



**Response to Draft Northern Ireland Housing
Executive Irish Traveller Accommodation
Strategy 2026-2031**

October 2026

Executive Summary

Given declining provision of Traveller accommodation across Northern Ireland, the protections afforded to Travellers under the Race Relations Order, and ongoing evidence of poor conditions across Traveller sites, we emphasise the critical importance of ensuring that this Strategy delivers tangible and meaningful improvements for Travellers. Persistent evidence of inadequate Traveller accommodation provision highlights the risks of discrimination and lack of equality of opportunity for Travellers, and the critical importance of the Housing Executive ('NIHE') taking effective steps to recognise and meet the specific accommodation needs of Travellers.

The Commission welcomes the Housing Executive's continued focus on Traveller accommodation as a distinct issue and welcomes the opportunity to comment on the draft Irish Traveller Accommodation Strategy. However, we are concerned that the draft Strategy lacks the ambition and detail necessary to provide confidence that it will deliver significantly improved outcomes compared with previous strategies that have largely failed to achieve their intended objectives.

We are concerned that the outgoing 2021–2026 Strategy has not been subject to sufficiently comprehensive evaluation. A checklist of achievements is not a substitute for a clear assessment of implementation, impact, shortcomings and lessons learned, nor does it clearly demonstrate how learning from the previous Strategy has informed the development of the new Strategy.

The Commission welcomes NIHE's proposed enhanced accommodation needs assessment as essential to targeting action on Traveller housing inequalities. However, delays in approving and implementing the methodology risk undermining provision, as site identification and development depend on accurate needs assessment. We consider that, while the needs assessment is essential for long term planning, there is sufficient data and evidence to inform the Housing Executive's approach in the interim.

We are also concerned that equality screening appears to have been undertaken late in the development of this policy, was not initially published, and does not demonstrate a robust assessment of equality impacts across the full range of Section 75 groups represented within

the Traveller community. It is also unclear how the equality impacts of the previous Strategy have been assessed and how these have informed the present Strategy.

It is of the highest importance that the NIHE ensures the 2026–2031 Strategy delivers meaningful and measurable improvements for Travellers. Within this response, we have made several recommendations to be reflected in the final Strategy, including around screening, engagement, targets and delivery. In finalising the Strategy, the NIHE should address these recommendations and set out clear, measurable and adequately resourced actions to improve the provision of culturally appropriate accommodation.

Recommendations

Given declining provision of Traveller accommodation, the protections afforded to Travellers under the Race Relations Order, and the lack of progress within this area, it is of the highest importance that this Strategy delivers for Travellers. The Commission has seven key recommendations to be reflected in the final version of the Irish Traveller Accommodation Strategy.

Recommendation 1: Evaluation. The Northern Ireland Housing Executive should provide further detail on how it has evaluated the delivery of the previous Irish Traveller Accommodation Strategy, including lessons learned from that evaluation.

Recommendation 2: Consultation. The Northern Ireland Housing Executive should ensure their consultation on the Accommodation Strategy is accessible and meaningfully engages with Travellers.

Recommendation 3: Screening. Given concerns highlighted regarding the equality screening of the Strategy, Northern Ireland Housing Executive should revise its equality screening and publish the revised screening on the consultation page in accordance with its equality scheme commitments.

Recommendation 4: Needs Assessment. The Northern Ireland Housing Executive should begin implementation of the Enhanced Traveller Accommodation Needs Assessment immediately following internal approval and publish a clear timetable for completion, including how its findings will inform annual housing needs assessment, site identification and future Traveller accommodation provision.

Recommendation 5: Targets. The Strategic Development Plan should set out measurable targets, timescales and resource commitments for the delivery of culturally appropriate Traveller accommodation.

Recommendation 6: Delivery. The Northern Ireland Housing Executive should engage meaningfully with Travellers throughout the implementation of the Strategy and ensure that it effectively addresses and meets their accommodation needs.

Recommendation 7: Monitoring. The Northern Ireland Housing Executive should set out the monitoring mechanisms it will establish or utilise to monitor the impact of the Strategy.

Table of Contents

1	BACKGROUND.....	1
2	CONTEXT	2
	DECLINING PROVISION	3
3	COMMISSION RECOMMENDATIONS	5
	RECOMMENDATION 1: EVALUATION	5
	RECOMMENDATION 2: CONSULTATION	6
	RECOMMENDATION 3: SCREENING	7
	RECOMMENDATION 4: NEEDS ASSESSMENT	9
	RECOMMENDATION 5: TARGETS	10
	RECOMMENDATION 6: DELIVERY.....	11
	RECOMMENDATION 7: MONITORING.....	12

1 Background

- 1.1 The Equality Commission for Northern Ireland ('the Commission') is an independent non-departmental public body established under the Northern Ireland Act 1998.
- 1.2 In general terms, our statutory remit provides that we are to:
- promote equality of opportunity and affirmative action
 - work towards the elimination of unlawful discrimination and harassment
 - keep relevant legislation under review
 - promote good relations between persons of different racial groups and good disability practice
 - oversee the statutory equality duties on public authorities.
- 1.3 The Commission responded to the consultation¹ on the Northern Ireland Housing Executive's (NIHE) previous Draft Traveller Accommodation Strategy (2021-2026), and we welcome the opportunity to respond to the present Draft Traveller Accommodation Strategy.²
- 1.4 The Commission has been a consistent advocate for targeted actions to address the specific accommodation needs of Irish Travellers.³
- 1.5 Our 2009 report⁴ 'Outlining Minimum Standards for Traveller Accommodation' serves as a useful reference point for our continued and ongoing engagement regarding equality issues facing Irish Travellers in Northern Ireland.
- 1.6 We welcomed engagement with NIHE during the consultation process, in which we provided initial views on the Strategy, as

¹ ECNI (2020); Response to NIHE Irish Travellers Accommodation Strategy 2021-26

² NIHE (2026); Draft Traveller Accommodation Strategy 2026-2031; [Consultations - Northern Ireland Housing Executive](#)

³ See ECNI (2024) "NIHE Draft Corporate Plan 2025/26 – 2027/28 Consultation Response" and ECNI (2024) "NIHE Draft Community Involvement and Cohesion Strategy 2024 -2029 Consultation Response".

⁴ ECNI (2009); 'Outlining Minimum Standards for Traveller Accommodation'

well as highlighting key considerations regarding the consultation.

2 Context

- 2.1 The Race Relations (NI) Order 1997 defines Irish Travellers as a “community of people commonly so called who are identified (both by themselves and by others) as people with a shared history, culture and traditions including, historically, a nomadic way of life on the island of Ireland.”
- 2.2 Most significantly, Irish Travellers are recognised in statute as a racial group for whom there are protections from discrimination. Irish Travellers experience many challenges and inequalities in housing, ranging from inadequate supply and standard of accommodation, intimidation and attacks on housing, and a lack of awareness of housing rights.
- 2.3 In our 2009 paper entitled ‘Outlining Minimum Standards for Traveller Accommodation’, we concluded that a severe undersupply of suitable accommodation, poor standards in relation to site provision, delays and obstacles in the development of new sites and considerable adverse impacts on Traveller households were central issues facing Travellers and which warranted legal and policy interventions.
- 2.4 More recently, the NI Human Rights Commission report ‘Out of Sight, Out of Mind: Travellers’ Accommodation in Northern Ireland⁵ (2018) provided evidence of ongoing issues in the delivery of Traveller accommodation, including lack of availability of sites, conditions on sites, and delays in securing essential repairs and maintenance.
- 2.5 The report noted that there continued to be ‘an erosion of nomadic life through the policies and practices that have been developed and applied to Travellers and Travellers’ accommodation.’⁶
- 2.6 Recent research by The Lead (2024)⁷ found that public sites for Irish Traveller communities in Northern Ireland are affected by recurrent and persistent sanitary issues including sewage and

⁵ Northern Ireland Human Rights Commission (2018): [Out of Sight, Out of Mind: Travellers’ Accommodation in Northern Ireland](#)

⁷ The Lead (2 March 2024): [Dire conditions on Travellers sites in Northern Ireland ignored by Stormont](#)

vermin problems alongside continuing threats of paramilitary violence against Traveller communities.

- 2.7 Travellers also face disproportionately more prejudice and discrimination than other ethnic groups. The Northern Ireland Life and Times Survey (2024) found that almost one-third of survey respondents (31%) did not agree that they would willingly accept Irish Travellers living in a house as residents in their local community.⁸ Travellers and Roma also face the highest levels of prejudice of any ethnic group in the Republic of Ireland, according to new ESRI research on attitudes to social groups.⁹
- 2.8 The Commission, in its response to the NIHE Draft Community Involvement and Cohesion Strategy 2024 -2029¹⁰, expressed support for specific actions to address negative stereotypes and prejudice against Travellers, and to promote community cohesion between Travellers and non-Travellers.
- 2.9 These persistently high levels of prejudice, longstanding evidence regarding inadequate provision of Traveller accommodation, and the associated risks of unlawful discrimination underscore the importance of NIHE ensuring that Travellers' specific accommodation needs are recognised and met.

Declining Provision

- 2.10 Travellers require accommodation that supports the unique cultural needs of Travellers. In Northern Ireland, the NIHE has a statutory duty to provide culturally appropriate accommodation for Irish Travellers¹¹ and they are prevented from discriminating against Irish Travellers on the grounds of race¹² in the provision of these housing services. NIHE have further duties¹³ to ensure that Travellers have equality of

⁸ [Northern Ireland Life and Times Survey: ~year](#)

⁹ [New ESRI research finds high levels of prejudice against Travellers and Roma in Ireland | ESRI](#)

¹⁰ ECNI (2024) "NIHE Draft Community Involvement and Cohesion Strategy 2024 -2029 Consultation Response"

¹¹ Article 125 of [The Housing \(Northern Ireland\) Order 2003](#)

¹² Article 5 of the Race Relations Order 1997

¹³ Section 75. [Northern Ireland Act 1998](#)

opportunity in accessing appropriate accommodation that meets their needs.

- 2.11 Sited accommodation has been in decline in recent years, with only four sites operational at the time of writing, compared to seven NIHE-managed Travellers' sites in 2018¹⁴ and sixteen in 2009.¹⁵ There are no emergency sites currently in operation in Northern Ireland and the two remaining transit sites currently being redeveloped into smaller, permanent serviced sites.
- 2.12 The impact of this decline in the availability of appropriate accommodation for Irish Travellers is clearly demonstrated by overcrowding on existing sites, where conditions are reported to be poor.¹⁶ NIHE indicate in their most recent Traveller accommodation survey of 50 Traveller households that 19 (38%) households had no hot water; 16 (32%) had no indoor toilets, and 10 (20%) had no electricity.¹⁷
- 2.13 Another consequence of the cumulative impact of declining site numbers, the compression of site capacity, and the reduction in site type has been that many Irish Travellers have resorted to pitching caravans on land that is not formally designated for that use, exposing them to the risk of eviction in accordance with the Unauthorised Encampments Order (NI) Order 2005, whereby their caravans and possessions may be impounded or confiscated if they are found to have breached the law.
- 2.14 The ICESCR Committee have expressed concern at how the 2005 Order "makes Roma/Gypsies and Irish Travellers liable to be evicted from their homes, to have their homes destroyed and then to be imprisoned and/or fined" and have called for this legislation to be repealed.¹⁸
- 2.15 Addressing downward trends in sited accommodation are made more pressing when set against the backdrop of the increasing population of Irish Travellers in Northern Ireland, as indicated by recent data. Census data indicate that the number of people

¹⁴ NIHRC (2025) "Letter to Irish Traveller Policy Unit re Review of Irish Travellers' Accommodation Strategy 2021-2026"

¹⁵ Gray, P. (2009) "Outlining Minimum Standards for Traveller Accommodation."

¹⁶ [Dire conditions on traveller sites in Northern Ireland ignored by Stormont | The Lead](#)

¹⁷ ['Nomadic life has all but disappeared from Traveller culture in the north' - Investigations & Analysis - Northern Ireland from The Detail](#)

¹⁸ [Publication - 'Out of Sight, Out of Mind': Travellers' Accommodation in NI - Full Report | Northern Ireland Human Rights Commission](#)

identifying as Irish Travellers in Northern Ireland increased from approximately 1,300 in 2011 to 2,610 in 2021, representing an increase of around 101%. The 2021 census also found a very young age profile, with 52% of Irish Travellers aged under 25, which is consistent with continued population growth and future accommodation demand.¹⁹

- 2.16 The Commission notes data provided indicating a preference on behalf of Travellers for social housing. We highlight that this shift in housing preference may be consequence of the untenability of culturally appropriate alternatives.

3 Commission recommendations

- 3.1 The Commission has seven key recommendations to be considered within the development of the Irish Traveller Accommodation Strategy, and which we trust will be reflected in the final version.

Recommendation 1: Evaluation

- 3.2 The ongoing deterioration in the quantity and quality of Traveller accommodation in Northern Ireland clearly indicates that the NIHE's previous series of Traveller Accommodation Strategies have not effectively delivered for Travellers. It is therefore of critical importance to the Commission that the outgoing Strategy is comprehensively and critically evaluated and that lessons are learned from its shortcomings.
- 3.3 The listed achievements of the outgoing Strategy are welcomed, however, providing a checklist of key achievements does not serve as a substitute for a comprehensive assessment or analysis of that Strategy. It is essential that Travellers voices and experiences are central in informing any such evaluation.
- 3.4 In light of the NIHE's continuing duties under Section 75 of the Northern Ireland Act²⁰, the Commission expects to see a more in-depth evaluation of the outgoing Strategy, including clear

¹⁹ [Ethnicity, Place of Birth, Language, and Religion Ireland and Northern Ireland - A Joint Census Publication 2021-2022 - Central Statistics Office](#)

²⁰ Section 75 of the [Northern Ireland Act 1998](#)

evidence linking lessons learned from that evaluation to decisions made in the development of policy going forward.

- 3.5 This would not only improve policy development by identifying areas where insufficient progress has been made and approaches that have proven to be ineffective, it would also likely improve relations with Travellers by acknowledging where insufficient progress has been made.

Recommendation: Evaluation. The Northern Ireland Housing Executive should provide further detail on how it has evaluated the delivery of the previous Irish Traveller Accommodation Strategy, including lessons learned from that evaluation.

Recommendation 2: Consultation

- 3.6 The draft Strategy states that “The Strategy was informed through consultation with Irish Travellers and stakeholders, alongside research, accommodation data and learning from the delivery of the Irish Traveller Accommodation Strategy 2021-2026” but does not clearly articulate how this process of learning took place and how it informed the development of the new strategy.
- 3.7 We also understand that an easy-read document initially produced by the NIHE to support engagement during the consultation period was not endorsed as an adequate basis for meaningful consultation by the Traveller Thematic Group. An appropriate and accessible document accompanying the Strategy is crucial in ensuring that Irish Travellers, especially those with lower levels of literacy, can fully consider and respond to the consultation.
- 3.8 We recommended to the NIHE that the consultation period be extended to enable to development of an accessible version of the consultation document, and welcome that the consultation has since been extended. We are aware and welcome that NIHE has been developing a plain-English version, which it intends to publish.
- 3.9 As highlighted in meetings with NIHE, given literacy and internet accessibility challenges, we would also strongly recommend NIHE undertakes in-person consultation exercises

to ensure Travellers have the opportunity to engage in a meaningful manner in the consultation process. It was welcomed to hear that NIHE's had planned for events in Derry and Omagh, as well as plans for Traveller liaison officers to discuss the Strategy on site-visits. We recommended that officers are provided with a template/guide to shape those conversations, ensure consistency, and to help record the observations of Travellers across the sites. This should then inform any necessary revisions to the final Strategy.

- 3.10 We draw attention to NIHE's Equality Scheme regarding their own commitments on conducting consultations- [Equality - Northern Ireland Housing Executive](#), specifically related to principles, accessibility, and engagement.
- 3.11 We also draw attention to page 38 of our Section 75 guidance for public authorities, which covers consultations - [Section 75 of the Northern Ireland Act 1998 - A Guide for Public Authorities](#).

Recommendation: Consultation. The Northern Ireland Housing Executive should ensure their consultation on the Accommodation Strategy is accessible and meaningfully engages with Travellers.

Recommendation 3: Screening

- 3.12 Equality screening is an important part of the policy development process and supports meaningful consultation. The Commission has a statutory role in providing advice to public authorities on their Section 75 equality duties. This includes advice relating to equality screening and equality impact assessment processes outlined in their approved equality schemes.
- 3.13 The Commission is concerned that the potential impacts of the Strategy on equality of opportunity and good relations have not been assessed and are not presented in a screening document for consultees to see.
- 3.14 We note that, to date, the screening has not been published by NIHE. The NIHE commits in its equality scheme to publish all screening assessments on its website as soon as practicable following completion. The NIHE should publish their screening

at the initiation of public consultation so that it can be read alongside the policy proposals made.

3.15 In terms of the equality screening on the draft Strategy, it is not clear whether it:

- Identifies opportunities to better promote equality of opportunity for Travellers across the nine Section 75 equality categories.
- Recognises that the Traveller community is diverse and may encompass individuals across all nine Section 75 categories.

3.16 The screening appears to treat the Traveller community as a homogenous group and does not necessarily account for the needs of Travellers across different Section 75 groups. The general argument that a policy is beneficial to everyone it targets does not remove the need for equality screening and/or assessment.

3.17 In the case of Travellers, for example, an equality screening could help identify differential impacts within the community and across other equality groups. It is unclear, for example, whether the design of the Strategy has considered its impact on Travellers with disabilities, older Travellers, younger Travellers, or other groups with intersecting identities across Section 75. A screening/EQIA ensures those impacts are assessed, and that mitigating actions are identified.

3.18 We would like to acknowledge positive engagement with NIHE regarding their screening, which is ongoing and that NIHE have agreed to undertake a review. We ask that the evidence in this document informs its further assessment of the potential equality impacts of the aims/goals for its Strategy.

3.19 We would expect that in revising the screening, any necessary changes to the Strategy are also highlighted and reflected in the final version of the Accommodation Strategy.

Recommendation: Screening. Given concerns highlighted regarding the equality screening of the Strategy, Northern Ireland Housing Executive should revise its equality screening and publish the revised

Recommendation 4: Needs Assessment

- 3.20 In January 2002, the NIHE initiated a comprehensive assessment of Traveller accommodation needs across Northern Ireland. The assessment examined Traveller population and household characteristics, existing accommodation, and issues affecting the Traveller community, and made a series of recommendations.
- 3.21 The key recommendation of the 2002 assessment was the establishment of a rolling five-year programme of Traveller accommodation schemes. This programme was intended to inform, and be updated through, the NIHE's annual General Needs Assessment process so that Traveller accommodation needs were considered as part of routine annual housing planning.
- 3.22 The Equality Commission, in its 'Outlining Minimum Standards in Traveller Accommodation' report in 2009, identified that the delivery of new serviced and transit sites was being "hampered by a range of difficulties including problems identifying and acquiring sites at suitable locations, and objections from residents and elected representatives to most proposals."
- 3.23 We stated in that report that accommodation for Travellers should be planned and developed in a proactive manner [by NIHE], based on robust needs assessment and regular consultation with Travellers.
- 3.24 The Commission welcomes the NIHE's commitment within the draft Strategy to a targeted, enhanced Irish Traveller Accommodation Needs Assessment.
- 3.25 Notwithstanding, the Commission is concerned as to whether Traveller accommodation is being effectively incorporated into annual General Needs Assessments or informing councils' consideration of land-use requirements and planning decisions.
- 3.26 The proposed enhanced Needs Assessment methodology should provide the evidence NIHE needs to determine whether additional Traveller-specific accommodation is required, where

it should be located and how existing sites should be redeveloped. However, given the relatively small Traveller population and the substantial statistical evidence already available, including Census 2021 data, delays in developing, approving or implementing the methodology should not delay delivery.

- 3.27 The enhanced Needs Assessment should be implemented as a priority and without further delay. In advance of the delayed Irish Traveller Accommodation Survey 2026, NIHE should publish a clear interim plan explaining how need is currently identified and addressed through existing structures and mechanisms. NIHE should also publish a timetable for completing the enhanced Needs Assessment, providing transparency for Irish Travellers and ensuring that its findings inform planning, site identification and future Traveller accommodation provision in a timely and accurate way.

Recommendation: Needs Assessment. The Northern Ireland Housing Executive should begin implementation of the Enhanced Traveller Accommodation Needs Assessment immediately following internal approval and publish a clear timetable for completion, including how its findings will inform annual housing needs assessment, site identification and future Traveller accommodation provision.

Recommendation 5: Targets

- 3.28 We welcome the NIHE's commitment to "Produce a Strategic Development Plan for any newly identified potential Irish Traveller sites, following implementation of the Accommodation Needs Assessment." We remain concerned, however, that this action will not commence in Year 1, as it is dependent on the completion of the Needs Assessment.
- 3.29 As previously highlighted and while recognising the importance of the Needs Assessment underpinning wider strategic actions, we are concerned at the lack of clear targets and commitments within the draft Accommodation Strategy.
- 3.30 It is important that the Strategic Development Plan sets out measurable targets, timescales and resource commitments for the protection, redevelopment and expansion of culturally

appropriate Traveller accommodation. Furthermore, given that the Strategic Development Plan likely will constitute many actions related to the delivery of the Strategy overall, we remind NIHE that the statutory duties in S75 are continuing ones and the Equality Scheme processes should be applied appropriately at all stages of policy development, implementation and review.

Recommendation: Targets. The Strategic Development Plan should set out measurable targets, timescales and resource commitments for the delivery of culturally appropriate Traveller accommodation.

Recommendation 6: Delivery

- 3.31 Given declining provision of Traveller accommodation and the lack of progress within this area, it is of the highest importance that this Strategy delivers for Travellers. Effective delivery of the Strategy will require NIHE to demonstrate leadership and to ensure an appropriate level of resourcing.
- 3.32 The Commission is concerned that the provision of culturally appropriate Traveller-specific accommodation is not being afforded the same degree of prioritisation as other social housing options. As previously highlighted, in our 2009 paper entitled ‘Outlining Minimum Standards for Traveller Accommodation’, we concluded that a severe undersupply of suitable accommodation, poor standards in relation to site provision, delays and obstacles in the development of new sites and considerable adverse impacts on Traveller households were central issues facing Travellers and which warranted legal and policy interventions.
- 3.33 Since 2009, there has been little improvement on this front and there is little evidence to suggest that the series of NIHE Irish Traveller Accommodation Strategies have mitigated this deterioration.
- 3.34 The Commission notes NIHE data²¹ indicating a preference on behalf of Travellers for social housing. We highlight that this shift in housing preference may be a consequence of the untenability of culturally appropriate alternatives and would caution against assuming this reflects an absence of demand

²¹ NIHE (2026); Draft Traveller Accommodation Strategy 2026-2031; [Consultations - Northern Ireland Housing Executive](#)

or need for Traveller-specific accommodation. Accommodation provided should in no way lead to the diminution of the traditional way of life for Travellers, nor should the lack of suitable accommodation force Travellers to move into social housing.

- 3.35 There are concerns regarding the levels of engagement with Travellers during the design of the new Strategy and we further note that attendees at the last meeting of the Traveller Thematic Group pointed to a cumulative failure of NIHE to involve community and advocacy organisations. Going forward, the NIHE should demonstrate and document engagement with Travellers and Traveller support groups to ensure effective implementation of the new Strategy.

Recommendation: The Northern Ireland Housing Executive should engage meaningfully with Travellers throughout the implementation of the Strategy and ensure that it effectively addresses and meets their accommodation needs.

Recommendation 7: Monitoring

- 3.36 Monitoring arrangements which are clearly aligned to equality scheme monitoring commitments should be more clearly defined to ensure that effective monitoring of any adverse impacts takes place.
- 3.37 The Equality Commission has long identified the need for robust equality data in Northern Ireland, both to enable good evidence-based policy making and to ensure effective compliance with the equality and good relations duties established by the Northern Ireland Act 1998.
- 3.38 The Commission has also consistently recommended that public authorities collect detailed equality disaggregated data to inform public policy making and service delivery. This is so that equality considerations are at the heart of public policy making and are informed by the specific needs of those experiencing inequalities. We have also highlighted both the lack of equality data generally, and the lack of data disaggregated by equality ground, that is available to policymakers in Northern Ireland.

3.39 The Commission advises that duties arising from Section 75 are continuing ones and should also be revised considering consultation responses received. Equality Commission officers are available to provide advice and further guidance on these issues.

More information on public authorities Section 75 obligations, specifically in relation to screening can be found at: [Equality screening | Equality Commission NI](#).

Recommendation: The Northern Ireland Housing Executive should set out the monitoring mechanisms it will establish or utilise to monitor the impact of the Strategy.