

South Dublin County Council Equality Action Plan- Traveller Accommodation

The Equality Action Plan- Traveller Accommodation supports the Council's <u>Public Sector Equality and Human Rights-Duty Framework</u> and our <u>Corporate Plan</u> values in particular that of: Inclusiveness, equality, and accessibility. We will prioritise social inclusion, equality of access and opportunity, and the needs of the most vulnerable people in society when we design and deliver services. The Plan was prepared in consultation with the Local Traveller Advisory Accommodation Committee (LTACC). It is a working document and will be updated periodically to reflect the outcomes and progress to date for each of the actions and will be a standing item on LTACC meeting agendas. Our Action Plan sets out our aim and objectives on how we will meet our statutory obligations under section 32 (1) (b) of the Irish Human Rights and Equality Commission Act 2014 to further the promotion of equality and opportunity regarding access to and provision of Traveller specific accommodation and services to Travellers in the Council's administrative area. We want to ensure that the local Traveller Community and stakeholders identify South Dublin County Council (SDCC) as an organisation that promotes equality of opportunity for all our citizens.

Preparation of the Equality Plan

This plan was prepared by the Traveller Accommodation Unit in consultation with the Local Traveller Accommodation Consultative Committee (LTACC) who engaged in the consultative process for the preparation of the Equality Action Plan. The LTACC membership includes six Elected Representatives, the Director of Housing, Social and Community Development, staff from the Traveller accommodation unit and four Traveller representatives from Clondalkin and Tallaght Development Groups. It is acknowledged that the engagement through the LTACC would be benefit from further strengthening to support the local delivery of Traveller Accommodation.

1. To improve the accu	1. To improve the accuracy of the annual count/census of Traveller Accommodation needs in the function area of the Council					
Activity	Timescale	Directorate	Outcome	Actions		
1.1. to evaluate the	November 2023	Housing, Social and	• There is accurate,	The introduction		
existing methods used for		Community Development	robust, and	of the Irish		
the count/census in		(HSCD)	comprehensive	Traveller identifier		
consultation with			collection of data in	on Social Housing		
members of the Traveller			conjunction with	application forms		
community and			Traveller	now enables SDCC		
representative groups,			Community and	to collate relevant		
and action findings of this			their	Traveller specific		
evaluation, including on			representatives	data.		
accuracy and efficacy of						
current methods;			Information/Data is	Annual Traveller		
			shared where	Census conducted		
			relevant across the	on site by staff		
			HSCD directorate	from the Traveller		
			and with partner	Accommodation		
			groups	Unit in		
				partnership with		
				Tallaght and		
				Clondalkin		
				Traveller		
				Development		
				groups.		
				Consult with		
				Allocations, RAS,		
				Allocations, RAS,		

Section 1- Promote Equality of Opportunity

			HAP, Homeless and AHBs in preparation of annual estimate of Traveller families
			 Accurate recording of Traveller families sharing accommodation in Traveller Specific accommodation
			 Report to be provided at each LTACC meeting on number of applicants on the housing list who have identified as Irish Traveller.
1.2. to improve the quality and accuracy of the count/census of Traveller accommodation needs, where appropriate in coordination with	Quarter 1 2024	 Assessment of Need for Traveller Accommodation to prepared for TAP 2024-2029 	 GIS interactive mapping of current Traveller Accommodation Sites within the County with key

national bodies and other local authorities;		 To develop a comprehensive understanding of what data we can share with national bodies and other local authorities 	statistics by electoral area GIS mapping to include statistics on the number of families living on each Traveller specific accommodation site Proposed locations for new Traveller Accommodation to be mapped as part of the TAP 2024-2029 process
1.3 . to enable accurate capturing of multiple accommodation preferences of members of the Traveller community within the Council's functional area	Ongoing	 To develop through our Integrated Housing System a report that captures the accommodation preferences of members of the Traveller Community 	 Data to be updated to include in order of preference accommodation options including standard and group housing, permanent residential sites for caravans

			 Identify the need for Age Friendly and Medically adapted homes Business case to be submitted for the recruitment of Traveller Accommodation Worker Greater use of infographics to display data/digital dashboard
1.4. to ensure that any additional and relevant information that will impact on accommodation planning and/or delivery is properly captured in the count/census, including new family formations; and	Ongoing	 To collect and analyse soft data about the Traveller community from frontline workers to completement our statistical data and support our approach to equalities 	 Business case to be submitted for the recruitment of Traveller Accommodation Worker Monthly Traveller Clinics Quarterly meetings to be arranged with Traveller Development Groups

			reach th 18 on or 31 st Dec 2029. Da presente	r TAP 029 will tion on rs who will he age of r before eember ata to be ed in age 3-15, 15-
1.5. to implement processes for that information to directly influence decisions and policy on Traveller accommodation provision by the Council.	Quarter 1 2024- Commencement of TAP process for 2024-2029	 To provide open data in innovative way and to engage with Traveller representative groups and partner agencies to inform and influence decisions and policy All decision and policy on Traveller Accommodation provision will be proofed in accordance with 	 2022-20 Traveller Accomm Program 2029 Dublin R Homeler Plan 202 	Action 21-2026 oment Plan 028 r nodation nme 2024- Regional ss Action

-	, or planned, to address the AP') and related progress rep		the Public Sector Equality and Human Right's Duty Framework esented - specifically in the Tra	aveller Accommodation
Activity	Timescale	Directorate	Outcome	Actions
2.1. a breakdown, by accommodation type, of current accommodation status of Travellers in the functional area of the Council, where appropriate linked to above action (a); and	Ongoing	Housing, Social and Community Development	 To produce a report by accommodation type of the current status of Travellers in SDCC's administrative area 	 Current breakdown to be produced on accommodation type by electoral area
2.2. details of the specific accommodation needs and preferences of Travellers in the functional area of the Council, and how these are identified;	Quarter 1, 2024		 To develop a report through our Integrated Housing System that details the preferences of Travellers in our functional area through analysis of data provided through TAP assessment of need process 	 Currently applicants are required to indicate the type of social housing support that best meets their needs but not in order of their preference. New questionnaire to be developed for the TAP

				assessment of need process
2.3 . details of how these accommodation needs are to be met through the TAP and related processes, with assignment of roles to relevant stakeholders responsible for delivering on the TAP	Quarter 1, 2024	 Housing, Social and Community Directorate Approved Housing Bodies CENA Traveller Development Groups LTACC Staff Elected Members 	 Detailed estimate of the number of Travellers for whom accommodation will be required and their preferences during the course of the programme 	 Identify the need for: Standard Social Housing Group Housing Voluntary Housing Halting Site/Bay Transient Assign relevant stakeholder's responsibility

Activity	Timescale	rd housing, and to sustain in Directorate	Outcome	Actions
3.1 . consultation with the relevant community and representative groups on the practical implications of Traveller ethnicity and the identification of priorities of Travellers within the functional area of the Council	Quarter 4, 2023	Housing, Social and Community Development	Development of engagement structures that are inclusive to the Traveller Community, we will do this by: • Ensuring consultation is at an early stage of service planning • Pilot new consultation tools	Consult with the Traveller Community and establish a Traveller residents panel to provide a structured forum for inclusive engagement and to examine the practical

	that increase	implications of
	engagement	Traveller ethnicity
	Creating effective	on culturally
	feedback	appropriate
	processes	accommodation
	following	exploring the
	consultation	following :
	constitution	
		✓ Horse Ownership
		✓ Social Economy
		 ✓ Living in a diverse
		community
		✓ Site and Waste
		Management
		• Consult with the
		other Dublin Local
		Authorities re: the
		hosting of a
		conference to trace
		the history of the
		Traveller
		Community across
		Dublin since the
		foundation of the
		state through the
		lived experience
		and handed down
		history of previous
		generations
		generations

3.2 . where identified as needed by the affected community, the promotion and facilitation of horse-ownership by members of the Traveller community residing in the functional area of the Council and availing of social housing support;	Quarter 1- 2024	 To undertake a Feasibility Study to identify a suitable location where the facilitation of horse ownership could be incorporated into the re- development of a Traveller Accommodation Group Housing Scheme 	 Feasibility Study to be undertaken in relation to horse ownership in Traveller specific accommodation. The Council currently facilitates /supports two Horse Projects in Tallaght and Clondalkin
3.3. where identified as needed by the affected community, the promotion of family cohesion and connection with extended family in the provision of housing to members of the Traveller community residing in the functional area of the Council;	Ongoing	 Future family formations to be identified through the TAP assessment of need 	 Pilot Choice based letting for allocations to new sites will take consideration of family formations
3.4 . responses to the other needs of members of the Traveller community to promote	Ongoing	 Organise, support, and celebrate events to promote and foster respect 	 The Council will use our website, social media platforms, citizens and staff

and foster respect for		for Traveller	newsletters and
Traveller culture; and		Culture	 intranet to publicise notable dates such as Traveller Pride Week Engagement with Travellers for community events and family fun days Travellers to be assisted to apply for grants and facilitator costs for Traveller specific cultural activities
3.5 engagement with Traveller and non- Traveller communities with the overall aim of fostering positive community relations.	Ongoing	Promote engagement between Traveller and non- Traveller Communities by encouraging people to work together for the benefit of each other and their local area	 Host cultural events e. plays, music, poetry, artistic events, and tin smithing/traditional craft demonstrations to build and promote Traveller Folklore To promote membership with residents' associations, Tidy Town Committees,

4. Steps taken to da	te. or planned. regarding cu	Iturally specific responses to	the needs of Travellers expe	Men and Women's Sheds criencing homelessness
Activity 4.1. the provision of culturally appropriate homeless accommodation	Timescale Ongoing	Directorate Housing, Social and Community Development	Outcome To implement Dublin Region Homeless 	Actions • SDCC together with DRHE has made specific
to members of the Traveller community who are experiencing homelessness, that responds to the preferences and needs of this group by, for example, providing accommodation that takes proper account of family size and reliance on family networks for support;		Dublin Regional Homeless Executive	Executive Action Plan 2022-2024	provision for larger family sizes in its stock of emergency accommodation.
4.2 the provision of specific supports for members of the Traveller community who are at risk of, or experiencing homelessness, ensuring that such supports are accessible and responsive to their needs, and that they take account of	Ongoing		 To make improvements in the quality and quantity of Traveller Specific Accommodation to reduce the risk of Homelessness SDCC have opened a new dedicated 	 There is a prevention service in SDCC (Focus Ireland Advice Centre) and as part of their brief they provide support including additional supports with

destant and the second	
digital and literacy	Housing Customer housing
challenges faced by some	Centre and staff applications for
members of the Traveller	are available from person who may
community	the Traveller and have digital
	Homeless Units by literacy issues.
	appointment to
	provide supports • The employment
	and advise to of Traveller
	prevent Homeless Accommodation
	and to assist with Worker could
	any digital and assist with assist Travellers in
	literacy challenges sourcing Private
	Rented
	Accommodation
	To advertise
	services of new
	Housing Customer
	Centre-
	Information Flyer
	to be provided to
	Traveller
	Development
	Groups
	Training on
	Housing on
	registering/using
	Housing On- Line
	Portal to be

			provided to Traveller Development Group staff.
4.3 the coordination and alignment of any actions and plans regarding homeless accommodation provision to members of the Traveller community with any national bodies (including, for example, the Programme Board and the Department of Housing's Traveller Accommodation Support Unit), thereby taking account of best practice developed at that level and making use of financial and research supports to inform appropriate actions	Ongoing	 To implement Dublin Region Homeless Executive Action Plan 2022-2024 To make improvements in the quality and quantity of Traveller Specific Accommodation (DHLGH, La's and AHBs) 	 Travellers were considered as a named vulnerable group in the Homeless Action Plan adopted by the 4 Dublin Local Authorities. Multi-agency response and close working with the HSE's social inclusion units and our Traveller specific accommodation units.

	5. Steps taken to date, or planned, responding to the needs of Travellers who are nomadic within and through the county through the provision of transient halting site bays as required					
Activity	Timescale	Directorate	Outcome	Actions		
5.1 engagement with members of the Traveller community within the functional area of the Council through the mid-term TAP review and/or other processes, to ascertain their true preferences with regard to transient halting sites and specifying actions to be taken pursuant to such engagement	Quarter 4 – 2023	Housing, Social and Community Development	 The Council to undertake a cconsultation process regarding the provision of a transient site in the county through engagement with the Traveller community and the three adjoining Dublin Local Authorities and the DHLGH regarding the establishment of a national network of transient sites 	 Appoint independent consultant to engage with members of the Traveller Community regarding the provision of a transient halting site in South Dublin County and to publish findings 		
5.2 engagement, where appropriate, with other local authorities for a coordinated approach to provision of transient sites in the Dublin region, and	Quarter 4-2023		 To consult with other Dublin Local Authorities and DHLGH with regards to national policy on the provision of 	 Identify other local authorities with Transient sites and arrange for LTACC to meet and discuss, how facilities are funded for construction and 		

identification of locations for transient sites pursuant to the TAP 2019 to 2024; 5.3 cooperation and coordination with national bodies (including, for example, the Programme Board, the Housing Agency and the Department of Housing) in relation to provision of a network of transient halting sites	2024		network of transient sites as per 5.3 below • To co-operate with the Programme Board and the DHLGH with regards to exploring the provision of an all -island approach to the provision of a network of Transient Sites across the island of Ireland	 associated maintenance/operational costs and rates set As above
-			essibility of the Caravan Loa	
Activity	Timescale	Directorate	Outcome	Actions
6.1. the current status	2022/2023	Housing, Social and	National Caravan	To implement National
and form of the Caravan		Community	Loan Scheme	Caravan Loan Scheme if
Loan Scheme (the		Development	available to	approved
'scheme'), noting the			Traveller's	
terms of the pilot		Department of Housing,	resident in Halting	
scheme in operation as		Local Government and	Sites/ in South	
of July 2021		Heritage	Dublin	

6.2. the expenditure	As above	● €580,000	• N/A
under the pilot scheme		approved in	
		Caravan Loans	
6.3. the number of	As above	• 47 applications	• N/A
applicants to the pilot		were received by	
scheme, the number of		SDCC in total. 20	
applications that were		applications were	
successful, and the		successful based	
number of applicants		on a priority of	
who have, in fact, been		need assessment.	
in receipt of a caravan		Out of the 20	
pursuant to the pilot		successful	
scheme		applicants, 17	
		applicants	
		pproceeded with	
		drawdown of the	
		caravan loan,	
6.4. any evaluation(s)	2023	 SDDC participated 	 Currently awaiting
undertaken of that pilot		in the National	findings of the National
scheme and actions		Evaluation	evaluation report by
planned or proposed on		Scheme	DHLGH
foot of the findings of			
any such evaluation(s)			
6.5. details of the	2022	 Plain English 	
communication of any		Proofed guide and	
ongoing scheme (pilot		application form.	
or otherwise), to			
members of the		 Forms printed 	
Traveller community		and provided to	
within the functional		Local Traveller	

area of the Council in an			Development	
accessible manner			Groups	
			•	
			Circulated to all	
			Halting Sites in	
			South Dublin's	
			Administrative	
			Area	
			Available on	
			www.sdcc.ie	
	2022			
6.6. the funding	2023		• 100% funding	
arrangements for any			provided by the	
ongoing scheme;			DHLGH	
6.7 any consideration of	2023		Full report in the	 No amendments to TAP
the scheme in the			mid- term Tap	2019-2024 required
course of the mid-term			Review provided	2010 2021 10441104
TAP review and related			to LTACC	
			IU LIACC	
amendments to the TAP				
on foot of that			Feedback from LTACC	
consideration				
			Request that	
			Rental Scheme	
			should be	
			introduced as	
			opposed to	
			caravan loan	
			scheme	
1	1	1	1	

		T T			
			•	Funding needs to	
				increase from	
				€30,000 to ensure	
				mobile homes	
				included 'Winter	
				Package'	
			•	Local Authority	
			•	-	
				should be	
				responsible for	
				maintenance of	
				units and	
				installation of	
				utilities	
6.8 the evaluation tools	2023		٠	Currently awaiting	
and reporting				National	
mechanisms that apply				Evaluation Pilot	
to the effectiveness of				Scheme Report by	
the scheme in its				DHLGH	
current form					

7. Steps taken to date, or planned, to address the 'indigenous requirement' wording in the TAP, to ensure that there is no discrimination when members of the Traveller community are compared to the requirements on the wider community						
Activity	Activity Timescale Directorate Outcome Actions					
7.1. the assessment of the wording in the mid-term TAP review	2023	Housing, Social and Community Development	 Assessment complete 	 Indigenous requirement to be removed from TAP requirement 		

7.2. the amendments to the wording in the TAP pursuant to the mid-term TAP review and any other process;	2024	 Removal of the indigenous requirement wording in the TAP 	•	Wording to be replaced as per requirements of Part 9 of Standard Social Housing Application
7.3 . the evaluation of decisions regarding social housing assessments and/or allocations to identify and address discriminatory treatment arising	Quarter 4, 2023	 SDCC to prepare new Allocations Scheme in accordance with Public Sector Equality and Human Right's Duty Framework 	•	Introduction of a complaint/ review process to include equality monitoring in evaluation of decision-making processes

Activity	Timescale	Directorate	Outcome	Actions
8.1. informing members of the Traveller community of the option to self-identify in the social housing application form	Ongoing	Housing, Social and Community Development	 Improve digital access/housing customer services to Travellers 	 Workshops to provide training to staff from Clondalkin and Tallaght Traveller development on the Council's Housing On- Line Customer Portal

		 New Housing Customer Centre to open with effect from 12th July 2023, appointments available to assist members of the Traveller Community with social housing applications
		 The Council and Traveller Development groups to promote the wider use within the Traveller community of the Irish Traveller identifier on social applications
8.2. collection and analysis of this data by the Council; and		 Data is now collected in Integrated Housing System and statistical

				information can be provided to LTACC
8.3 . use of the data to strengthen and inform decision-making including in relation to spending on provision of Traveller-specific accommodation and related services.	Ongoing	 To ensure accurate, robust, and comprehensive data to inform decision making in relation to the spending on Traveller specific accommodation 	•	Publish open data on Revenue and Capital expenditure on Traveller Accommodation on annual basis Pilot Traveller Participatory budget similar to the 'Have your Say'

9. Steps taken to date, or planned, regarding a pilot run with monthly clinics held in the offices of the Traveller Development Groups				
Activity	Timescale	Directorate	Outcome	Actions
9.1. assess the outcomes of any pilot	Quarter 2024	Housing, Social and Community Development Tallaght and Clondalkin Traveller Development Groups	 Monthly Clinics are now fully operational and form part of the TAU's outreach programme 	 Focus group to be held with Traveller Development Groups to review operation of monthly clinics
9.2. implement the learnings from the pilot	2024		 As above 	 TAU staff to report issues raised at clinics with other

9.3 arising from the pilot	2024	•	Business Case to	•	housing sections and other departments of SDCC Business cast to be
or elsewhere, including the possibility of employing a dedicated Traveller Liaison Officer.			be submitted for the recruitment of Traveller Accommodation Support Worker		submitted as part of Workforce Plan Review
9.4 . extend the pilot and/or similar ongoing service provision by way of monthly clinics and alternative or complementary supports	N/A	•	Monthly Clinics are now fully operational and form part of the TAU's outreach programme	•	Focus group to be held with Traveller Development Groups to review operation of monthly clinics
9.5 introduce new or updated practices and procedures to support Travellers in their engagement with the Council on housing issues	Ongoing	•	Pilot of new Choice Based Letting for Traveller Accommodation Units	•	Training to be provided to Traveller Development Groups on the new Housing online Portal.
		•	Dedicated Housing Customer Centre	•	TAU staff available to arrange appointments with Travellers in Housing Customer Centre

	Establishment of
	Resident's
	Associations

10. Steps taken to date, or planned, regarding the recording of data specifically on funds allocated and drawn down				
Activity	Timescale	Directorate	Outcome	Actions
10.1. clear and	Ongoing – Annual Budget	Housing, Social and	Produce clear and	Publish data on
transparent recording of	Processes	Community Development	transparent data	Capital
data on funds allocated			on drawdown of	Programme and
and drawn down for			funding for	Revenue Budget
Traveller-specific			Traveller – specific	expenditure
accommodation, and			and general	
separately for those for			accommodation	
general accommodation				
for all housing applicants				
10.2. implementing	Ongoing		 Implement 	Develop
procedures that enable			reporting on	procedures for
the Council to take			spend for	reporting spend
account of the true			Standard Social	on Traveller
preferences of members			Housing, Group	Accommodation
of the Traveller			Housing and	preference where
community whose			Halting sites, HAP,	the data is
accommodation needs			and RAS	available through
are met through general				the applicant
housing funds and of the				identifying as an
varying costs of different				Irish Traveller
forms of accommodation				
10.3. recording and	Quarter 4- 2023		 Publish report of 	 New reporting
reporting on the			drawdown of	template to be

drawdown and allocation		funding for	provided to LTACC
of funding for the		refurbishment of	, members detailing
refurbishment of existing		existing and new	spend by budget,
Traveller-specific		Traveller Specific	category, and
accommodation separate		Accommodation	reasons for non-
to general drawdown and			expenditure if
allocation of funds for			applicable
new Traveller-specific			
accommodation and			
separate to the funding			
from general housing			
funds for provision of			
housing to members of			
the Traveller community			

11. Steps taken to date, or planned, to assess and analyse the operation of new procedures set out in Circular 03/2020 (from the Department of Housing) on the rate of drawdown of funding for Traveller-specific accommodation					
Activity	Timescale	Directorate	Outcome	Actions	
11.1. measure the effectiveness of the new system for 2022, 2023 and beyond, and addressing any issues arising.	Quarter 3, 2023	Housing, Social and Community Development	 Publish report of drawdown of funding for refurbishment of existing and new Traveller Specific Accommodation 	 New reporting template to be provided to LTACC members detailing spend by budget, category, and reasons for non- expenditure if applicable 	

Section 2

Address Organisational Equality Arrangements including Equality Policy and Training

1. Steps taken to date,	or planned, regarding:			
Activity	Timescale	Directorate	Outcome	Actions
1.1 . the development and implementation of its equal status policy	Ongoing	Housing, Social and Community Development Corporate Performance and Change Management	 Promote equality of opportunity , eliminate discrimination and the protect the dignity and human rights of our Staff, Elected Members and our Customers Provision of Equality and Diversity training to Staff and Elected Members 	 South Dublin County Council Public Sector Equality and Human Rights Duty Framework published. Public Sector Duty page live on <u>www.sdcc.ie</u>
1.2 . the inclusion of an equality statement in the TAP	Quarter 1- 2024		 Inclusion of equality statement in new TAP 2024- 2029 	 Equality and human rights values statement included within the SDCC Public Sector Duty Framework.
1.3 . the inclusion of an equality statement in the Allocations Scheme	Quarter 4- 2023		Inclusion of equality statement in new Allocations Scheme	 Equality and human rights values statement

				included within the SDCC Public Sector Duty Framework.
1.4 the development and implementation of additional Council equality policies	Ongoing	 Implementation of Annual Action Plans through the Public Sector Equality and Human Rights Duty Framework and we will report our programmes and achievements in the Council's Annual Report 	•	To be considered within second annual action plan for SDCC Public Sector Equality and Human Rights Duty Framework
1.5 the operation of the new interdepartmental working group, including detail on Traveller representation and engagement, and to set out timebound steps to develop and progress the work of any such group	Quarter 3- 2023	 New interdepartmental working group to be established and external stakeholders will form part of this work as the implementation plan is developed and implemented 	•	Representatives from the Clondalkin and Tallaght Traveller representation groups were included in the Validation Group for the development of the SDCC Public Sector Equality and Human Rights Duty Framework.

		The Council's cross departmental equality and human rights working group is currently being redeveloped. Future engagement with the members of
		engagement with the members of
		the validation group will be
		developed by the updated working
		group.

Section 3

The Public Sector Equality and Human Rights Duty

1. Steps taken to date, or planned, to					
Activity	Timescale	Directorate	Outcome	Progress to date	
1.1. have regard to the	Quarter 1- 2024	Housing, Social and	• The TAP 2024-	 Council's Equality 	
need to eliminate		Community Development	2029 will be	Officer available to	
discrimination, promote			drafted under the	plain English proof	
equality of opportunity		Corporate Performance	Duty to take	TAP.	
and to protect the human		and Change Management	account of the	 Recognition of 	
rights of its staff and the			following steps:	intersectionality	
persons to whom it				and applying the	
provides services in any			✓ Access	equality and	

review or preparation of the TAP, as required under section 42(1)		 ✓ Address ✓ Report 		human rights framework and values statement during any review or preparation of the TAP will be essential.
1.2. have regard to the need to eliminate discrimination, promote equality of opportunity and to protect the human rights of its staff and the persons to whom it provides services in the assessments of housing applications and allocations, as required under section 42(1)	Quarter 4- 2023	 The Council's new Allocations Scheme will be drafted under the Duty to take account of the following steps: ✓ Access ✓ Address ✓ Report 		
1.3. have regard to the need to eliminate discrimination, promote equality of opportunity and to protect the human rights of its staff and the persons to whom it provides services in		 Provide diversity/cultural awareness trainin and tools for frontline staff working in Homeless Services to raise awarenes 	5	Recognition of intersectionality and applying the equality and human rights framework and values statement to homeless

homeless assessments and allocations, as required under section 42(1)	of the identified groups for the 'Duty' and that services are shaped according	 assessments and allocations will be essential. Council's Equality Officer available to
	to customer needs	plain English and language proof relevant documents