Names of Stakeholders making submissions

Name	Organisation	Submission as an individual or on behalf of a group.	Comments/submission reflect a Scheme in a particular Local Authority area
Niamh Milliken	SDCC	Social Worker with SDCC	SDCC
Gus O'Connell	SDCC	Individual	SDCC
Shane Clarke	Carlow County Council	Individual/Carlow CC	Carlow and also anecdotally experiences of other LAs in South East
John Hanley	Dublin City Council	Individual	Dublin City Council
Helena Clark	Kerry Travellers Health and Community Development Project	Kerry Travellers Health and Community Development Project	Kerry County Council
Margaret Newport	Kilkenny County Council	Individual	Kilkenny
Catherine Finn	Waterford City & County Council	Individual	Waterford City & County Council

Name	Organisation	Submission as an individual or on behalf of a group.	Comments/submission reflect a Scheme in a particular Local Authority area
Thomas Erbsloh		Individual (who is & has been working (paid & unpaid) in TravOrgs for approx 30 years	Mostly Cork City and/or Waterford
Eamonn McCann	Wicklow Travellers Group	Wicklow Travellers Group	
Maria Joyce	National Traveller Women's Forum (NTWF)	NTWF	
Lynsey Kavanagh	Pavee Point Traveller and Roma Centre	Pavee Point Traveller and Roma Cente	
Stephen	Clondalkin Travellers Development Group	Group CTDG	South Dublin CC
Martin Ward	Western Traveller and Intercultural Development Ltd	WesttravGalway Co Co	Galway Co Co
Accommodation Officer	Irish Traveller Movement	Irish Traveller Movement	
Maedhbh Firmino	Galway Traveller Movement South East Galway	Galway Traveller Movement South East Galway	Galway City/ Galway County Councils
Emma Gilchreest	Offaly Traveller Movement	Group	Offaly Co Co
Christina Boland	ITTralee	Individual	Kerry
Ciara Cunningham	St. Catherine's Community Services Centre, Carlow	Behalf of St. Catherines Community Services Centre	Carlow
Pippa Daniel	Mayo Travellers Support Group (MTSG)	MTSG	
Heather Rosen		As an individual	Clare County Council

3.2 Overall effectiveness of the scheme

Five stakeholders agreed that the scheme had been effective in improving the quality of caravans and thus improving the quality of life for Travellers living in them. Though some

stakeholders went on to say that the effectiveness depended on good practice being operated by local authorities, families being consulted with, being able to choose their own caravan and being involved in agreeing the repayment terms.

The effectiveness of the scheme was hampered by the fact that it was not available in all areas, that there was little consistency between local authority areas and that the loan amount was not enough to purchase a good quality caravan.

Three stakeholders said that the scheme had actually worsened the quality of living conditions for Travellers. The loan amount available was not sufficient to buy a quality caravan and so Travellers were forced to buy a substandard one.

“Travellers are forced to purchase substandard caravans that will need to be repaired and replaced sooner rather than later. It is in this context that Travellers are paying for a caravan that is unfit for purpose.”

One stakeholder felt that the scheme was effective *“as a useful tool to allow people the opportunity to upgrade from unsafe or unsuitable mobile accommodation or overcrowded parental homes.”* However, over time as more households have moved to *“housed”* accommodation it has become less effective.

Two stakeholders took the opportunity later in the submission to comment on how significant the Caravan Loan scheme was for the Traveller community and lamented its discontinuation.

“It has been a lifeline for struggling families and should be re-instated in the west of Ireland.”

“Because the scheme is no longer available Travellers in Offaly find it difficult to access legitimate sources of financial assistance and therefore they sometimes turn to money lenders which only exacerbates their financial debt and mental wellbeing and stress further.”

A cautionary tone was expressed by one stakeholder who suggested that the loan scheme was exacerbating situations of poverty as Travellers, living in desperate conditions, availed of loans they could not realistically afford to repay.

“Defaulting on loans was an issue but families were in desperate situations. People being offered loans where realistically were not going to be able to pay them back but at the same time wanted to improve terrible accommodation conditions so took up loans. (The) Loan scheme (was) pushing people further into poverty.”

Another stakeholder noted how valuable the Caravan Loan scheme was but stressed that it requires improved advertising and a creative approach in responding to housing needs.

3.3 What is working well with the Caravan Loan Scheme

The themes emerging from the replies to this question can be grouped into three main areas:

- The scheme helps people afford their accommodation (12)
- Provides for better quality of accommodation (8)

- Provides the type of housing that people want (6)

Affordability was a key theme emerging as a positive aspect of the Caravan Loan Scheme. Twelve stakeholders said that the loan scheme enabled Travellers afford their accommodation.

“Allow families access to affordable accommodation of their choice.”

“The caravans were affordable.”

“ITM believes that as intended (caravan loans) supported Traveller families who could not afford a mobile/caravan from their own means....”

“ It has allowed Traveller families, particularly those families living in poverty, to put a roof over their head when they would otherwise not have been able to.”

Eight stakeholders wrote that the caravan loan scheme allowed people to improve the quality of their accommodation and some went on to say that this then improved the quality of people's lives.

“A good standard of caravan which would have a positive impact on the life of the family and their health”.

“In the past it provided families with the means to purchase a decent caravan, or mobile home which was of an acceptable standard.”

“In Waterford the council insist that all caravans/mobile homes meet a minimum standard and all must have gas and electric fittings certified by the supplier prior to the loan being finalised.”

The third theme that emerged in the replies to this question was that the Caravan Loan Scheme enables people to live in the type of accommodation that they want, that is culturally appropriate and allows families to stay close together.

“Supports young families to continue to live adjacent to extended family supports, yet have independent accommodation.”

“For some Traveller families accessing the loan ensured that they could continue to live in Traveller specific accommodation.”

“Provided accommodation for Travellers who were not being suitably accommodated by Offaly Co Co.”

“They were what some people wanted.”

3.4 What is not working well with the Caravan Loan Scheme

There was more variety around the themes emerging on what wasn't working as well with the Caravan Loan Scheme.

- Operation of scheme at discretion of local authority (9)
- Loan not enough for a good quality caravan (7)

- Maintenance and provision of services to caravans on inappropriate sites (7)
- Method of selecting a caravan (6)
- Lack of transparency and information offered on terms and availability of scheme, application procedure and assessment method (4)
- Affordability (5)
- Repayment method (3)
- Not reaching people most in need (2)
- Suspension of scheme – not being used to tackle homelessness (2)

The most common area of dissatisfaction is the fact that the scheme is not run in all local authority areas and that it is run at the discretion of the individual local authority. The local authority can decide, seemingly arbitrarily to some stakeholders, to discontinue the scheme. No consultation either with local Traveller organisations or the LTACC needs to take place to stop or suspend the scheme in an area, nor does the Caravan Loan Scheme get included in the Traveller Accommodation Programme. The reason often cited for discontinuing the scheme is that loans have not been repaid, two stakeholders said that this is punishing the whole Traveller population for the issues with some.

“X Council unilaterally suspended the scheme at the height of the austerity crisis, when it was most needed”

“The issuing of loans was dependent on the opinions of the director of services i.e. some directors of services were more flexible in their interpretation of the guidelines than others.”

“Well the main concern at this stage has to be that it is in the power of local authority personnel to either allow or disallow it to be availed of.”

“Since 2012 this scheme was suspended permanently. At the time this decision was taken without Traveller consultation. When the Traveller reps questioned this decision at an LTACC meeting we were told that repayments were not being met and therefore the Co Co decided to suspend it. We pointed out that this would affect all Travellers for the actions of some.”

The next most common issue is that the loan amount available is not sufficient to pay for a decent quality caravan, especially for larger families. It was thought by some that the objective of the scheme to improve the quality of the accommodation is not being met as the caravans that are affordable are of a lower standard and have a limited life.

“After years of neglect to offer a loan of €10,000 for a caravan that won’t last longer than five years and at the end of the period will not be any better off.”

“ITM members have informed us the loan being offered in many areas was not realistic in terms of the family being able to buy a good quality caravan or mobile...”

“The availability of suitable caravans that meet the requirements of the applicants and satisfy safety regulations within the monetary limits of the loan scheme is limited.”

Maintenance and provision of services to caravans on inappropriate sites was an issue raised by seven stakeholders.

Some complained that the local authority does not help with the connecting up of the caravans to services or the ongoing maintenance of the caravan. There can be issues of amateur connections “*posing health and safety risk*”. While overcrowding on some sites can mean insufficient distances between caravans.

“While the council paid for the delivery, they didn’t organise to set up the facilities, no plumbing, no proper setting up of electrics, household had to use extension from neighbouring house. Assistance for families in setting up facilities would be very beneficial.”

One stakeholder said “*Traveller families that used the loan scheme were still living on unserviced sites*” another said that Travellers did not have access to land to place the trailer on and one stakeholder said the local authority had “*closed two of the big unofficial sites in the county*” with families “*forced to the side of the road*”.

Six stakeholders wrote that there was an issue around the purchasing of the caravan. Some local authority schemes insist that the caravan must be purchased from a registered dealer. This can drive prices up and limit options. Two stakeholders said that the individual families had no opportunity to view the caravan before it was purchased for them.

“In some areas, the family had no role in selecting the caravan they had to live in but would have to repay fully the amount paid for the caravan.”

3.5 What modifications could be made to the scheme to improve it

There was a call by seven stakeholders for the creation of a national scheme with the same common criteria regarding qualifications, repayments and application processes. This national scheme should be obligatory for all local authorities to operate. The national scheme should have clear “*national guidelines on how the scheme is to be used and implemented by all local authorities*” based on “*best practice*”. Another stakeholder suggested that the NTACC in conjunction with local Traveller representative groups could help develop the guidelines for local authorities. These guidelines would provide clear direction on the purpose of the scheme, roll out and implementation with standardised application forms.

It was suggested that the repayments should be made using the Household Budget Scheme. This ensures that repayments are deducted at source and cannot be stopped without the agreement of the local authority.

Alongside this some stakeholders suggested that repayment amounts set over the term need to be realistic. One suggestion is that loan applicants and local authorities work with National Traveller MABs when the loan is being agreed to ensure the applicant has adequate means to repay the loan.⁵⁸

⁵⁸ In the case of alternative schemes a Stakeholder suggested that the DSP should enable deductions from Household Budget for Credit Union schemes to be reintroduced.
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“A realistic repayment plan set up in consultation with the family”.

One stakeholder said the total costs of accommodation spent by Travellers should be considered. There is the differential rent to be paid for the day unit, higher utility bills (due to higher energy costs to heat a caravan) and the repayments for the loan of the caravan. Supports for utility repayments or a change to the differential rent paid for the day unit could be considered.

There were calls by stakeholders for larger caravan loans to be provided. Stakeholders thought that larger loans, with realistic repayment schedules would provide better quality caravans, that would last longer. No stakeholder provided information on what a more “realistic” amount for a quality caravan would be.

There were two related issues raised by stakeholders. The first was to do with safety on sites for new caravans. Some stakeholders suggested that the local authority could support setting up the utility connections to the caravans and ensure safe distances between caravans, while at the same time others stressed that Travellers should not be restricted from using the caravan loan scheme because of the LA regulations around distances. Two stakeholders called for more sites.

One stakeholder said that all counties should have fully serviced, transient sites available as set out in the Trespass Act 1994⁵⁹, while another suggested the provision of land and planned development with the support of CENA⁶⁰ (not in the usual halting sites). Another stakeholder thought that in their area there has been an increase in the number of Travellers returning to live with their families and that the scheme, if targeted, could help, temporarily, with overcrowding.

The bullet points below summarise the main modifications suggested by stakeholders.

- Create a common, obligatory national scheme (7)
- Repayment methods – Household Budget Scheme (5)
- Increase the loan amount to a ‘realistic’ level (5)
- Supports for more/improved/safer serviced sites to be made available (6)
- Separate scheme for those in need but without means of making repayments (4)
- Create an alternative scheme to a local authority loan scheme (4)

3.6 Current relevance of the scheme

There was overwhelming agreement that there is still a need for a Caravan Loan Scheme, with 90% (18) in agreement.

3.6.1 Demographic profile

Stakeholders were asked if the profile of those using the Caravan Loan Scheme had changed, over the years since it began. The demographic profile of those in need was typically newly formed young Traveller families with low incomes. However, this demographic has changed

⁵⁹ Criminal Justice (Public Order) Act, 1994.

⁶⁰ CENA is a Traveller led social housing body.
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and extended over the years as the crisis in housing has impacted on Travellers accessing 'housed' accommodation (This was echoed by some local authorities).

Table 3.2 provides details of the response. There were 12 (63%) stakeholders who thought that the demographic profile of those accessing and applying for the Caravan Loan Scheme had changed since the Scheme began in 2000.

Table 3.2: If the profile of those accessing Caravan Loan Scheme has changed

Has the profile changed?	No. Stakeholders	Percentage
Yes	12	63%
No	4	21%
Don't Know	3	16%
Total	19	100%

The profile typically reported would be of young newly married Traveller families choosing to live close to their extended family and with limited access to credit.

“As per the Traveller MABs review, there is a distinct socio-demographic profile of Travellers who require loans through the Caravan Loan Scheme and borrowers are predominantly young couples with young children largely dependent on a social welfare payment and living on a fixed low income. This particular cohort of borrowers do not have alternative means of legal borrowing.”

However, according to some stakeholders this profile has changed over the last few years. The economic crisis and the decline in funding for Traveller accommodation, accompanied by an increasing Traveller population and lack of housing options has led to a greater demand, or need among the wider Traveller population for the Caravan Loan Scheme. Homelessness was mentioned specifically by four stakeholders. One stakeholder suggested that the scheme, though it had originally started out as a way of improving accommodation situations had become a way “to patch up” an accommodation shortfall. Another stakeholder said:

“In the past number of years rising rent and issues of discrimination means many families particularly young families are leaving private rented accommodation often with no other accommodation secured.”

3.6.2 Relevance of the Caravan Loan Scheme

Stakeholders were asked if a Caravan Loan Scheme operated by local authorities was still relevant in the context of current Traveller accommodation policy and provision. There was an overwhelming response that a Caravan Loan Scheme is still relevant (90%). Only one stakeholder said that it was no longer relevant.

Table 3.3: Relevance of a Caravan Loan Scheme

Is a Scheme Still Relevant?	Number	Percentage
Yes	18	90%
No	1	5%
Don't Know	1	5%
Total	20	100%

The reasons that a scheme is still needed were due to:

- Current housing supply problems and lack of alternative accommodation
- Respecting cultural traditions and providing level of choice
- For some families it is the only way of accessing credit to buy a caravan and improve living conditions and replace old caravan

Within the context of its relevance two stakeholders said that it would be even more relevant if safety considerations and availability of sites were also considered.

3.7 Alternative schemes

Stakeholders were asked to provide their views on alternative models available. When answering this question, seven stakeholders referred to a past loan mechanism made available through Traveller MABS, Clann Credo., local authorities (DCC and Wicklow) and local credit unions. Stakeholders were essentially referring to the *Lough Payment Scheme* which was jointly managed by Lough Credit Union and MABS Cork to facilitate Travellers nationwide in accessing loans from their local credit union. The repayments for these loans were deducted at source via the Household Budget Scheme at An Post branches. This scheme was discontinued in 2012.⁶¹ Stakeholders were very positive in their comments about this model of loans. (further information in section 1.6)

“The Lough Payment Scheme should be reinstated as it is vital source for individuals where a LA loan is not available.”

“The supports and model developed by National Traveller MABS to access loans from credit unions is a model of good practice. There is evidence that this approach is working based on realistic loans being made available, when there is agreed realistic and fair re-payment plans and methods.”

“Partnership between National Traveller MABS and credit unions seems to be a very good model. A crucial factor in the success of the loans appears to be deducting repayments directly at source”

“Our members have expressed this approach has worked very well in terms of a realistic loan being available, agreed realistic re-payment plan, the family being in a

⁶¹ National Traveller MABS (2015) *An overview of the implementation of the Caravan Loan Initiative by Local Authorities.*

position to choose the caravan for their home therefore leading to the families' needs being met."

One stakeholder commented that the NT MABS schemes worked very well. However, this stakeholder also noted a flaw in the method of repayment whereby the debtor can opt out of the Household Budget Scheme at any time which can lead to payment arrears and loan default over time.⁶²

Two stakeholders mentioned that any new loan/funding scheme should take into account dwellings other than caravans. These dwellings, such as mobile homes or chalets, would cost more than a caravan and require a larger loan amount over a longer period.

"We should be providing Travellers with options that include Caravans, Mobile Homes...., Log Cabins, Chalets. Modern thinking needs to be brought to bear on the whole area of Traveller Accommodation..."

"A loan scheme that would allow people to purchase demountable dwellings (that depreciate less quickly than caravans) could be considered. People would require a much bigger loan over a longer period but this could prove to be more cost effective than regularly replacing caravans."

3.7.1 Alternatives – Rental Scheme

There were 11 stakeholders (65%) who thought a caravan rental scheme would be of benefit, and just one who thought it wouldn't.

Table 3.4: Potential for a Caravan Rental Scheme

Do you think there would be potential for a caravan rental scheme?	No. Stakeholders	Percentage
Yes	11	65%
No	1	6%
Don't Know	5	29%
Total	17	100%

Those stakeholders in agreement felt that a rental scheme would provide for accommodation needs and help to ensure a good standard of accommodation.

"It would be one of the ways of addressing current accommodation crisis through providing for own accommodation needs."

"Yes there should be a Robust Rental Scheme for Caravans. Traveller women and their families have the right to have access to high standard good quality caravans and accommodation".

Additionally, one stakeholder commented that a rental scheme provides a short-term option for those at risk of homelessness.

⁶² As earlier noted changes to legislation mean that opting out without permission of the LA is no longer an option.

Another stakeholder viewed the possibility of a rental scheme as an important measure of equality with others in society who have a choice of renting a local authority home.

“I believe that this is the only way that the treatment of Traveller families who wish to live in caravans can be brought to be on a par with families who wish to live in houses, i.e. to be in accordance with Equality Legislation”

Two stakeholders who answered ‘don’t know’ to this question expressed reservations about a rental scheme in light of potential issues such as insurance and liability and also where responsibility lies for any repairs and maintenance of caravans.

The only stakeholder to respond ‘no’ to the question was adamant that what the Travelling community required was long-term secure accommodation and not rental caravans:

“Travellers need the security of owning their own caravan, Travellers need long term secure accommodation and this would be a move in the wrong direction.”

3.8 Any other comments

One stakeholder stated that *“radical changes have to happen”* in respect of Traveller policy. While another stakeholder stated that what is required is a *“a root and branch approach”* that indicates a stronger level of respect for the Traveller community and that the caravan loan scheme is just one component of Traveller accommodation policy that needs to be addressed.

Two stakeholders referred to the importance of consultation with Travellers and Traveller representative groups.

Chapter 4

Stakeholder Interviews

4.1 Introduction and participation

As part of the review, the Housing Agency met with eight stakeholders to provide more depth for the review.

National Traveller MABs and Dr. Eoin O'Sullivan, Chair of the NTACC were met at the start of the review to inform its development.

The Housing Agency met with four local authorities. Wicklow was interviewed as a local authority currently operating a scheme and as it had operated an alternative to the Caravan Loan Scheme. Dublin City Council (DCC) and South Dublin County Council (SDCC) have just launched or are launching new schemes. Finally Fingal Local Authority was interviewed as it has been operating the scheme since 2000 and it's scheme is helping inform the new schemes in DCC and SDCC.

An interview was carried out with Pavee Point and Roma Centre and the Irish Traveller Movement made a subsequent more detailed submission.

The following stakeholders were consulted with:

National Traveller MABs	Nancy Power and Liz Daly
Dr. Eoin O'Sullivan (TCD)	Chair of the NTACC
Pavee Point and Roma Centre	Martin Collins and Patrick Reilly
Irish Traveller Movement	Submission from Rosemarie Maughan
Dublin City Council	Mary Hayes and Louise Lesovitch
South Dublin County Council	Hugh Hogan
Wicklow County Council	Mary Rose Walker
Fingal County Council	Ann Egan, Tom Nolan and Kate O'Reilly

4.2 Summary of findings from stakeholder interviews

There was much commonality among stakeholders. The first common theme was the view that there is still a need for a Caravan Loan Scheme. This is the reason DCC is launching a new scheme this year and SDCC did last year. One local authority said that the scheme has been very effective at helping improve the quality of accommodation for Travellers in their area and that loans for caravans are needed to help people living in poor quality accommodation and can help people to afford to purchase a new caravan.

Some stakeholders interviewed highlighted that the scheme was put in place to help improve the quality of accommodation, however some families who are the most in need may not qualify for the scheme, either because they do not meet the financial criteria or they are not tenants of an official halting site.

The scheme typically helps younger families, with children, often newly forming family units. However, some stakeholders spoke of how housing shortages have impacted on Travellers leading to a greater demand across all ages.

Nearly all agreed that the loan amount was not sufficient to buy a quality second-hand caravan and that the loan amount has not kept pace with inflation. Martin Collins of Pavee Point Traveller and Roma Centre thought that somewhere between €10,000 and €15,000 would be more appropriate, in DCC the maximum loan amount under the new scheme will probably be €8,000 and in SDCC it is €10,000. Wicklow has kept to the maximum set down by the Department's guidelines of €6,350.

Views from local authorities interviewed, and Traveller representative groups, were that the level of grant should be reviewed. A view would be that a larger grant element would help Travellers with overall affordability and help them manage the repayments over the term of the loan. There was a view that in the scale of accommodation costs the caravan loan and grant is a relatively small amount, and economically it is cost effective. At least two local authorities spoke of the cost of keeping a homeless family per week in emergency hotel accommodation.

There are also other costs that need to be taken into consideration, such as the cost of removing old caravans. Different processes are in place here. In Wicklow the cost of removing the old caravan is included in the quote from the supplier, SDCC charge the Traveller to remove the caravan (approximately €1,500) on top of the loan for the new caravan, whereas Fingal absorb the costs themselves. Patrick O'Reilly of Pavee Point Traveller and Roma Centre spoke of the high costs involved in moving a mobile home on site. Affordability is an issue, as well as the costs outlined above, there are also the rental charges for the bay and utility costs.

Alongside costs, the term of repayment needs to be considered. In general, a caravan has a shelf-life of between five and seven years. Fingal has extended the repayment term to a maximum of seven years, however most are five years, though DCC was considering repayment over a four-year term.

Non-repayment of loans and dealing with arrears was brought up by some stakeholders as an issue.⁶³ In Wicklow and Fingal where the scheme is currently operating arrears are not an issue, mainly due to the changes in legislation to the household budget. There would be a common view among stakeholders that the scheme works when repayments are made through the mechanism of the HHB. In Wicklow there is a zero-tolerance policy on non-repayment of loans. In one case the local authority took a case to court because of arrears, and loans are only written off in exceptional cases.

⁶³ Not all stakeholders mentioning arrears as an issue were able to provide detailed financial data on levels of arrears.

The issue of insuring caravans or the mortgages was a concern. One local authority official had researched insurance provision for caravans and mobile homes but was told that while insurance for holiday mobiles for those with a house is available it isn't possible to get insurance cover for all year-round residential caravans or mobile homes. Therefore, in the case of fire or death of the main applicant there is no insurance cover for the loan and the family can remain liable for it. Another local authority asks loan applicants to get insurance but hadn't realised that there might be difficulty in getting cover. This same local authority then wondered if the national Traveller representative groups could organise insurance cover. One local authority thought that the alternative caravan loan schemes run through the credit unions had insurance cover attached to the loan.

Eligibility for caravan loans is dependent on being a tenant of a local authority halting site in the Dublin area local authorities, but not in Wicklow. SDCC also said that there are not enough bays, while DCC would like records of a two-year performing rental history as a criterion. Pavee Point Traveller and Roma Centre made the point that Travellers should not be penalised by the failure of local authorities to provide sufficient halting sites to Travellers. There are also families living in trailers in gardens of houses that would also benefit from a scheme. National Traveller MABS pointed out that in new Traveller group housing schemes the space around the house is being reduced resulting in less space for caravans. One local authority spoke of the fact that the scheme is dependent on central funding from government to provide halting sites.

In Circular Letter No. TAU 1/2000 it was set out that the caravan must be purchased from a reputable supplier, registered for VAT purposes and the local authority must ensure that the caravan represents value for money. In the case of all local authorities interviewed they insist that the supplier is registered for VAT purposes. However there seems to be some difficulty ensuring value for money. There is the view that suppliers may inflate their prices if the applicant is coming through the local authority scheme. There may even be a monopoly situation in some areas. Fingal is now insisting on quotations from three suppliers from the loan applicant. Wicklow emphasised the importance of building a strong relationship between the local authority and the suppliers. Pavee Point Traveller and Roma Centre, Wicklow Local Authority and South Dublin County all mentioned there needs to be some flexibility for Travellers to be able to buy off each other, or from other sources (such as owners selling second-hand holiday mobile homes).

All stakeholders interviewed thought that a scheme operated by the credit union, with perhaps the local authority going as guarantor would be a good option. However, in Wicklow it was thought that there would still be a need for a local authority scheme to deal with extreme cases of need – those not able to build up a credit history with the credit union to qualify with them for a loan.

Advantages perceived by local authorities of credit unions offering loans would be that they would be better able to manage credit assessments, repayments and arrears. While one or two thought there can be relationship damage between Travellers and local authorities when they act as lenders.

Stakeholders had mixed views on whether a caravan rental scheme would work. None of the local authorities interviewed favoured such a scheme, whereas NT MABS and the Traveller representative groups both felt it could be another option for Traveller families.

Chapter 5

Key Findings

Level of Need

Currently 12 (39%) local authorities operate a caravan loan scheme.

Of the stakeholders 18 (90%) agreed that the caravan loan scheme was still relevant in the context of current Traveller accommodation policy and provision. Among local authorities there was a variation between rural and urban local authorities regarding the relevance of the scheme. Many of the urban local authorities reported that the scheme is still relevant, partly because of the lack of available affordable conventional housing options, which is resulting in overcrowding and a deterioration in the quality of accommodation. At the same time, local authorities in more rural areas were more likely to say there was no need or far less of a need for a scheme.

Those most in need of a caravan loan are mostly young couples with children, often forming new family units and seeking to live independently as a family for the first time but also wanting to live close to family who have a history of living in mobile accommodation. However, the profile has changed over the years, partly due to housing shortages, and those at risk of homelessness are applying, as well as a wider spread of ages in some local authorities.

Some stakeholders interviewed highlighted that the scheme was put in place to help improve the quality of accommodation, but that some families most in need may not qualify for the scheme, either because they do not meet the financial criteria or they are not tenants of an official halting site.

Take-up

There were 1,121 caravan loans reported as being provided by local authorities between the years 2000 and 2016, worth €6,275,521. The total number of loans provided ranged from a high of a total of 158 loans in 2001 to a low of 10 loans in 2012. The number of loans has been increasing since 2012 to 45 loans being provided in 2016.

Of the 1,121 loans, there were 33% which had been paid back in full, or are currently being paid back. However, caution needs to be exercised with this figure as some local authorities were unable to provide details of repayments and so it would be expected that this figure could be higher.⁶⁴ There is quite a lot of variation in the levels of arrears across local authorities nationally. In some areas, very low levels are seen, for example, in Carlow 11 of the 12 loans have been fully repaid, in Kilkenny out of a total of 31 loans there are 19 which have been repaid in full and twelve which are currently being repaid.

⁶⁴ For example, Fingal has provided 210 loans but no data on repayments was available for this study.
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In other areas, there were much higher levels of arrears. In Cork City, out of a total of 119 loans 73 are no longer being paid back, or in Donegal out of a total of 35 loans 26 were not paid back, and in Mayo just two out of 20 loans were fully paid back.

Some of the local authorities currently operating a scheme spoke about how changes in legislation to the Household Budget Scheme in January 2014 have meant that arrears are much less of an issue now.

The take-up of the scheme is determined in many areas on the number of halting sites and bays available. One local authority pointed out that availability of these is dependent on central government funding. Some local authorities operate the scheme with more flexibility than others on the location of the caravan, allowing caravans to be placed in gardens of rural housing or unofficial halting sites. Another stakeholder said that, in their area, some Travellers are living in caravans in gardens of social housing and paying rent to the local authority, but are not recognised as official local authority tenants and therefore not eligible for a caravan loan.

Effectiveness

The scheme was set-up to improve the quality and affordability of accommodation for Travellers. However, its effectiveness has been hampered by lack of availability and consistency in operation across all local authority areas.

Twelve of the 20 stakeholders thought the scheme had helped people afford their accommodation and eight felt it had improved the quality of accommodation. Though alternatively three stakeholders said the quality of accommodation had deteriorated as the loan amount was not enough to buy a good quality caravan.

There were some views expressed by local authorities on the appropriateness of caravans as suitable long-term accommodation and that the demand for this type of accommodation is declining. Whereas some stakeholders felt it was important to provide culturally appropriate accommodation.

What is working well

The main areas that were working well for local authorities, still operating a scheme, were the assessment processes which were in place and repayments being made through the household budget scheme. Some of the local authorities running successful schemes operate with some degree of flexibility.

What could be improved

For many stakeholders, it would be to put in place a national scheme with common criteria based on best practice, with less discretion for local authorities to cease operating it.

Any new or revised scheme would need to review the maximum loan set for a caravan, as nearly all (stakeholders and local authorities) agree the current amount is not sufficient. The grant amount could also be increased. At the same time the impact of any changes to the loan amount on supplier prices would need to be considered.

Affordability was also a concern. There should be consideration of the total amount that is spent on accommodation; differential rent for the bay, utility charges, loan repayments, cost of removing old caravans, connecting to utilities etc.

Stakeholders and local authorities, understandably, are concerned about safety issues on sites. Some local authorities manage and pay for the connection of new caravans to utilities, whereas others don't. Some send inspectors to check where the caravan will be situated, while at least one local authority requires loan applicants to sign a form undertaking to keep a certain distance between caravans.

Ensuring value for money in purchasing caravans is an area that could be improved on. The scheme criteria for suppliers has meant that in some areas there is almost a monopoly situation in practice. Under the scheme Travellers are unable to buy caravans from each other, or from alternative second-hand markets. One local authority called for a national tendering system to be put in place. While another is considering how Travellers might be able to purchase from each other.

There was some confusion about the grant element of the scheme. Some local authorities have never recouped it, some have not had the resources to recoup it in the past, and some are not clear on who exactly is eligible for a grant.

An improvement in how the scheme is advertised, accompanied by clear explanatory materials and a transparent system of operation of the scheme, including responsibility for the processing of the application and an appeals process would improve the scheme.

Reasons for stopping the scheme

There were 19 local authorities that had operated the scheme, but had subsequently stopped or suspended it. The reasons given by 14 were the high levels of arrears, while a further six thought there was little demand in their areas.⁶⁵ Except for two local authorities, all had stopped their schemes before changes in legislation to the Household Budget Scheme in January 2014 which meant that people using the Household Budget Scheme could no longer stop repayments without agreement from the local authority.

Alternative Schemes

Alternative schemes have been operated by DCC and Wicklow local authority with National Traveller MABS and the credit unions. Changes to legislation through the Social Welfare Act 2012, which came into effect in March 2014, have meant that these have had to be suspended as repayments through the HHB are no longer possible. This is one of the reasons that DCC is relaunching its scheme.

Twelve local authorities thought that a scheme operated by the credit unions with repayments through the HHB could be an alternative way of financing caravan loans. Some reasons that were given were that local authorities would prefer not to act as lenders, they have less ability to assess financial criteria, or follow-up on repayments. While acting as a lender can be a negative for the relationships between Travellers and the local authorities. Other stakeholders

⁶⁵ It should be noted that some LAs that said scheme stopped due to high levels of arrears were unable to supply detailed financial data on the levels of arrears.
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also thought a scheme operated by the credit unions would benefit Travellers and pointed to the previous schemes which had been in operation.

Alternative Rental Scheme

Just six local authorities thought there was a potential for a caravan rental scheme. The main concerns were to do with maintenance, insurance, destruction and lifespan of a caravan. However, rental schemes are currently operating in Wexford, Clare and DLR.

Alternative Definition

What became clear as this survey was progressing is that there needs to be clarity on the definition of what is covered by a 'Caravan' Loan Scheme. There needs to be consideration of whether mobile homes, chalets, and other forms of demountable buildings are included in the scheme.

Chapter 6

Recommendations

It was found that the scheme of loans and grants for the purchase of caravans by Travellers introduced in 2000 as a pilot scheme by the Department of Housing, Planning, Community and Local Government is, in 2017, still relevant in the context of the current Traveller accommodation policy and provision. The level of need for a scheme throughout the country varies. There are three top level recommendations the Housing Agency is making from the findings of this research:

Recommendation 1

Maintain, improve and expand the current scheme of loans and grants offered by local authorities to Travellers for the purchase of caravans (See Notes 1.1 to 1.3 below).

Recommendation 2

DHPCLG should consider the introduction of a national procurement framework for registered suppliers of caravans (See notes 1.4 and 1.5 below).

This framework has the advantage of pre-qualifying suppliers of caravans based on quality, value for money and other conditions as set out in the pre-qualifying framework. With regard to recommendations made below, additional services such as the setting up of new caravans including connection to utilities and disposal of previous caravans should also be explored in the context of this framework to ensure cost efficiencies.

Recommendation 3

Investigate reinstating the Lough Payment mechanism so that alternative caravan loan schemes can be put in place.

The Housing Agency suggests that the DHPCLG consult with the Department of Social Protection, An Post, Lough credit union, MABS and National Traveller MABS and the project manager of the micro-credit *It Makes Sense* to investigate the possibility of reinstating the Lough Payment Scheme.

This research, and previous research by NT MABS, has pointed to the success of the alternative caravan loan schemes facilitated by NT MABS, credit unions, local authorities and Clann Credo. These loan schemes provided alternatives for Travellers to access loans, while enabling local authorities support Travellers through part guaranteeing the loan. Some other advantages were relationship building between Travellers and financial institutions, the financial expertise of credit unions and NT MABS, very low levels of arrears, Travellers building a credit history and credit unions providing insurance for loans. This research has also pointed to a high level of support among local authorities for alternative schemes operated by credit unions.

Individual considerations and recommendations for improving the current scheme of loans and grants are set out in detail below. The conditions as set out in the original pilot scheme (Circular Letter No. Tau 1/2000 -see appendix B) are in italics in column 2 and then following the considerations/recommendations arising from this review on each of the conditions as set out.

No.	Circular Letter No Tau 1/2000	Recommendations
1.1	<i>A loan up to a maximum of €6,350 (£5,000) will be available for the purchase of a new/second-hand caravan.</i>	<ul style="list-style-type: none"> ➤ Increase the current loan maximum from €6,350 to an amount more appropriate to the current market value of caravans/trailers. The maximum loan amount provided by local authorities currently operating a loan scheme ranges from €5,710 to €10,000 (under special circumstances one LA has granted loans of €20,000), with an average maximum loan amount of €7,214. Local authorities thought that a modern caravan could cost anywhere from €11,420 to €20,000. However, there is a need to balance any loan amount with the ability of applicants to repay over the term of the loan. ➤ The Loan amount available to applicants could be linked to family size. ➤ Loan amount should be based on applicant's ability to repay
1.2	<i>The loan will be repaid over a period ranging from 1 - 5 years. The amount of loan sanctioned will be dependent on each applicant's ability to pay, which will be determined by the local authority. "Top up" loans will be at the discretion of the local authority, but it is envisaged that these will only be granted in exceptional circumstances;</i>	<ul style="list-style-type: none"> ➤ Maintain repayments over term of five years ➤ Allow repayment term to extend to seven years for larger families requiring more expensive caravans. ➤ Maintain 'Top up' loans at discretion of local authorities for exceptional circumstances.
1.3	<i>Applicants must satisfy the local authority that they are in need of accommodation and their circumstances are such that they cannot provide it from their own resources</i>	<ul style="list-style-type: none"> ➤ Applicants must satisfy the local authority that they are in need of accommodation and their circumstances are such that they cannot provide it from their own resources.

No.	Circular Letter No Tau 1/2000	Recommendations
1.4	<i>The caravan must be purchased from a reputable supplier registered for VAT purposes or from a supplier who has a current tax clearance certificate;</i>	<ul style="list-style-type: none"> ➤ Caravans must be purchased from a reputable supplier registered for VAT purposes or from a supplier who has a current tax clearance certificate. ➤ Reputable supplier should be part of the framework outlined below
1.5	<i>The local authority must satisfy itself that, in its opinion, the caravan to be purchased represents value for money and that it meets the needs of the Traveller household concerned, before a loan is sanctioned. The applicant must also satisfy himself/herself that the caravan to be purchased represents value for money and that it meets the needs of the household concerned;</i>	<ul style="list-style-type: none"> ➤ The Housing Agency recommends that the DHPCLG review and consider the best mechanisms for ensuring value for money. ➤ DHPCLG should consider introduction of a national procurement framework for registered suppliers of caravans. <ul style="list-style-type: none"> ○ This framework has the advantage of pre-qualifying suppliers of caravans based on quality, value for money and other conditions as set out in the pre-qualifying framework. With regard to recommendations made below, additional services such as the setting up of new caravans including connection to utilities and disposal of previous caravans should also be explored in the context of this framework to ensure cost efficiencies. ➤ Applicants or, where appropriate, the local authority to source three options for loan applicants from the framework. ➤ The local authority should manage payments to suppliers of caravan/trailer units on delivery ➤ Local authority staff should carry out inspections of caravans prior to purchase ➤ Local authority should provide regulatory standards/guidelines (fire safety/heating system etc) for caravans

No.	Circular Letter No Tau 1/2000	Recommendations
1.6	<i>The granting of assistance by the local authority shall not imply any warranty on the part of the authority in relation to the state of repair or condition of the caravan or in relation to its fitness for use as habitable accommodation.</i>	<ul style="list-style-type: none"> ➤ The Housing Agency recommends that the Local Authority is responsible for the initial connection of a new caravan to all utilities, that the local authority inspects site prior to placement to ensure adherence to safety regulations; including space between caravans and the installation of a heating system (if not already in place) when the caravan is being installed.
1.7	<i>The local authority will satisfy itself that the existing substandard caravan is disposed of, where relevant;</i>	<ul style="list-style-type: none"> ➤ Local Authorities should cover the cost of removing and disposal of existing caravan. The research has shown that some local authorities cover this and others do not. ➤ This should be included in the proposed framework outlined at 1.5 above. Firstly, it would be cost effective, professionally disposed of and also mean tenants wouldn't be responsible or incur an additional cost for the disposal of the old caravan.
1.8	<i>The local authority must satisfy itself that the caravan to be purchased will be located on a bay or other site provided by the local authority or in such other location acceptable to the authority;</i>	<ul style="list-style-type: none"> ➤ The local authority must satisfy itself that the caravan to be purchased will be located on a bay or other site provided by the local authority or in such other location acceptable to the local authority. This enables the current practice whereby local authorities act with differing degrees of flexibility, some only allow caravan loans for caravans in official halting sites, whereas others allow for unofficial sites, or loans for caravans in gardens of group or private housing.
1.9	<i>The loan will be repaid at regular intervals i.e. weekly, monthly etc.. The preferred method of repayment of the loan is through the Household budget scheme. It will remain a matter for the local authority concerned, following</i>	<ul style="list-style-type: none"> ➤ To make mandatory the preferred method of loan repayments through the Household Budget Scheme. <ul style="list-style-type: none"> ○ Examine if this will exclude any applicants in receipt of other forms of benefit.

No.	Recommendations
<p><i>Circular Letter No Tau 1/2000</i></p> <p><i>consultation with the applicant, as to alternative arrangements for repayment of the loan;</i></p>	<ul style="list-style-type: none"> ➤ The Housing Agency would recommend that the local authority maintains records of repayments and applicants are provided with an annual statement of repayments on loans plus are informed once the loan has been repaid in full. One local authority is now recording repayments on Agresso as loans as opposed to rents, which helps control budgets and recoupment.
<p>1.10 <i>The Traveller concerned must be assessed by the local authority as being in need of accommodation. Travellers normally resident outside the State will not be eligible to apply for the loan scheme;</i></p>	<ul style="list-style-type: none"> ➤ Maintain as is.
<p>1.11 <i>The normal local authority house purchase interest rate shall apply to the loan;</i></p>	<ul style="list-style-type: none"> ➤ Maintain as is.
<p>1.12 <i>The Traveller applicant will contribute at least 10% of the purchase price of the caravan;</i></p>	<ul style="list-style-type: none"> ➤ Applicants will continue to be requested to provide 10% of the purchase price of the caravan, but local authorities to exercise discretion on this provision on a case by case basis.
<p>1.13 <i>Access to future loans will be denied where an applicant defaults on the loan repayments. The local authority will take appropriate steps to recover the outstanding loan;</i></p>	<ul style="list-style-type: none"> ➤ Access to future loans issued under a revised scheme will continue to be denied where an applicant defaults on the loan repayments. The local authority will take appropriate steps to recover the outstanding loan; ➤ Applicants that may have defaulted on prior schemes should be considered on a case-by-case basis, particularly with regard to loans made prior to changes to the Household budget scheme. ➤ Consider the option of loan applicant in default and National Traveller MABS agreeing a budget plan with local authority to manage the debts.

No.	Circular Letter No Tau 1/2000	Recommendations
1.14	<i>In the event of cases of extreme hardship, the local authority may, at its discretion, extend the period for the repayment of the loan and/or reduce the amount of each repayment to assist the Travellers concerned.</i>	➤ Maintain as is.
1.15	<i>A once off grant (calculated at 10% of the purchase price of the caravan, subject to a maximum of €640 (£500)) will be off set against the cost of a caravan for a first time purchaser. This grant will be deducted from the loan amount repayable to the local authority, by the Traveller, where relevant.</i>	<ul style="list-style-type: none"> ➤ Consider expanding the grant to all applicants, not just first-time buyers ➤ Ensure local authorities are clear on procedures for recouping grant ➤ Maintain as is that the grant is not paid retrospectively

Other points for consideration

1. Provide a clear definition of what a 'caravan' is for the loan and grant scheme. Some local authorities are considering demountables, chalets, steel sheds and other forms of accommodation.
2. Encourage a more consistent, national practice and issue a circular with guidelines.
3. Ensure transparency in the operation of a scheme.
4. Provide a best practice/guidance document to local authorities on application processes, eligibility, sourcing caravans, placing on sites, management of repayments.
 - Consider setting up a working group to form the basis for the development of this guidance document.
5. Provide guidance to those local authorities who have stopped or suspended schemes to encourage the re-introduction of a scheme. Communicate the changes to Household Budget, the feedback from stakeholders and some local authorities on how the scheme has helped improved the quality of accommodation for Travellers and examples of local authorities' best practice.
6. Ensure local authorities work with MABS and National Traveller MABS to provide budgeting support services to Travellers applying for loans.
7. Explore insurance options for caravan loans.
8. Run an event for local authorities to relaunch scheme and explain changes being made and to feedback the results of the survey.
9. Communicate the research results to all stakeholders and participants in the survey.

References

Department of Health and Children (2002) *Traveller Health a National Strategy 2002-2005*. Stationary Office, Dublin. (Retrieved from <http://health.gov.ie/blog/publications/traveller-health-a-national-strategy-2002-2005/> on 8 February 2017).

Department of the Environment and Local Government (1998) *Accommodation Options for Travellers*. Stationary Office, Dublin. (Retrieved from <http://www.housing.gov.ie/housing/special-housing-needs/traveller-accommodation/accommodation-options-travellers> on 8 February 2017.)

Jones, P. (2003). *Credit Unions and Loan Guarantee Schemes: a study into the development of financial services for the over-indebted*. Liverpool: John Moores University.

MacGréil, M. (2011). *Pluralism and Diversity in Ireland. Prejudice and Related Issues in Early 21st Century Ireland*, Dublin: Columbia Press.

Nolan, B. & Maître, B. (2008) *A Social Portrait of Communities in Ireland*, Dublin: Department of Social and Family Affairs. (Retrieved from <https://www.welfare.ie/en/downloads/SocialPortraitCommunities.pdf> on 9 February 2017 on 8 February 2017).

National Traveller MABS (2014) *Discontinuation of the Lough Payment Scheme for MABS clients nationwide position paper*. (Retrieved from <https://www.ntmabs.org/publications/policy/2014/NTMABS-position-paper-on-the-discontinuation-of-the-Lough-Payment-Scheme-for-clients.pdf> on 8 February 2017)

National Traveller MABS (2015) *An overview of the implementation of the Caravan Loan Initiative by Local Authorities*. (Retrieved from <http://www.ntmabs.org/publications/development/2016/an-overview-of-the-implementation-of-the-caravan-loan-initiative-by-local-authorities-2015--with-ntmabs-response.pdf> accessed on 13 February 2017)

School of Public Health, Physiotherapy and Population Science, UCD. (2010) *All Ireland Traveller Health Study, Our Geels, Summary of Findings*, Dublin. (Retrieved from https://www.ucd.ie/t4cms/AITHS_SUMMARY.pdf on 9 February 2017).

Stamp, S (ed.) (2011) *Issues of Personal Finance within the Traveller Community: A study exploring the findings of the Local Area Development work undertaken by National Traveller MABS 2007-2011*. NT MABS.

Stamp, S. & Daly, L (2015) *A Review of National Traveller MABs supported Caravan Loan Guarantee schemes*. NT MABS. (Retrieved from

<http://www.ntmabs.org/publications/policy/2015/a-review-of-national-traveller-mabs-supported-caravan-loan-guarantee-scheme.pdf> on the 8 February 2017)

Watson, D., Kenny, O., and McGinnity, F. (2017) *A Social Portrait of Travellers in Ireland*. Research Series 56, Dublin: Economic and Social Research Institute.

Watson, D., P. Lunn, E. Quinn and H. Russell. (2011) *Multiple Disadvantage in Ireland: An Analysis of Census 2006*, Dublin: Equality Authority and Economic and Social Research Institute.

Appendix A Purpose, Scope and Terms of Reference

Review by the Housing Agency of the scheme of loans & grants for purchase of caravans by Travellers

Purpose, Scope and Terms of Reference

Purpose and Scope of the Review

The Caravan Loan Scheme commenced with effect from 1st February, 2000 by virtue of the Housing (Traveller Accommodation) Act, 1998 (Commencement) Order, SI No. 37/2000. The scheme was introduced 16 years ago on a pilot basis and has not been reviewed in the interim. Accordingly, the Housing Agency is being asked to undertake a comprehensive review of the Loan and Grant Scheme, and to submit a report to the Department with conclusions and recommendations.

The review will examine the operation of the scheme in each local authority area since its establishment, and report on whether the scheme is still a useful and relevant model in the context of current Traveller Accommodation policy and provision, and if it is viable in terms of general inflation and the increasing costs of caravans in the intervening sixteen years.

The Housing Agency will collate information from all local authorities to establish an overview of the operation of the scheme nationally and will invite comments and views from local authorities, the Irish Traveller Movement (ITM), Pavee Point, the National Traveller Women's Forum (NTWF) and National Traveller Money Advice and Budgeting Service (MABS) as part of the review. The DHPCLG⁶⁶ will make available relevant data and information to the Housing Agency and will be available to provide guidance and support, as required.

Terms of Reference

The review will address the matters set out below, making use of data, published reports, stakeholder engagement and any other means considered appropriate.

- The number and identities of local authorities that currently operate the scheme.
- Detail the cost of the scheme in each local authority, the number of units funded, and the demographic spread of those accessing the scheme.
- The financing model used by local authorities operating the loan scheme at present.
- The application process used by these local authorities and the criteria underpinning the assessment of applications for finance under the scheme. Specifically, the research should include information on the collateral required, if any, and describe the processes local authorities use to assess credit risk.
- The annual number of applications for finance under the scheme, and the proportion of overall number of applications in each local authority that are approved/rejected in each year since the scheme commenced in 2000, or for the period that the local authority operated the scheme.

⁶⁶ The Department of Housing, Planning, Community and Local Government
Review of the Caravan Loans and Grants Scheme

- Examine and comment on how effectively the scheme is meeting its intended objectives, having regard to:
 - the level of demand for the scheme from Travellers;
 - its relevance in the context of current Traveller Accommodation policy and provision;
 - its viability in light of general inflation and the increased costs of caravans in the sixteen years since its establishment.
- Provide details of local authorities that do not operate the scheme and set out their reasons for this. Ascertain if the scheme was ever operated by these authorities and, where applicable, provide details on when local authorities commenced and suspended the scheme, recording their rationale for discontinuance.
- Set out details of any difficulties with the scheme that may be identified by relevant stakeholders, including traveller representatives and local authorities, and gather views as to how they think the scheme may be improved or revised.
- Identify what alternatives, if any, are offered by local authorities not operating the scheme, and ascertain if they can identify any particular challenges experienced as a direct result of the non-operation of the scheme.
- Assess awareness among local authorities of micro-credit or other schemes operated by Credit Unions. Gather the views of local authorities on the potential of such schemes and if these, or similar alternative funding models, would be considered viable options for the caravan loan and grant scheme.
- Engage with / invite written comments from relevant stakeholders, such as local authorities, ITM, Pavee Point and the NTWF.
- Meet National Traveller MABS to discuss the review published by them in 2015 on 'Supported Caravan Loan Guarantee Schemes'.
- Comment on the relevance of the Caravan Loan and Grant Scheme having regard to the implications of demographic and cultural trends in the Traveller Community, as outlined in the 'Context of Review' in the Appendix below.
- Having regard to the above, prepare a report with conclusions and recommendations setting out whether the scheme should be retained, modified or discontinued.

Process and Delivery

The Housing Agency will undertake a comprehensive review of the Caravan Loan and Grant Scheme in operation since 1st February, 2000. The review will start in September 2016 and the Housing Agency will present a draft of the review to the Department of Housing, Planning, Community and Local Government by 7th December, 2016, with a view to submitting the final review by 21st December, 2016.

The Agency will keep the Department informed of progress on a regular basis.

Context of the Review

Section 25 of the Traveller Accommodation Act 1998 empowered local authorities to give loans for the provision of Traveller specific accommodation, i.e. loans for caravans or sites for caravans. The scheme of loans and grants for the purchase of caravans for Travellers was produced in consultation with the National Traveller Accommodation Consultative Committee (NTACC) and was established by Circular TAU1/2000 in February 2000. The scheme was initially introduced as a Pilot and was to be reviewed at the end of its first year of operation, though the proposed review never took place.

In the sixteen years since that date, the scheme has continued in effect without a review of any kind including the effects of cost-inflation, value for money to the exchequer, or its effectiveness in delivering on its core purpose of encouraging initiatives to address the needs of Traveller families who live in substandard caravans or in overcrowded conditions. The scheme is discretionary and it is understood that it has been suspended in some local authorities due to difficulties in operating it.

The Citizens Information Board (CIB) fund National Traveller Money Advice & Budgeting Service (MABS) to provide financial advice and support for Travellers in Ireland. In September 2015, National Traveller MABS produced an overview paper on the implementation of the Caravan Loan scheme by local authorities nationwide, which they submitted to the CIB. At the request of the CEO of the CIB, DECLG⁶⁷ officials met with the CIB in May 2016 and agreed to commission a comprehensive review of the Scheme. The DECLG agreed that the review would invite comments and views from the Traveller MABS and the main national Traveller representative bodies – the Irish Traveller Movement (ITM), Pavee Point and the National Traveller Women's Forum (NTWF).

At its meeting with the CIB, DECLG drew attention to the demographic trends in Traveller families (i.e. change in the number of families and also the make-up of families) which is largely due to Traveller culture and marriages at a young age. This can lead to exponential growth on halting sites where caravans are brought in by Travellers to accommodate new family formations, resulting in overcrowded conditions. These trends will have to be reflected in the review.

⁶⁷ The Department of the Environment, Community and Local Government was retitled the Department of Housing, Planning, Community and Local Government on 23 July 2016
Review of the Caravan Loans and Grants Scheme

Appendix B Circular Letter No. Tau 1/2000

7th February, 2000.

Circular Letter No. TAU 1/2000

SCHEME OF LOANS AND GRANTS FOR THE PURCHASE OF CARAVANS BY TRAVELLERS.

A Chara,

1. I am directed by the Minister for Housing & Urban Renewal to inform you that section 25 of the Housing (Traveller Accommodation) Act, 1998 was commenced with effect from 1st February, 2000 by virtue of the Housing (Traveller Accommodation) Act, 1998 (Commencement) Order, 2000. Enclosed for your information is a copy of the Order. Section 25 provides local authorities with powers to give loans for the provision of Traveller specific accommodation, i.e. loans for caravans or sites for caravans, subject to terms and conditions specified by the Minister with the consent of the Minister for Finance. This scheme which has been drawn up in consultation with the National Traveller Accommodation Consultative Committee provides for the making of loans and grants for caravan replacement.

2. Purpose of the Scheme

The purpose of the scheme is to encourage initiatives to address the needs of Traveller families who live in substandard caravans or in overcrowded conditions. The availability of funding to Traveller families to replace substandard caravans is intended to address these problems.

The new scheme of repayable loans, together with a grant element, where relevant, for caravan replacement will be a further option for Travellers to assist them to provide for their own accommodation needs and ensure that the quality of their living conditions are improved.

3. PROPOSED SCHEME OF LOANS FOR CARAVAN REPLACEMENT UNDER SECTION 25 OF THE HOUSING (TRAVELLER ACCOMMODATION) ACT, 1998.

The general conditions of this scheme are set out in Appendix I. Funding for the scheme will be met from the local authority's own resources or from finance provided by the Housing Finance Agency, in accordance with normal procedures.

In general, loans up to a maximum of **€6,350** (£5,000 (five thousand pounds)) will be available to Travellers for the purchase of a caravan, whether new or second hand. The applicant must, however, contribute at least 10% of the price of the caravan himself/herself. The caravan must be purchased from a reputable supplier, registered for VAT purposes and the local authority must ensure that the caravan represents value for money. However, it remains the responsibility of the Traveller concerned to ensure that the caravan meets his/her needs. The local authority will not be held liable for any defects in the structure or fittings of the caravan.

The applicant must be assessed as being in need of accommodation, by the local authority to whom he/she is applying for a loan, and is not in a position to provide for same, fully or partially, out of their own resources. The local authority should ensure that the applicant is in a position to meet the repayments on the loan. It is recommended that the Household Budget Scheme be used. However it remains a matter for the local authority concerned, following consultation with the applicant, as to whether alternative arrangements for repayment of the loan are acceptable.

In the event of the applicant defaulting on loan repayments, the local authority should take appropriate steps to recover the outstanding amount. Access to future loans should be denied to a borrower until an outstanding loan is repaid in full.

4. PROPOSED GRANT SCHEME FOR CARAVAN REPLACEMENT.

The conditions of this scheme are set out in Appendix II. The grant element (calculated at 10% of the purchase price of the caravan, subject to a **€640** (£500) maximum) is intended to further assist Travellers purchasing a caravan for the first time. The grant will be deducted from the loan amount repayable to the local authority. Where grant assistance only is being sought from the local

authority, payment may be made directly to the supplier or to the applicant on foot of appropriate supporting documentation. Expenditure by local authorities on the provision of grants will be recouped by the Department on receipt of certification by the appropriate officer.

5. EXISTING EMERGENCY PROVISIONS.

The existing arrangements for the recoupment of local authority costs when replacing caravans in emergency circumstances will continue in operation. However, it is expected that the level of such recoupment should be reduced in light of the scheme now being launched.

6. This scheme is being launched on a pilot basis and will be reviewed following a period of one year. The views of local authorities in operating the scheme will be sought at the end of the period of the pilot.

7. FURTHER INFORMATION

Enquires concerning this circular letter should be directed to ~~Ms. Mary Greene, (tel. (01) 888 2121) or Mr. Tony Downes, (8882101)~~

Mise, le meas,

Joe Harrington

Principal,

Traveller Accommodation Unit.

To each local authority

Circular/2000/C-L&GR

PROPOSED SCHEME OF LOANS FOR CARAVAN PURCHASE.

GENERAL CONDITIONS OF THE SCHEME.

- a loan up to a maximum of **€6,350** (£5,000) will be available for the purchase of a new / second-hand caravan;
- the loan will be repaid over a period ranging from 1 - 5 years. The amount of loan sanctioned will be dependent on each applicant's ability to pay, which will be determined by the local authority. "Top up" loans will be at the discretion of the local authority, but it is envisaged that these will only be granted in exceptional circumstances;
- applicants must satisfy the local authority that they are in need of accommodation and their circumstances are such that they cannot provide it from their own resources;
- the caravan must be purchased from a reputable supplier registered for VAT purposes or from a supplier who has a current tax clearance certificate;
- the local authority must satisfy itself that, in its opinion, the caravan to be purchased represents value for money and that it meets the needs of the Traveller household concerned, before a loan is sanctioned. The applicant must also satisfy himself/herself that the caravan to be purchased represents value for money and that it meets the needs of the household concerned;
- the granting of assistance by the local authority shall not imply any warranty on the part of the authority in relation to the state of repair or condition of the caravan or in relation to its fitness for use as habitable accommodation.
- the local authority will satisfy itself that the existing substandard caravan is disposed of, where relevant;
- the local authority must satisfy itself that the caravan to be purchased will be located on a bay or other site provided by the local authority or in such other location acceptable to the authority;

- the loan will be repaid at regular intervals i.e. weekly, monthly etc.. The preferred method of repayment of the loan is through the Household budget scheme. It will remain a matter for the local authority concerned, following consultation with the applicant, as to alternative arrangements for repayment of the loan;
- the Traveller concerned must be assessed by the local authority as being in need of accommodation. Travellers normally resident outside the State will not be eligible to apply for the loan scheme;
- the normal local authority house purchase interest rate shall apply to the loan;
- the Traveller applicant will contribute at least 10% of the purchase price of the caravan;
- access to future loans will be denied where an applicant defaults on the loan repayments. The local authority will take appropriate steps to recover the outstanding loan;
- in the event of cases of extreme hardship, the local authority may, at its discretion, extend the period for the repayment of the loan and/or reduce the amount of each repayment to assist the Travellers concerned.

APPENDIX II

PROPOSED SCHEME OF GRANTS FOR CARAVAN PURCHASE.

GENERAL CONDITIONS OF THE SCHEME.

- a once off grant (calculated at 10% of the purchase price of the caravan, subject to a maximum of **€640** (£500)) will be off set against the cost of a caravan for a first time purchaser. This grant will be deducted from the loan amount repayable to the local authority, by the Traveller, where relevant.
- the grant will not be payable retrospectively, i.e. it shall only be payable from the date of introduction of the scheme;
- in the case of a joint application for a grant, if one of the applicants has obtained the grant previously, then this will render the other applicant ineligible to claim the grant;

Appendix C Caravan Loans by Year by Local Authority

Year LA	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	Total
Carlow	0	5	5	0	0	1	0	0	0	0	0	0	0	0	1	0	0	12
Cavan	1	0	4		0	0	0	0	0	0	0	0	0	0	0	0	0	5
Clare													0	0	1	2		3
Cork City				7	6	6	12	5	17	26	9	14	6	2	1	3	5	119
Cork Co	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
DCC																		4
Donegal	15	12	2	1	1	1	3	0	0	0	0	0	0	0	0	0	0	35
DLR												1	0	0	0	0	2	3
Fingal	0	52	23	16	20	12	6	1	4	0	1	1	2	2	19	26	25	210
Galway City	1	0	0	1	1			5	0	0	0	0	0	0	0	0	0	8
Galway Co																		
Kerry	3	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
Kildare		0		1	4	2	5	4	0	2	1	2					0	21
Kilkenny																		31
Laois	0	0	1	1	6	2	0	2	0	0	0	0	0	0	0	0	0	12
Leitrim	3	0	4	3	1	1	2	0	2	2	0	3	0	0	0	0	0	21
Limerick	1	14	5	3	11	3	2	4	2	1	0	1	0	1	0	0	0	48
Longford	4	9	1	2	4	1	1	0	0	0	0	0	0	0	1	0	0	23
Louth	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Mayo	0	19	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	20
Meath	7	16	4	8	13	6	6	10	6	8	3	1	0	0	0	0	0	88
Monaghan																		7
Offaly	13	5	8	5	13	7	4	1	2	5	1	0	1	1	0	0	0	66
Roscomon																		20
Sligo																		13
SDCC																		123
Tipperary	1	3	2	3	1	2	4	3	0	4	1	1	1	5	3	1	0	35
Waterford	13	3	9	25	0	2	0	0	0	0	0	2	0	0	3	5	13	75
Westmeath	2	5	6	4	1	3	3											24
Wexford	3	13	4	3	0	0	0	0	0	0	0	0	0	0	0	0	0	23
Wicklow																		59
Total	68	158	85	83	82	50	48	35	33	48	16	26	10	11	29	37	45	1121

Note grey shaded areas no data available.

Note gold shaded LAs currently operating a Caravan Scheme.

Appendix D Description of Application Process by Local Authority

Name of Local Authority	Please could you describe the application process. (Criteria, eligibility, application form, length of process, records kept etc.)
Carlow	<p>Once the individual has expressed an interest in applying for a mobile home loan, process and the financial facts are explained, usually in a face-to-face meeting. While Housing staff can and do help the individual with the process of completing and returning the Application Form, the applicant is advised to seek independent advice from agencies such as Citizens Information or MABS in order to independently satisfy themselves that they understand the terms and conditions of the loan, that it is in their best interest, and that they can manage repayments. Once the completed documentation is received, the Application is assessed by Housing staff. A decision is made in relation to the Application by the Housing Officer and S.E.O, following the provision of any further information required by the Council Social Worker. When the Council approves the loan in principle, the applicant is advised to contact approved dealerships to identify a mobile home. The applicant is aware of the loan/grant amount and the fact that cost in excess of that amount is the liability of the applicant in advance of the loan being paid. A Council official will inspect the mobile home with the dealer and arrange mutual sureties, works and guarantees. Once the Loan has been approved, the decision is communicated to the applicant and a method of repayment is agreed, usually the Household Budget Scheme, The total loan is paid to the dealer.</p>
Clare	<p>Applicants are already on the Council's housing list so only basic information on caravan and loan repayment documentation is required.</p>
Fingal	<p>Submit financial data - social welfare payments, CC scheme payments etc to LA. Must not be paying more than 25% of income through household budget. Complete application forms Get quotes from 3 suppliers Inspector checks that site suitable. Won't put a caravan in a dangerous position. Committee decides on application Applicant signs forms: Household Budget Deduction Instruction Form, sign an agreement form that accept will make repayments of X per week, that this is the agreed amount and that this will not be reduced, and repayments made through Household Budget Scheme that they have signed up to. Sign another form for fire safety regarding minimum separation of 6 metres from the nearest trailer unit. LA organises and pays for removal of the old caravan. Takes between 1 and 3 months. Management Order signed off and is an Executive decision of the Council. Repayment term have over 7 years. Should repay loan before get a new loan but in some situations the caravan is destroyed and have to take that into consideration. Could have 2 loans being repaid at same time Day houses only on newer bays - charged rent for bay and day unit of €10 a week.</p>
Kildare	<p>Application form requests information on (i) Family Composition (ii) Date of Tenancy (iii) Income Details/Vehicles owned and book value (iv) Present accommodation details (where/size) (v) Previous Loans (vi) Any medical grounds The Local Authority follows the Department Guideline letters no. TAV1/2000 scheme of loans and grants for the purchase of caravans by travellers and general conditions of the scheme.</p>
Kilkenny	<p>Application Process, eligibility, Applicant makes contact with Local Authority's Social Worker. Applicant completes Caravan Loan Application, submits quotation from vendor for caravan, and pays application fee. Social Worker assesses application and makes recommendation. Quotation issued to Housing Engineering Section for assessment. Upon approval from Housing Engineering</p>

Name of Local Authority	Please could you describe the application process. (Criteria, eligibility, application form, length of process, records kept etc.)
	<p>and Social Worker, applicant then pays deposit. Loan repayment option letter issues from Local Authority (term of loan) with Household Budget Deduction form Once Applicant returns replies with repayment term, repayment agreement is then forwarded to applicant. This must be signed by applicant and witnessed by a third party. Before delivery of caravan is arranged, the supplier is required to meet specific conditions and a letter issues to that effect. Once the appropriate required certification is provided, and our Engineer certifies same, a requisition issues and then Purchase Order No. and delivery is arranged. When invoice for the caravan issues from supplier, An inspection is undertaken by our Engineering Staff and when recommendation for payment issues, loan funds are drawn down and loan commences. Household Budget Form is forwarded to relevant Dept. to commence deduction. Length of process (2 to 4 wks). Our Caravan Loan Application files date back to 2001.</p>
Leitrim	<p>All Applications for Social Housing Support must submit a completed Application Form for Social Housing Support and all such Applications are assessed in accordance with the above Assessment Criteria. If approved for Social Housing Support, the applicant is placed on our Housing Waiting List. Subsequently, in the event of a person making an Application for a Caravan Loan under our Caravan Loan Scheme, each application for a Caravan Loan is considered on its own merits. The amount of loan sanctioned in any instance will be dependent on the applicant's ability to pay and regard will be had to tenancy compliance and any previous repayment history.</p>
Louth	<p>Purpose - An application for caravan loan can be made by a Traveller to replace substandard caravan or to replace a caravan to alleviate overcrowding. Louth County Council will have discretion to accept loan applications in other circumstances. The applicant must be a Traveller and must be included in housing list of Louth County Council as being in need of accommodation. The applicant must have received and accepted an offer of a bay on Traveller halting site in County Louth. In the case of a married or co-habiting couple details of both must be given in the application form under applicant / joint applicant. Only first-time applicants who have not been granted caravan loan previously are eligible to apply. Own contribution - The applicant must contribute at least 10% of the price of the caravan himself / herself. Loan repayment - Loan must be paid at weekly intervals through Household Budget deduction if in receipt of social welfare payments, or by bank standing order if in receipt of other income. It will remain a matter for Louth County Council, following consultation with the applicant, as to alternative payment methods for the repayment of the loan. Council will take appropriate steps to recover any outstanding loan. Applicants, who default on the loan repayments, will be denied access to future loans. Purchase of caravan - The caravan must be purchased from a reputable supplier registered for VAT purposes. The applicant must submit quotation, on an official paper of the supplier, to Louth County Council. Condition of caravan - The applicant must submit certification from the supplier stating that the caravan to be purchased complies with all required standards and specifications for caravans. Payment of caravan - The applicant must pay a deposit on the caravan and request the Caravan supplier to send invoice with the relevant details to Louth County Council for payment. The payment will be made to the supplier by Electronic Transfer. Placement of caravan- The caravan must be placed on an official halting site in county Louth. We have recently developed a database for caravan loan applications and some changes still may be made. We have a standard application form and a</p>

Name of Local Authority	Please could you describe the application process. (Criteria, eligibility, application form, length of process, records kept etc.)
	hard file for each application will be opened. The procedure for caravan loan applications is being re-drafted.
South Dublin CC	None in place at present as the travellers are not engaging. However a form outlining the applicants and their details along with the need for the caravan and where it is being purchased has been drafted for use
Tipperary	The applicant completes the application form, assessment of need is determined, if granted, the applicant enters an agreement with the Council. Records are kept within the Housing Section IT system and the Agresso financial system.
Waterford	Eligibility - those on halting sites, or in garden of group housing schemes. Based on who is most in need. Apply and have a caravan loan group (welfare officer, AO officer, site caretaker) which meet regularly to decide, AO officer will make recommendation to the Housing Officer. Operate a running waiting list. LA clerk of works and caretaker assess condition of current caravan, check no arrears. If still owe money on a caravan but in bad condition would extend the loan into new loan. Don't ask for a deposit. Once approved then the LA pick choice of caravans. Clerk of Works and caretaker go to suppliers (have about 6) and identify 3/4 mobiles that will fit space and budget and applicant able to choose one of these. This is a new process set up in last two years. Reason because wanted to ensure value for money from supplier, wanted to ensure that applicant not choosing a caravan way out of their budget. Also need to fit onto site, some being chosen were huge, were difficult to fit on site, expensive to heat so not being properly heated leading to dampness and cold rooms. LA ensure heating system put in place and that conform to fire safety regs. Household budget scheme works very well.
Wicklow	If someone is interested in getting a loan, social worker checks that they are in receipt of a payment through An Post and that they can afford the repayments. Social worker asks where the mobile will be placed and would have a good idea whether it will be approved or not. If social worker thinks it will be approved applicant asked to get a quote from a registered dealer. Once have the documentation, it's a matter of getting contracts signed & sealed and a Director's Order in order to set it up for payment. As it involves a few departments it can take a few weeks. If think it may not be approved, social worker explains why and sees if a solution. It would usually be because there is not a suitable place to put the mobile, or it could be because the person has other repayments through Household Budget and cannot afford it. Discussion with the Director to see if there is a way around it. If not going to be approved relay this to the applicant.

Appendix E Annual Traveller Count 2015

	Local Authority	Standard Local Authority Housing			Local Authority Group			Private Houses Assisted by L.A.			Provided by Voluntary Bodies with L.A. Assistance			Local Authority Halting Sites			Accommodation Provided by Local Authority or L.A. Assistance			On Unauthorised Sites			Accommodated by or with Assistance of L.A. and on Unauthorised Sites		
		1			2			3			4			5			6			7			8		
		2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015
County Council	Carlow County Council	54	56	59	12	12	12	16	17	17	4	3	3	4	3	4	90	91	95	1	2	1	91	93	98
	Cavan County Council	51	53	56	23	22	22	0	0	0	0	0	0	0	0	0	74	75	78	4	4	6	78	79	84
	Clare County Council	47	49	54	32	34	35	24	24	24	2	4	4	15	14	17	120	125	134	3	9	10	123	134	144
	Cork County Council	143	151	150	16	19	20	7	8	9	1	1	2	16	16	18	183	195	199	29	29	31	212	224	230
	Donegal County Council	132	131	133	9	11	11	0	0	0	3	5	5	14	20	15	158	167	164	2	2	2	160	169	166
	Dun Laoghaire Rathdown County Council	37	38	37	21	23	21	0	0	0	0	0	0	36	38	38	94	99	96	2	2	5	96	101	101
	Fingal County Council	64	81	82	57	57	60	0	0	0	4	5	13	88	104	94	213	247	249	25	23	25	238	270	274
	Galway County Council	206	204	216	43	41	43	55	54	54	18	18	7	15	15	13	337	332	333	26	36	24	363	368	357
	Kerry County Council	118	94	70	0	0	0	43	43	0	3	3	16	20	14	0	184	154	86	3	0	0	187	154	86
	Kildare County Council	35	38	39	13	12	10	2	6	0	3	3	3	11	15	15	64	74	67	20	17	23	84	91	90
	Kilkenny County Council	50	52	58	8	8	8	14	14	14	3	5	5	10	13	11	85	92	96	6	2	4	91	94	100
	Laois County Council	72	69	72	9	9	9	13	13	13	5	5	6	1	1	1	100	97	101	4	10	10	104	107	111
	Leitrim County Council	10	11	14	10	11	13	1	1	0	0	0	0	6	4	5	27	27	32	0	0	0	27	27	32
	Limerick City and County Council		222	227		29	37		29	37		0	0		89	94		369	395		39	58		408	453
	Limerick County Council	212			20			28			0			22			282			22			304		
	Longford County Council	239	295	13	0	0	0	12	9	0	9	15	0	2	6	6	262	325	19	0	0	3	262	325	22
	Louth County Council	142	149	150	20	20	20	56	60	63	18	18	21	2	2	2	238	249	256	6	7	18	244	256	274
	Mayo County Council	93	88	92	13	14	14	43	46	46	24	25	27	4	3	6	177	176	185	17	28	34	194	204	219
	Meath County Council	118	120	130	22	22	22	0	0	0	15	15	15	24	24	32	179	181	199	10	14	14	189	195	213
	Monaghan County Council	82	87	93	0	0	0	24	24	24	0	0	1	9	13	7	115	124	125	1	1	3	116	125	128
	North Tipperary County Council	105			15			5			6			13			144			15			159		

	Local Authority	Standard Local Authority Housing			Local Authority Group			Private Houses Assisted by L.A.			Provided by Voluntary Bodies with L.A. Assistance			Local Authority Halting Sites			Accommodation Provided by Local Authority or L.A. Assistance			On Unauthorised Sites			Accommodated by or with Assistance of L.A. and on Unauthorised Sites		
		1			2			3			4			5			6			7			8		
		2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015	2013	2014	2015
County Council	Offaly County Council	83	98	92	4	4	4	21	23	23	6	10	17	35	33	38	149	168	174	36	37	37	185	205	211
	Roscommon County Council	18	18	19	17	15	18	4	4	4	0	0	0	9	9	8	48	46	49	0	0	0	48	46	49
	Sligo County Council	31	36	34	0	0	0	0	0	0	2	2	5	25	25	16	58	63	55	8	8	12	66	71	67
	South Dublin County Council	54	53	53	102	99	98	10	10	10	8	8	14	121	125	128	295	295	303	0	0	2	295	295	305
	South Tipperary County Council	54			17			6			2			10			89			3			92		
	Tipperary County Council		168	180		31	32		11	12		9	9		28	30		247	263		22	28		269	291
	Waterford City and County Council		69	72		6	6		15	15		8	9		22	29		120	131		5	0		125	131
	Waterford County Council	9			0			0			4			4			17			0			17		
	Westmeath County Council	119	128	132	6	6	6	29	29	29	0	1	1	38	38	38	192	202	206	0	0	0	192	202	206
	Wexford County Council	142	146	148	47	47	46	28	29	31	7	7	8	9	10	11	233	239	244	56	56	55	289	295	299
	Wicklow County Council	114	116	119	15	15	15	4	2	3	0	0	0	32	31	33	165	164	170	2	8	14	167	172	184
	Total	2,634	2,820	2,594	551	567	582	445	471	428	147	170	191	595	715	709	4,372	4,743	4,504	301	361	419	4,673	5,104	4,923
City Council	Cork City Council	170	171	178	5	5	17	21	21	21	0	0	0	67	75	76	263	272	292	4	7	8	267	279	300
	Dublin City Council	219	229	248	138	140	143	1	1	1	7	9	8	101	90	76	466	469	476	44	72	87	510	541	563
	Galway City Council	195	198	209	20	20	20	11	11	0	4	4	0	59	65	74	289	298	303	1	5	20	290	303	323
	Limerick City Council	3			9			1			0			67			80			11			91		
	Waterford City Council	58			5			15			4			22			104			0			104		
	Total	645	598	635	177	165	180	49	33	22	15	13	8	316	230	226	1,202	1,039	1,071	60	84	115	1,262	1,123	1,186
Total		3,279	3,418	3,229	728	732	762	494	504	450	162	183	199	911	945	935	5,574	5,782	5,575	361	445	534	5,935	6,227	6,109