



# **An Comhchoiste um Shaincheisteanna Ríthábhachtacha a théann i gcion ar an Lucht Siúil**

Tuarascáil maidir leis an Scéim Iasachta Carbhán

30 Deireadh Fómhair 2024

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## **Joint Committee on Key Issues affecting the Traveller Community**

Report on the Trailer Loan Scheme

30 October 2024



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## Related information

### Publications

All publications for this committee are available on the [Oireachtas website](#).

### Committee debates

Transcripts of Committee debates can be found on the [Committee debates page](#).

### Committee videos

Footage of Committee proceedings can be found on the [Committee videos page](#).

### Contact details

The contact details for the Committee can be found on the [Committee page](#).

### Terms of reference

Read the [terms of reference](#) for the Committee.

## Committee Membership

Cathaoirleach

[Senator Eileen Flynn](#), Independent

Leas-Cathaoirleach

[Éamon Ó Cuív TD](#), Fianna Fáil

Members

[Pat Buckley TD](#), Sinn Féin

[Ciarán Cannon TD](#), Fine Gael

[Joan Collins TD](#), Independents 4 Change

[Patrick Costello TD](#), Green Party

[Peter Fitzpatrick TD](#), Independent

[Paul McAuliffe TD](#), Fianna Fáil

[Denise Mitchell TD](#), Sinn Féin

[David Stanton TD](#), Fine Gael

[Senator Paul Gavan](#), Sinn Féin

[Senator Malachai O'Hara](#), Green Party

[Senator Joe O'Reilly](#), Fine Gael

[Senator Ned O'Sullivan](#), Fianna Fáil

## Foreword

Good, safe and warm accommodation forms the basis of a healthy and happy life. Throughout the Committee's examination of this topic, we have become even more convinced that those who cannot access decent accommodation experience stark consequences in respect of their health, their ability to participate in education or work and their experience of the justice system. Members of the Traveller community – whether they choose to reside in culturally appropriate accommodation or standard accommodation – are entitled to an energy-efficient home of a good standard.

The Committee has found that the Caravan Loan Scheme, as it is currently operated, falls well short of this goal. We have seen evidence that shows that the vast majority of trailers obtained under this Scheme are second-hand. The loans provided under the Scheme are insufficient and, as a result, trailers do not meet the standards of energy efficiency or quality to ensure that the families who live in them can heat their homes and live comfortable lives.

For this reason, the Committee calls for an increase to the loan amount available under the scheme to allow them to purchase a trailer of a minimum BS3632 standard. In addition, the Committee reiterates the call of the previous Committee that an audit of all trailers be undertaken, and all defective units replaced with new ones of a minimum BS3632 standard.

The Committee would like to thank the witnesses who attended public meetings of the Committee and informed our work. In particular, we would like to thank those members of the Traveller community and those advocates who work to advance the rights of Travellers.

On behalf of the Committee, I would also like to commend the Traveller community who continue to demonstrate resilience in the face of deprivation and poor living conditions on sites.



Senator Eileen Flynn, Cathaoirleach

30 October 2024

## 1. Language

- 1.1 The Traveller community generally refers to vehicles which are equipped for living in as 'trailers' rather than 'caravans'. Therefore, the preferred language of the Traveller community will be utilised throughout this report. However, the 'Caravan Loan Scheme' will be referred to by the title which is currently in use by the Department of Housing, Local Government and Heritage for the purposes of clarity.
- 1.2 The Committee recommends that the preferred language of Travellers should be adopted by the Department of Housing, Local Government and Heritage in its operation of this scheme. The Committee calls for the Caravan Loan Scheme to be renamed the 'Trailer Loan Scheme'.
- 1.3 Moreover, the Committee suggests that all future schemes regarding the provision of trailers to the Traveller community should also use the language 'trailer' rather than 'caravan'.

## 2. Introduction

- 2.1 The Joint Committee on Key Issues affecting the Traveller Community was formally established in May 2023 and held its inaugural meeting in June 2023. This Committee follows on from a previous iteration of the Joint Committee on Key Issues affecting the Traveller Community, which laid its final report before both 30 November 2021 and was dissolved on the same date.
- 2.2 The Orders of Reference of the re-established Committee make provision for it to consider policy matters which were addressed by the previous Committee in the course of its work. In addition, the Orders of Reference specify that the Committee may consider access to justice, mental health and employment opportunities for the Traveller community.
- 2.3 The Committee agreed that accommodation for the Traveller community is a priority issue. Accommodation is one of many areas in which the Traveller community has been - and continues to be - underserved by the State. The Traveller community face barriers in a range of other areas, including education, employment, health and justice. While each of these elements is inextricably linked with the others, the Committee believes that accommodation is precedent above all else, as it forms the bedrock of a stable life and social participation.
- 2.4 For this reason, updates were sought from the Department of Housing, Local Government and Heritage (DHLGH) as well as the County and City Management Association (CCMA) on the progress they have made in implementing the relevant recommendations featured in the final report of the previous Committee. This report includes 18 recommendations pertaining to accommodation policy.
- 2.5 Throughout the Committee's engagement with the DHLGH and the CCMA, as well as with other relevant stakeholders, the operation of the Caravan Loan Scheme was identified as a key matter of concern.
- 2.6 Several issues regarding the operation of the scheme were identified, including: the limited number of loans available:
- the competitive nature of the scheme within the context of the crisis in Traveller accommodation;
  - the quality of trailers available at the scheme's maximum loan amount



- energy inefficiency and;
- the role of debt in further aggravating the issue of poverty among the Traveller community.

2.7 In light of these issues, the Committee undertook comprehensive examination and stakeholder engagement in respect of the Caravan Loan Scheme.

### 3. Recommendations

- 3.1 The Committee endorses the recommendations of the previous Joint Committee on Key Issues affecting the Traveller Community that all substandard trailers on local authority sites be audited – taking account of the trailer’s condition and suitability for family size – and that all substandard trailers be replaced by new trailers of a high standard.
- 3.2 The Committee recommends that the process of audit would commence within three months of this report being published and the scheme itself would commence roll out within six months of the publication of this report.
- 3.3 The Committee recommends that a Trailer Rental Scheme – informed by the proposal of National Traveller MABS – be provided on a permanent basis.
- 3.4 The Committee recommends that the Caravan Loan Scheme be renamed the Trailer Loan Scheme and that the maximum loan amount provided under the scheme is increased to ensure that brand new, high-quality and energy efficient units can be purchased.
- 3.5 The Committee recommends that funding is provided to all local authorities to provide for a Trailer Rental Scheme to run alongside a Trailer Loan Scheme and that both options are available to the Traveller community.
- 3.6 The Committee recommends that other forms of permanent housing such as chalets or modular homes be included in the terms of a proposed Trailer Rental Scheme and an updated Trailer Loan Scheme.
- 3.7 The Committee recommends that all trailers over seven years old would automatically be replaced as this is considered the lifespan of such trailers for 365 day of the year occupation.
- 3.8 The Committee recommends that costings for trailers would include all ancillary costs including installation, fire safe steps and ramps, civil works and fire safety and utility connection costs.
- 3.9 The Committee recommends that no deposit would be required from the recipient (at present €500 is required up front).
- 3.10 The Committee recommends that in the event of an applicant being in arrears in their rent that they would be eligible for the scheme as long as they entered into an arrangement to pay back the arrears instalments to the Local Authority.

- 3.11 The Committee recommends that total loan repayments on the scheme would be no greater than the Differential Rent for such a person less any rent being paid for the use of the site and other units on the site.
- 3.12 The Committee recommends that all trailers should meet standard BS3632.

## 4. Culturally Appropriate Accommodation

- 4.1 Travellers live in a variety of different forms of accommodation. Many Travellers live in Traveller-specific or culturally appropriate accommodation while many Travellers also live in standard accommodation. Traveller accommodation refers to any form of accommodation in which Travellers reside. Comparatively, Traveller-specific accommodation refers to accommodation which is culturally appropriate to the needs and the traditions of Travellers such as nomadism, living with extended family and keeping horses.
- 4.2 Camps, halting sites and group housing schemes are regarded as forms of culturally appropriate accommodation by many Travellers, though accommodation preferences differ between individuals.
- 4.3 Traveller accommodation statistics gathered by the Department of Housing, Local Government and Heritage show that 989 Travellers were living on local authority halting sites in 2022, with a further 654 living on unauthorised sites.<sup>1</sup>
- 4.4 According to the 2022 Census, 2286 Travellers live in “caravans, mobile homes or other temporary accommodation”.<sup>2</sup> This represents 8% of the population who identified themselves as Travellers in the 2022 Census. This amounts to a decline in the percentage of Travellers living in trailers from 12% which was recorded in the previous Census of 2016. This is reflective of an overall trend of some Travellers living in standard accommodation – particularly private rented accommodation – as a result of the lack of available culturally appropriate accommodation.

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<sup>1</sup> [Traveller accommodation statistics. Department of Housing, Local Government and Heritage \(2022\).](#)

<sup>2</sup> [Census 2022 Profile 5 – Diversity, Migration, Ethnicity, Irish Travellers & Religion. Central Statistics Office \(2022\).](#)

## 5. Statutory Basis of the Caravan Loan Scheme

5.1 The Caravan Loan Scheme operates under Section 25 of the Housing (Traveller Accommodation) Act 1998 (as amended).<sup>3</sup>

Housing (Traveller Accommodation) Act 1998	(1) Subject to subsection (2), a housing authority may make a loan for the—	(a) acquisition or repair of a caravan within the meaning of section 13 of the Act of 1988 (as amended by section 29), or
25. —		(b) acquisition of land for the purpose of providing a site and any construction works required for such purpose.
	(2) The Minister shall, with the consent of the Minister for Finance, specify terms and conditions for loans made under subsection (1)	
	(3) Subsections (2) to (14) of section 11 of the Act of 1992 shall apply, to such extent as may be appropriate and with any necessary modifications, to a loan made under this section.	

5.2 The legislation does not refer explicitly to the provision of other schemes – such as a Trailer Rental Scheme – however it does not prohibit the provision of such schemes, nor would the provision of such a scheme require an amendment to existing legislation.

<sup>3</sup> <https://revisedacts.lawreform.ie/eli/1998/act/33/section/25/revised/en/html>

## 6. Terms and Operation of the Caravan Loan Scheme

- 6.1 The first Caravan Loan Scheme was launched as a pilot project by the Department of Environment in 2000 to assist families and individuals in purchasing or updating a mobile home or trailer which functions as their primary residence.<sup>4</sup><sup>5</sup> The Scheme was designed to address overcrowding and poor living conditions and to provide financial services to Travellers.<sup>6</sup>
- 6.2 The Scheme originally provided for local authorities to grant a loan up to a maximum of £5,000 (converted to €6,350 with the introduction of the euro in 2002) to purchase a trailer. The terms stipulate that:
- the loan should be paid back within five years
  - the applicant must be in need of a trailer and unable to purchase one with their own resources
  - the trailer must be purchased from a registered supplier
  - the trailer must be located in a site provided by the local authority or in another location permitted by the local 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 trailers.
- 6.3 According to a report by Community Law & Mediation, the maximum loan amount has varied by local authority, citing research from 2017 by the Housing Agency which states that the maximum loan amount ranges from €5,710 to €10,000, with an average maximum loan amount of €7,214.<sup>7</sup> The maximum loan amount was increased to €40,000 in 2022.
- 6.4 In 2021, a pilot Caravan Loan Scheme was launched, offering 12 loans in Cork City. The 2021 pilot scheme was continued in 2022 and these schemes form the basis of the on-going Pilot Caravan Loan Scheme 2023.
- 6.5 Details of the provision of the Caravan Loan Scheme for 2023 are set out in Circular 21/23, which was issued by the Department of Housing, Local Government and Heritage on 4 July 2023.

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<sup>4</sup> [The Legal Implications and Lived Experiences of the Caravan Loan Scheme. Community Law & Mediation \(2020\).](#)

<sup>5</sup> [An overview of the Implementation of the Caravan Loan Initiative by Local Authorities. NT MABS \(2015\)](#)

<sup>6</sup> [The Legal Implications and Lived Experiences of the Caravan Loan Scheme. Community Law & Mediation \(2020\).](#)

<sup>7</sup> *ibid*

6.6 The Circular concerns the continuation of the nationwide pilot Caravan Loan Scheme which operated from July 2022 to December 2022.

6.7 The 2023 iteration of the scheme provides for 80 trailers or a total allocation of €3.2m in loans, whichever is the lesser. Each local authority was issued with an allocation for trailers detailed in the table below.

Local Authority	Allocation of trailers in 2023
Carlow	1
Cavan	0
Clare	2
Cork City	5
Cork County	3
Donegal	1
Dublin City	8
Dún Laoghaire-Rathdown	3
Fingal	7
Galway City	3
Galway County	1
Kerry	1
Kildare	1
Kilkenny	1
Laois	1
Leitrim	0
Limerick City & County	11

Longford	1
Louth	1
Mayo	2
Meath	2
Monaghan	0
Offaly	3
Roscommon	3
Sligo	2
South Dublin	6
Tipperary	3
Waterford City & County	2
Westmeath	2
Wexford	4
Wicklow	2
<b>Total</b>	<b>80</b>

6.8 As in previous years, the loan granted to awardees must be repaid in weekly instalments.

6.9 Circular 21/23 also details amendments which were made to the 2023 iteration of the scheme in light of feedback from local authorities and national Traveller organisations regarding the 2022 scheme.

6.10 Changes which were made to the scheme include the following:

- A deposit of €500 is required to participate in the scheme. In the 2022 scheme, 5% of the value of the trailer was paid by the applicant.



- Local authorities are obliged to establish an appeals process for unsuccessful applicants.
- Local authorities are obliged to monitor repayments.
- Local authorities must commit to ensuring that the minimum repayment of €20 per week is met.

## 7. Reviews of the Caravan Loan Scheme

- 7.1 A Review of the Scheme of Loans and Grants for the Purchase of Caravans by Travellers<sup>8</sup> was conducted by the Housing Agency in 2017. The authors engaged with the 31 local authorities and with 20 other stakeholders to inform the review.
- 7.2 At the time the review was undertaken, 19 local authorities had stopped or suspended the Caravan Loan Scheme and the remaining 12 were operating the scheme. The inconsistent approach taken by different local authorities to the scheme's provision and implementation was highlighted as a key issue for Traveller representatives.
- 7.3 Additionally, the review found that maximum loan amounts were too low and that there were concerns around the affordability of the scheme. The review also noted concerns that the price of trailers would be inflated should the maximum grant amount be increased.
- 7.4 Since the publication of this review, the Caravan Loan Scheme has been altered, including increases to the maximum grant amount.
- 7.5 In addition, a separate review of the Caravan Loan Scheme titled [The Legal Implications and Lived Experiences of the Caravan Loan Scheme](#) was undertaken by Community Law & Mediation over the period of 2018 and 2019. This review was published in 2020.
- 7.6 The report is based on consultation with Traveller organisations as well as focus groups with healthcare providers to the Traveller community. Taking a legal perspective, the report also considers how the Caravan Loan Scheme is operated in light of the State's human rights obligations. The purpose of the report is to scrutinise the effectiveness of the Caravan Loan Scheme in meeting the State's legal obligations to ensure that the Traveller community may access a high standard of culturally appropriate accommodation.
- 7.7 Among the report's key findings are:
- Substandard trailer conditions and inconsistent loan amounts
  - Barriers to amenities and 'doubling up'<sup>9</sup>
  - Lack of availability and awareness of the Caravan Loan Scheme

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<sup>8</sup> Review of the Scheme of Loans and Grants for the Purchase of Caravans by Travellers. The Housing Agency (2017).

<sup>9</sup> 'Doubling up' refers to two families who officially share an address and therefore may only access fuel allowance for a single family.

- Exclusion of the Traveller community from decision-making
- Basic facilities missing from trailers purchased through the scheme

7.8 Section 32 of the Irish Human Rights and Equality 2014 Act gives the Irish Human Rights and Equality Commission (IHREC) statutory powers to undertake equality reviews and to prepare Equality Action Plans.

7.9 IHREC states that:

“An Equality Review or Equality Action Plan may relate to equality of opportunity generally, or a particular aspect of discrimination, within an organisation or organisations (public or private sector). They are requested to carry out Equality Reviews and the focus of the reviews are a matter within the discretion of the Commission, having regard to its areas of focused work and its strategic priorities.

In non-legal terms Equality Reviews are a means for an organisation to benchmark, or audit, its practices against its obligations under equality law in order to assess whether the organisation, as a service provider, is fulfilling its statutory obligations to ensure equality of opportunity, or an absence of discrimination.”

7.10 In 2019, IHREC invited all 31 local authorities in the State to undertake a review of their provision of Traveller accommodation. A report on each equality review was published on 14 July 2021.

7.11 In its overview, IHREC cites the following issues as key overarching concerns:

- Underspend in draw-down of allocated funding
- Evidence of poor information gathering to inform decision-making
- Identifying Travellers’ true accommodation preference.

7.12 IHREC also notes in its overview that “Twenty-two local authorities make no reference to the Caravan Loan Scheme”.

7.13 Further to this work, IHREC invited seven local authorities to produce Equality Action Plans to identify actions to ensure the implementation of the findings of the relevant Equality Review.

## 8. Energy Efficiency

- 8.1 In 2022, the Department of the Environment, Climate and Communications published the Energy Poverty Action Plan. Further to this, in November 2023, the Department of the Environment, Climate and Communications published the Energy Poverty Action Plan: Stakeholder Forum Report.<sup>10</sup>
- 8.2 The Action Plan includes trailers under its list of “hard to treat” homes as regards energy upgrades and cites the provision of the Caravan Loan Scheme as a relevant action to improve energy efficiency in trailers. However, there is limited evidence to suggest that, thus far, the Caravan Loan Scheme has considerably improved energy efficiency in trailers. Data provided to the Committee by the Department of Housing, Local Government and Heritage demonstrates that the majority of units purchased under the Caravan Loan Scheme are second-hand. In 2022, 77 loans were provided – 74 of which were second-hand and three of which were new.
- 8.3 The Action Plan notes that the Electricity Costs Emergency Benefit Payment notes that the Department learned that:
- “Traveller families who use Local Authority accommodation where there is a single MPRN<sup>11</sup> registered to the Local Authority, did not receive this payment. DECC<sup>12</sup> has worked with Local Authorities to ensure that the payments under the first and second schemes are made available to this group.”
- 8.4 It is unclear if this payment was subsequently made available to these families.
- 8.5 NT MABS state that “Under existing systems, families cannot afford to purchase good quality energy efficient homes”, adding that “Homes purchased either by families from their own means or through the existing loan schemes are not energy efficient and lead to higher energy bills.”<sup>13</sup> Another study by NT MABS found that 77% of Travellers living in trailers were in energy poverty, spending 26% of their income on energy costs. They argue that the provision of a rental

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<sup>10</sup> [Energy Poverty Action Plan. The Department of the Environment, Climate and Communications. 2022.](#)

<sup>11</sup> Meter Point Reference Number

<sup>12</sup> The Department of the Environment, Climate and Communications

<sup>13</sup> [Proposal for National Caravan Rental Scheme. NT MABS \(2020\)](#)

scheme would allow for Travellers to live in higher quality energy efficient trailers.

## 9. Standard and Durability of Trailers

- 9.1 As stated previously, in 2022, 77 loans were provided across the State – 74 of which were second-hand and three of which were new. Catherine Fahy of Galway County Council told the Committee that second-hand trailers have a lifespan of eight to ten years. The maximum loan amount offered at present is €40,000. Denise Doyle of Dublin City Council told the Committee that this amount is only sufficient for a second-hand unit. She also stated that a second-hand trailer has a lifespan of five to eight years. Likewise, Brian Geaney of Cork City Council told the Committee that €40,000 is insufficient for the purposes of purchasing a first-hand trailer of suitable size, quality and durability.
- 9.2 National Traveller MABS echoed this sentiment, telling the Committee that the purchasing power of the loan amount is insufficient to purchase a trailer of adequate standard at current retail prices. Denise Collins of National Traveller MABS stated that trailers should meet the BS3632<sup>14</sup> standard – the standard referenced in the DHLGH Circular 46/2016. She added, however, that research undertaken by her organisation in conjunction with Atlantic Technology University Sligo found that the cost of a new residential-standard trailer for a two-person household begins at €60,000, exclusive of delivery, installation and disposal costs.
- 9.3 John O’Sullivan of Cork Traveller Visibility Group (Cork TVG) told the Committee that trailers are not suited to be used all-year round and suggested that DHLGH should consider providing modular homes on sites. He told the Committee that the average price of a modular home for the purpose of a development in Cork was approximately €165,000 and that they have a lifespan of around 50 years. Brian Geaney of Cork City Council also suggested that modular housing to be an option under the Caravan Loan Scheme.
- 9.4 At a public meeting on 14 December 2023, Margaret Casey told the Committee that Cena – along with other Approved Housing Bodies (AHBs) – is considering the use of modular homes, with a lifespan of 70 years or more, to address the crisis in accommodation for the Traveller community. She added that they are

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<sup>14</sup> BS3632:2015 is the most recent minimum standard specification for the manufacture of trailers issued by the British Standards Institution

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working with a modular homes company to design culturally appropriate homes to meet the needs of the Traveller community. Likewise, Denise Doyle stated that Dublin City Council is liaising with its architects' team to design culturally appropriate modular housing units.

- 9.5 Elizabeth Fanning of Galway City Council told the Committee that “chalet-type” homes are being installed in the Circular Road development within the council’s functional area and endorsed this style of accommodation along with modular housing.
- 9.6 Bernard Joyce of Irish Traveller Movement told the Committee that the vast majority of Travellers cannot afford modular homes or trailers of a high standard and that the retail price of the highest standard long-term quality mobile homes should inform the review of culturally appropriate Traveller accommodation undertaken by the DHLGH. He also highlighted the importance of acting quickly while also offering choice as to which type of home members of the Traveller community wish to live in as well as the importance of ensuring that homes of any type are new and of a high standard.
- 9.7 AnnMarie Farrelly of the County and City Management Association told the Committee that modular homes typically cost between €120,000 and €130,000 and confirmed that accommodation of this type has been requested by some families. She stated that such accommodation cannot be provided through the Caravan Loan Scheme and that the Upgrade Capital Investment Programme should be the means through which accommodation of this type should be made available on sites. She also stated that modular homes may form part of the solution to the crisis in accommodation for the Traveller community.
- 9.8 Caroline Timmons of DHLGH stated that the Department would consider the provision of modular housing for the Traveller community if there is demand for it, particularly as it may prove more sustainable for families in the longer term.
- 9.9 Brigid Carmody of Cork TVG also highlighted the delays in utility connection and maintenance works for trailers. She told the Committee:

“We work with some families who do not have their mobile homes connected to water or heating. One particular family has a mobile home that has not been connected in six to eight months. If a family takes out a €40,000 loan

through the caravan loan scheme and it is not connected up to heating, and in this weather the damp will be setting in, the caravans do not last the length of the loan because they start rotting before they are paid off. People are waiting six to eight months to get heating and water into a mobile home. There seem to be very long delays getting plumbers and electricians out to connect caravans and that is a real concern.”



## 10. Loan Amount and Ancillary Expenditure

- 10.1 Representatives of Dublin City Council and Galway County Council stated that there are a number of ancillary costs associated with the provision of a trailer. These costs are not reckonable as a part of the Caravan Loan Scheme. Among these expenses are:
- Installation fees
  - Installation of fire-safe steps or ramps
  - Fire safety and civil works
  - Utility connection costs.
- 10.2 Denise Doyle told the Committee that Dublin City Council “would welcome a full review of the current loan scheme and an extension of the amount available.” AnnMarie Farrelly of the County and City Management Association stated that fire-safety works and civil works can cost up to €10,000 per trailer and echoed calls for a review of the Scheme. In addition, she suggested that a budget should be provided by the Traveller Accommodation Unit of DHLGH to fund repairs to trailers.
- 10.3 Caroline Timmons of DHLGH told the Committee that the average cost of installation nationally was €6,911 per trailer in 2022. She also told the Committee that the average purchase cost was €33,000 in the same year. She stated to the Committee that the loan amount was increased from €30,000 to €40,000 in 2023 and that the Department would be open to re-examining the value of the loan if evidence from the next review suggests that it is not sufficient.
- 10.4 Bridget Kelly of the National Traveller Women’s Forum (NTWF) told the Committee that €40,000 is insufficient for the purchase of a standard trailer. She added that the cost of trailers has increased and that some suppliers increase the price of trailers when the Caravan Loan Scheme is advertised.
- 10.5 However, in light of challenges associated with the current system of loans at €40,000 – including debt and repayment arrears – an increased loan amount may aggravate these issues if the recipient is solely responsible for their repayment.

## **11. Demand for the Caravan Loan Scheme**

11.1 Mary Heavey of Community Law & Mediation told the Committee that awareness of the Caravan Loan Scheme is poor and, as a result, demand for the Scheme is not reflective of actual need. She stated that very few of the clients who attend Community Law & Mediation clinics are aware of the Caravan Loan Scheme, adding that this has been caused by the sporadic and inconsistent application of the Scheme across local authorities. Moreover, Ms Heavey told the Committee that local authorities undertake little advertisement of the Scheme and that little information relating to the Scheme is available online.

11.2 Many stakeholders from across the State told the Committee that the Caravan Loan Scheme – as presently operated – does not meet a fraction of its demand. As mentioned previously, the pilot Caravan Loan Scheme provided for 77 caravans in 2022 and 80 caravans in 2023. John O’Sullivan of Cork TVG told the Committee that since the Scheme was launched, 37 applications have been made in the functional area of Cork City Council, while only five loans have been allocated. He added that it will take seven years to provide a loan to the remaining 32 applicants, not accounting for new applicants who will apply for the loan in future. Mr O’Sullivan told the Committee that the distribution of loans across local authority areas was based upon Traveller population in each functional area rather than demand or need.

11.3 Mr O’Sullivan told the Committee that:

“Travellers should not be asked to take out a €40,000 loan for a temporary accommodation solution while they await long-term accommodation. They are the only ethnic group being asked to take out a loan for a social housing option. We feel this practice is discriminatory and not fit for purpose.”

11.4 Bridget Kelly of the NTWF told the Committee that the Caravan Loan Scheme “discriminated against Travellers in its design”, adding:

“People are being asked to take out loans, who are already on local authority waiting lists. A rental scheme could have been a better option, not least as it allows for a higher specification of unit and longer term value, centralised

purchase by the local authority, and funded by the Department, with a broader scope for Travellers.”

11.5 She added that – arising from consultation with the membership of her organisation – the NTWF calls for an independent review of the Caravan Loan Scheme.

11.6 Breda O’Donoghue of Cork TVG stated at a public meeting of the Committee:

“We are caught between a rock and a hard place in that we do not want the scheme. We think it is discriminating against families. There are families in dire need, however. Let us be honest: nobody wants to take out a €40,000 loan to accommodate themselves. I believe it should be scrapped and we should look at a rental scheme. That would be my first impression of it. It is not working and there are not enough loans to meet the need anyway even if it was working. Therefore, rather than a review, I would like to see it just scrapped and for us to relook at another option.”

11.7 Margaret Casey of Cena told the Committee “I believe that Travellers should not seek trailer loans and should rent them like settled people rent council homes” but added that “It is vital that we have a trailer loan scheme for crises happening in the community on a short-term basis” and that “It should never be abolished.”

11.8 Likewise, Martin Collins of Pavee Point told the Committee that an improved Trailer Loan Scheme should be retained and should run in parallel with a Trailer Rental Scheme.

## 12. The Case for a Trailer Rental Scheme

- 12.1 Under Chapter 3 of the [Housing \(Miscellaneous Provisions\) Act 2009](#) (as amended) housing authorities – which includes local authorities – may provide, facilitate or manage the provision of social housing support. The provision of tenancies in local authority dwellings is one component of social housing support. Other forms of social housing support include:
- Tenancies in AHB properties
  - Housing Assistance Payment (HAP)
  - Rental Accommodation Availability Agreement (RAAA) or Rental Accommodation Scheme (RAS) – however these forms of housing support are considerably less common and are being replaced with HAP.
- 12.2 Social housing support entails specialist housing for particular groups, such as housing for older people and for disabled people. Some members of the Traveller community choose to access mainstream social housing supports while others opt for Traveller-specific accommodation.
- 12.3 While tenancies in standard accommodation are provided by local authorities in line with DHLGH policy, a similar system of tenancy in culturally-appropriate accommodation for Travellers – such as rental trailers – is not provided nationally. However, some local authorities do allow families to rent trailers, particularly in cases wherein local authorities purchase a trailer in light of an emergency and rent it to a family. NT MABS state that the provision of trailer rentals in these circumstances indicate that the lack of specific legislation underpinning a rental scheme does not prohibit the provision of such a scheme.
- 12.4 The 2022 report [Proposal for a National Caravan Rental Scheme](#) – published by National Traveller MABS – includes a critique of existing schemes concerning the provision of trailers to the Traveller community, a case for the benefits of a loan scheme as well as a proposal for how the scheme could be operated.
- 12.5 NT MABS identify the following potential benefits of a trailer rental scheme:
- Affordable accommodation – members and families from the Traveller community would be less likely to incur debt when accessing housing

- Energy-efficiency and improved living conditions – a rental scheme would allow for the provision of more energy-efficient trailers in a cost-effective manner
- Safer maintenance – under the Caravan Loan Scheme, families are responsible for the maintenance of trailers and, as a result, those who cannot afford to pay for qualified technicians often undertake maintenance themselves. Safety and maintenance would be improved if local authorities were funded to undertake maintenance works on rented trailers
- Cost efficiency for DHLGH – while there would be higher upfront costs in purchasing trailers to rent to the Traveller community, the cost would decrease over time as the rate of replacement of units declines.

## **13. The Conditions of a Trailer Rental Scheme**

13.1 Several witnesses informed the Committee of elements which should feature in a proposed Trailer Rental Scheme. As mentioned previously, NT MABS has published a proposal for how a Trailer Rental Scheme would be operated. This report features headings concerning:

- Eligibility for the scheme
- The procurement of trailers for a rental scheme
- The insurance of trailers
- Connection to services
- The maintenance of trailers
- Tenancy agreements.

13.2 NT MABS propose that those on the social housing list who have expressed an interest in living in Traveller-specific accommodation would be eligible for a rental scheme.

13.3 Regarding the procurement of trailers, they propose that DHLGH provide a stream of funding to local authorities for the purchase and maintenance of trailers. They suggest that local authorities would purchase trailers of a minimum BS3632 2015 standard directly from manufacturers.

13.4 They also propose that local authorities insure trailers while those dwelling in the trailers obtain insurance for their belongings, as occurs in other forms of local authority housing.

13.5 In respect of connection to utilities, the report suggests that local authorities should take responsibility for connecting trailers to service such as water, electricity and gas. The report states that this will prevent safety issues which can emerge when families are required to connect their homes to services themselves.

13.6 Regarding maintenance, NT MABS suggests that local authorities should be responsible for structural maintenance issues whereas those dwelling in the property are responsible for minor maintenance issues and that the arrangements for those who reside in other forms of local authority housing should be replicated to this end.

13.7 The report proposes that the tenancy agreement should cover both the rent of the bay and the trailer and should include a clause regarding the replacement of the unit.

13.8 In respect of the rent amount, Bernard Joyce of the Irish Traveller Movement told the Committee that it is important that tenants be charged differential rents, as per the current model of social housing. Mr Joyce said that:

“It is really important that a person's means be assessed in terms of what they can afford. I understand that, at the moment, there is some level of means testing within this, but we are also looking at the context whereby it should be means tested overall, between the rental for the bay and the rental for the caravan, and not added as an additional payment. The majority of Travellers are living under the poverty line, so having excessive costs associated with a home being replaced is not viable or conducive in the long term to any family.”