



**ARGYLL & BUTE COUNCIL**

**Housing Need & Demand Assessment Technical Supporting Paper 10**

**Core Output 4: Gypsy/Travellers Housing and Support Needs**

**October 2020**

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## **1. Introduction**

This report is an appendix to the Argyll and Bute Housing Need and Demand Assessment 2020 (HNDA). The purpose of the report is to provide the local and national context in relation to Gypsy/Traveller households and set out the steps taken to assess the current provision and future needs of Gypsy/Travellers in Argyll and Bute as per statutory guidance issued by Scottish Government.

## **2. Strategic Framework**

The Scottish Government's HNDA (2020) guidance sets out the procedure, purpose and requirements to ensure that the HNDA assessment is a "robust and credible" process which is used to inform local housing policy including the Local Housing Strategy and the Local Development Plan.

A core output of the HNDA process includes the requirement for Local Authorities to consider the current and future needs of particular groups including the site provision and the accommodation and support needs of Gypsy/Traveller households.

As defined in the Scottish Government's Local Housing Strategy Guidance, the term Gypsy/Traveller refers to a range of distinct groups including Romanies, Scottish, Irish, English and Welsh Travellers, who regard the travelling lifestyle as part of their cultural and ethnic identity. Whilst there is no consensus on a generic description, and the statutory term Gypsy/Traveller is used throughout the document, we are aware that some members of the community may take offence to the ethnic term 'Gypsy' and some would prefer to self-identify as 'Scottish Travellers'.

The Housing (Scotland) Act 2001 places a duty on Local Authorities to prepare a Local Housing Strategy (LHS) supported by the assessment of need and demand for local housing provision and related services in the local area. Argyll and Bute Council are currently developing their LHS for 2021-2026 and this report on local needs of Gypsy/Travellers will feed into the LHS action plan.

### **2.1 Argyll and Bute Local Context**

Following Council housing stock transfer, Argyll Community Housing Association (ACHA) became responsible for the management of the official Gypsy/Traveller sites within Argyll and Bute in 2006. ACHA are the only Registered Social Landlord in Scotland who manage Gypsy/Traveller sites. However, the Local Authority retain the strategic obligation to ensure that the needs of the Gypsy/Traveller community are met.

The ACHA Gypsy/Traveller Strategy 2019-2022 was updated in 2019. The aim of the ACHA strategy is to promote equality and to better understand the many issues around the provision of services for the Gypsy/Traveller community. To achieve this ACHA will work in partnership with Gypsy/Travellers and local and national bodies to see continual improvement in the services they provide for Gypsy/Travellers.

## 2.2 Registered Site Provision

There are currently two official Gypsy/Traveller sites in the Argyll and Bute area – Dunchologan, approximately 2 miles from Lochgilphead and Bayview, Benderloch which is approx. 6 miles from Oban.

The Torlochan site in Sandbank was closed in 2016/17 due to low demand which reduced the number of official pitches available in Argyll and Bute by 8. Following consultation and approval from their Board, ACHA have subsequently taken the decision to sell the Torlochan site.

### Dunchologan, by Lochgilphead

The site has 14 pitches; each pitch has access to an amenity block which includes a bath, shower, wash hand basin, and toilet. All the blocks are equipped with electrical connections, under-floor heating, and are fitted out with units for storage.

The current capacity at Lochgilphead site has been reduced by 9 units due to the recent changes to Site Licences and fire regulations relating to the spacing between caravans/trailers. All available pitches were let as at 31<sup>st</sup> March 2020.

### Bayview, Benderloch, By Oban

The site has 8 pitches; each pitch has access to an amenity block which includes a bath, shower, wash hand basin, and toilet. All the blocks are equipped with electrical connections, under-floor heating, and are fitted out with units for storage.

The current capacity at Bayview site has been reduced by 4 units due to the recent changes to Site Licences and fire regulations relating to the spacing between caravans/trailers. All available pitches were let as at 31<sup>st</sup> March 2020.

**Table 1: Total Site Provision 2015 and 2020 Comparison**

Site Name	Total Pitches as at 31 <sup>st</sup> March 2015	Occupied Pitches as at 31 <sup>st</sup> March 2015	Total Pitches *(number available for let) as at 31 <sup>st</sup> March 2020	Occupied Pitches as at 31 <sup>st</sup> March 2020
Torlochan*	8	0	0 / 0	0
Dunchologan	14	10	14 / 5	5
Bayview	8	7	8 / 4	4
<b>TOTAL</b>	<b>30</b>	<b>17 (57%)</b>	<b>22 / 9</b>	<b>9 (100%)</b>

\* Torlochan site in Sandbank closed in 2016/17 and site capacity is currently reduced at Dunchologan and Bayview

The ACHA average weekly pitch rent has been consistently well below the Scottish average over recent years. The average rent in 2015/16 for all three sites in Argyll was £42.13 per week compared to the Scottish average of £66 per week. The average 2019/20 rent in Argyll was £52.17 which is nearly 30% below the Scottish average of £73.25. (SHR ARC Indicator 31)

The Council has a strategic obligation and continues to support the upkeep of the official sites in the form of a grant award to ACHA from the Strategic Housing Fund. Grant levels for the last four years have been summarised:

**Table 2: Council Grant provision 2016/17 – 2019/20**

<b>Year</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19*</b>	<b>2019/20</b>	<b>4 year Total</b>
<b>Grant</b>	£39,660	£41,228	£31,001	£28,939	£140,828

\* Since 2018/19 Council Grant has been reduced to reflect the reduction in provision, including the closure of Torlochan site in Cowal.

### **2.3 Private Gypsy/Traveller Sites - Planning**

There are no private Gypsy/Traveller sites in the Argyll and Bute area.

Over the last 5 years neither the Local Authority nor the Loch Lomond Trossachs National Park Planning Departments in Argyll and Bute have received any applications for the development of private site provision for Gypsy/Travellers.

### **2.4 Travelling Showpeople**

Argyll and Bute does not have any authorised sites for Travelling Showpeople (who are defined officially as a distinct group in their own right) and the Council has not identified any households within this category during our research. The Guild for Travelling Showpeople were contacted in March and May 2020 to try and engage with this distinct group to identify if they had any unmet accommodation needs in our area. There was no response to our enquiry to date; and historic consultation with the Guild has consistently indicated that there is no unmet need or demand from this group.

### **2.5 Unauthorised Encampments**

There are periodically incidences of roadside stopping and unauthorised encampment reported across the Argyll and Bute area. These generally seem to be short stays by transient Gypsy/Traveller households and at the time of writing there is insufficient evidence to suggest any requirement for the provision of a transient site in Argyll and Bute.

#### Forestry and Land Scotland Information

The Forestry and Land Scotland (FLS) have reported that they experience unauthorised encampments on their land in various locations across Argyll and Bute, generally for short periods of time. These unauthorised encampments are not identified as a significant issue, and incidences are generally highlighted to FLS staff by a member of the public. Local Officers will try and engage with Gypsy/Travellers to encourage them to move on to a regulated site before they would begin any formal proceedings to evict.

There are two main car parks where FLS have recorded unauthorised encampments which are at Dunardry and Ach nabreac in the Mid Argyll area of Argyll and Bute. It is generally the same family group that attend these car parks and FLS staff have developed a relationship with them, and following engagement they generally leave of their own accord after 1 or 2 weeks.

**Table 3: Forestry and Land Scotland – Unauthorised Encampment Records**

<b>Achnabreac Car Park</b>	
April 2016	Travellers left of their own free will before formal proceedings were needed.
July 2016	Travellers left of their own free will before formal proceedings were needed.
April 2019	Sheriff's Officers served eviction notice
<b>Dunardry Car Park</b>	
June 2015	Travellers left of their own free will before formal proceedings were needed.
July 2015	Travellers left of their own free will before formal proceedings were needed.
April 2016	Travellers left of their own free will before formal proceedings were needed.

FLS have reported that they have experienced similar issues in other areas such as on Mull and north of Oban but these other sites are less frequent than the two in Lochgilphead.

#### Loch Lomond & Trossachs National Park

There have been no cases of unauthorised encampments reported in national park areas of Argyll and Bute.

## **2.6 Negotiated Stopping**

Following analysis of local and national data, the council does not believe that 'negotiated stopping' places are currently required in Argyll and Bute as unauthorised encampments are relatively rare. When there are occurrences, these are managed locally and the households generally move on quickly. The council will continue to monitor this situation and develop protocols with internal and external partners to make sure there is appropriate engagement with transient Gypsy/ Travellers and to ensure that their needs are being met and recorded in line with national guidance and good practice.

## **2.7 National Context**

The profile of the Gypsy/Traveller community has been given a high focus at national level following reviews by both the Scottish Government and COSLA over recent years.

### **2.7.1 Improving Gypsy/Traveller Sites: Guidance on minimum site standards and site tenants' core rights and responsibilities - May 2015**

The Scottish Parliament's Equal Opportunities Committee (EOC) 2013 report, Where Gypsy/Travellers Live, examined issues around the quality and quantity of Gypsy/Traveller site provision in Scotland. In light of this report, guidance on minimum site standards for these sites, together with the core rights and

responsibilities for tenants, were developed in 2015 as measures for Local Authority/Registered Social Landlord site providers to improve the quality of sites. The target for site providers to meet the revised minimum standards and issue tenancy agreements which reflect tenants' core rights and responsibilities was June 2018. These minimum site standards and indicators include:

1. Essential Fabric Standards

- Amenity blocks are structurally sound, with good quality foundations, floors, and walls;
- Pitches have an area of hardstanding, of suitable size and quality to tolerate weight of caravans (with contents), and cars or vans / light commercial vehicles. Suitable anchor points are provided, if necessary;
- Amenity block roofs are structurally sound, in good repair, and keep out water;
- Rising damp and penetrating damp are not present in amenity blocks;
- Appropriate arrangements have been made for foul and surface water drainage, including gutters and downpipes for amenity block roofs;
- Windows and doors of amenity blocks are of a good quality;
- Access roads, and roads and paths on the site, are of good quality.

2. Energy Efficiency

- Amenity blocks should meet an energy efficiency rating of band E or better

3. Facilities and Amenities

- The amenity block has a wholesome water supply, with adequate water pressure;
- The amenity block has a toilet available for the exclusive use of the occupants of the pitch;
- Amenity block fittings (including toilet, and any shower or bath) should be of a good quality;
- Amenity block kitchen fittings (such as storage cabinets and worktops) should be of a good quality;
- There should be a hot and cold water supply to amenity block sinks;
- There should be adequate electrical sockets in the amenity block.

4. Safety and Security

- There should be adequate food storage space in the amenity block;
- There are adequate and appropriately located carbon monoxide detectors and alarms;
- There are adequate and appropriately located smoke alarms/detectors. Site providers should also meet their duties under the Fire (Scotland) Act 2005;
- There is a safe electrical system, inspected once every 5 years;
- There is a safe gas/oil system (if used) and appliances. There is a gas inspection (if applicable) once a year;
- There is good quality lighting of common parts of the site;
- There are appropriate road safety measures in place for roads on the site.

## 5. Maintenance and Repairs

- Repairs are carried out in line with timescales set locally for repairs for social housing tenants;
- There are adequate and good quality drainage arrangements to allow rainwater to safely drain off the site;
- Common parts of the site are kept in good condition, including any common areas, paths, roads, and children's play parks.

## 6. Fair Treatment

- Tenants are treated fairly and with dignity by the site provider. Each tenant's individual needs are recognised, they are treated fairly and with respect, and receive fair access to accommodation;
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## 7. Consultation

- Gypsy/Travellers site tenants find it easy to communicate with the site provider, and get the information they need.

Section 2 of the guidance sets out core rights and responsibilities that the Scottish Government expect to be part of tenants' occupancy agreements with site providers. Previously there was little consistency in terms of tenancy agreements as each site provider adopted their own agreement in isolation. The updated guidance puts a requirement on site providers to ensure that their formal tenancy agreements now include details on: Fair treatment; Amenity Block Standards; Repairs; Ending a tenancy; Consultation; Information and Complaints; Responsibilities; Behaviour; Care of your pitch; and Leaving a pitch.

ACHA have undertaken improvement works on the registered sites in Argyll and Bute which currently meet the minimum site standards. However, it has been recognised locally and nationally that further works are required on both sites to improve the overall conditions and amenity space for residents.

### **2.7.2 Race Equality Action Plan 2017**

The Race Equality Action Plan was launched by Scottish Government in December 2017. This set out their commitment to mainstream equality. The action plan includes a specific section on Gypsy/Travellers to ensure equality by integrating their needs into policies such as health, education and social services.

A ministerial working group was also established at this time to take forward the cross-government actions to improve the lives of Gypsy/Traveller communities in Scotland.

### **2.7.3 Managing unauthorised camping by Gypsy/Travellers in Scotland: guidance for local authorities - April 2017**

The revised guidance for Local Authorities was published in 2017 as part of wider Scottish Government policy review following the commitment made in the EOC 2013 Parliamentary report '*Where Gypsy/Travellers Live*'. The updated guidance reflects the Scottish Government's longstanding policy position on unauthorised sites, which

is that “Gypsy/Travellers have a right to their traditional way of life, but that right must be exercised responsibly and with regard to the rights of others”.

The Scottish Government uses the term "unauthorised site" to describe “a site which has been established by Gypsy/Travellers without planning permission. Such sites will normally be in place for a number of days, but can sometimes be in place for longer”.

The guidance was produced to assist Local Authorities to either develop or update existing policies and strategies, and reassess their approach to responding to and managing unauthorised sites. The basic principles which should be followed are:

1. *Local Authorities should seek to manage unauthorised sites to minimise disruption for all concerned and ensure that any anti-social behaviour is tackled firmly, regardless of who the perpetrators are.*
2. *The same standards of behaviour should be expected from all members of the community, whether Gypsy/Travellers or the settled community, based on mutual respect and with regard to the rights and responsibilities of all those concerned.*

The Scottish Government have set out the general approach to unauthorised sites that they feel is appropriate for the management of sites and includes guidance on:

- Unsuitable locations
- Behaviour on a site
- Behaviour around a site
- Welfare needs
- Communication

There are recommendations on the expected approach and procedures that should be followed when dealing with unauthorised sites, which covers:

- Initial site visit
- Decisions on response to unauthorised site
- Unauthorised site on private land
- Events and other large gatherings by Gypsy/Travellers
- Waste disposal
- Regional co-ordination
- Transit Sites and Designated Locations

The case studies together with good practice examples in the guidance provide illustrations on the different approaches that can be used dependent on the size, location, and length of stay in the unauthorised site.

The roles and responsibilities of all those involved in unauthorised sites are set out in the guidance which pertains to: Gypsy/Travellers; Local Authority, Police Scotland; Crown Office & Procurator Fiscal Service (COPFS) and the Scottish Government.

As detailed in section 2.5 of this report, Argyll and Bute does not have any significant issues with unauthorised sites to date. However, we do require to update and review



existing approaches to develop and strengthen partnership working when instances of unauthorised sites are reported.

#### **2.2.4 Planning System: Gypsy/Travellers Action Plan 2019**

The Planning system can play a crucial role in ensuring that there is adequate, safe, and secure places for Gypsy/Travellers to stop or settle. The Scottish Planning Policy (SPP) published in 2014 required Councils to plan for the current and future needs of the Gypsy/Traveller community, and to involve the community in planning and decision-making which affects them.

The Scottish Government funded a project by PAS (formerly Planning Aid Scotland) to increase awareness of the needs of Gypsy/Travellers in accessing the planning system. PAS produced five Gypsy/Traveller planning guides which were published in April 2015 and aimed at Gypsy/Travellers, planning professionals, elected members, community councillors, and the media.

Following a review of Planning legislation and policy, in 2019 the Scottish Government published a ten point action plan to emphasis their commitment that everyone including Gypsy/Travellers should have a stronger voice in the planning system and guiding the future development of their places.

1. We will look at how we can improve the way we plan for Gypsy/Traveller sites Including the role of Housing Need and Demand Assessments (HNDA) and Local Housing Strategies and specifically we will ask that Local Authorities, through the HNDA, must consult all relevant stakeholders about their accommodation needs, including consultation with Gypsy/Travellers.
2. We will work with the Gypsy/Traveller community to support them to use community led design approaches in shaping development in their area.
3. We will require all planning authorities to alert us to any planning applications for Gypsy/Traveller sites to help us build an accurate picture of activity in the planning system.
4. We will commit additional resources to PAS (formally Planning Aid for Scotland), to provide dedicated support and advice to Gypsy/Travellers who are involved in the planning system.
5. We will update (as required) and adopt PAS advice on Gypsy/Travellers as Scottish Government planning guidance.
6. We will bring forward an amendment to the Planning Bill to ensure that planning authorities properly involve Gypsy/Travellers in planning the future of their places as part of further improvements to engagement in development planning.
7. We will meet with the conveners of local authority planning committees and raise awareness of the need to involve Gypsy/Travellers in planning.
8. We will raise awareness of the need to provide accommodation for Gypsy/ Travellers directly with Heads of Planning Scotland at our annual meeting in November.
9. We have commissioned research to find out more about how the planning system currently addresses the need and demand for Gypsy/Traveller sites
10. We will have a wider conversation on Gypsy/Traveller sites and the National Planning Framework, following the completion of scrutiny of the Planning Bill

The quality of our places matters to all of us and the Planning framework plays a crucial role to ensure that the needs of our Gypsy/Traveller communities are understood and met.

### **2.7.5 Improving the Lives of Scotland's Gypsy/Travellers (2019-2021) / Action Plan**

In 2019, the Scottish Government and COSLA undertook a significant piece of research which considered the needs of Gypsy/Travellers across Scotland. Part of this research was to develop an action plan to consider and better meet the accommodation needs and aspirations of Gypsy/Travellers and support their right to travel.

The research evidenced that Gypsy/Travellers have often missed out on improvements that the majority of people and communities across Scotland have enjoyed. As well as seeing their traditional lifestyle eroded, the research identified that Gypsy/Traveller communities experience poorer outcomes in terms of living standards; education; health; and employment. Many Gypsy/Traveller households can often face extreme and persistent stereotyping and hostility as they go about their lives.

It was acknowledged across the Scottish Government, the Scottish Parliament, COSLA, and by the 32 Scottish Local Authorities that there is evidence of injustices faced by Gypsy/Travellers. A national partnership commitment has been agreed for the need for action to improve the lives of Gypsy/Travellers and for changes to be lasting.

The joint action plan was informed by the outcome of the research and demonstrates the firm national commitment to make things right. The action plan sets out the partnership approach to deliver better outcomes and seeks to improve the lives of our Gypsy/Traveller communities by delivering meaningful change over the next two years.

Developed in partnership with the advice, support, and challenge of advocates, and Gypsy/Traveller communities, as well as being informed nationally and locally by those who are responsible for developing and delivering policies and services; the action plan has ongoing political leadership and is a significant document in tackling deep-rooted inequalities and delivering a fairer Scotland.

The focus of the action plan is on five key areas which were identified by Gypsy/Traveller communities as most important to them and where evidence shows that improvements are required to meet the needs of the community. Strong partnership working and on-going, proactive engagement with Gypsy/Traveller communities will be key to delivering successful outcomes both nationally and locally. The five key commitments of the Action Plan are:

#### **1. Provide more and better accommodation**

- Ensure the needs of Gypsy/Travellers are appropriately and collectively resourced.
- Ensure we understand the accommodation needs and preferences of Gypsy/Travellers to inform future provision.

## **2. Improve access to public services**

- Work with Gypsy/Traveller communities to raise awareness of rights and entitlements.
- Ensure that our public services are responsive to Gypsy/Travellers needs and preferences.
- Test and share effective approaches to improving experiences of health and education services.

## **3. Better incomes in and out of work**

- Help to maximise incomes and increase uptake of social security.
- Support Gypsy/Travellers to overcome barriers to work, and in-work poverty.
- Take action to reduce daily living costs.

## **4. Tackle racism and discrimination**

- Provide leadership to challenge racism and discrimination.
- Promote Gypsy/Travellers rights.
- Recognise and value Gypsy/Traveller history and culture.

## **5. Improve Gypsy/Traveller representation**

- Strengthen community development and engagement.
- Work with Gypsy/Travellers to improve their involvement in national and local decision-making.
- Support a national Gypsy/Traveller “movement for change”.

Argyll and Bute Council endorses these national principles and is committed to supporting the delivery of the action plan which will require close partnership working across professional stakeholders and proactive engagement with the Gypsy/Traveller community to ensure that actions are undertaken that best meet local needs.

A Ministerial and COSLA Working group has been established to monitor progress of the action plan which will involve engagement with Gypsy/Traveller communities. The group will discuss emerging opportunities, and look at ways to find solutions to any barriers or challenges to delivery.

To support Local Authorities and partners to improve Gypsy/Traveller sites and accommodation, the Scottish Government has committed £2million to help fund improvements to Gypsy/Traveller accommodation and sites, with the remaining funding going towards third sector children’s education projects and health and social care initiatives. This funding provides an opportunity for responsible organisations to engage with the community and make improvements to sites over and above the minimum site standards. Monies cannot be spent on meeting minimum site standards or to meet fire safety standards.

The allocation for Argyll Community Housing Association which was received via Argyll and Bute Council in March 2020 amounted to £108,726. The Scottish Government want communities to benefit from this funding immediately, by March 2021; or where this is not possible, and evidence of community engagement and planned work for delivery by June 2021 is available, this will be accepted.

The Council are working closely with ACHA to take forward options for short-term improvements to the sites. The Gypsy/Traveller community and MECOPP will be consulted to ensure that changes will make meaningful differences for residents. Further consultation will be undertaken in early 2021 regarding longer-term plans for site improvements.

### **2.7.6 Evidence Review: Accommodation Needs of Gypsy/Travellers - October 2020**

The Scottish Government published the '*Evidence Review: Accommodation Needs of Gypsy/Travellers report*' late in October 2020 as our research findings were being concluded. The report provides a review of academic and grey literature in relation to the accommodation needs and experiences of Gypsy/Travellers in Scotland and the UK over the last 20 years. The research forms part of a larger review on the accommodation needs of minority ethnic groups being undertaken to meet the housing research actions in the *Race Equality Action Plan 2017-2021*.

The report acknowledges the lack of national evidence bases and accurate measurements of housing need and demand for the Gypsy/Traveller community. In particular, the quantitative data on the population of Gypsy/Travellers in Scotland is limited and dated which is a key issue for policy development.

A large body of evidence reviewed by researchers highlighted the discrimination and harassment faced by Gypsy/Travellers in Scotland. For example, in the Scottish Social Attitudes survey in 2015, 31% respondents indicated that they would be unhappy if close relative married a Gypsy/Traveller and 34% viewed Gypsy/Travellers as unsuitable to be a primary school teacher.

Similar to our own findings, the report highlights that there is some evidence that many Gypsy/Travellers feel forced into conventional housing due to health, poor quality accommodation, or lack of site provision. Studies also suggest that the move to housing can be complex, with many Gypsy/Traveller households experiencing 'cultural aversion' a struggle to adapt to living in conventional housing which can lead to higher levels of anxiety and depression within the housed population.

The inadequacy of site provision emerges as a theme throughout the literature that has been reviewed and there is a clear indication that there is a lack of understanding and awareness of the Gypsy/Traveller culture across services. The report references research undertaken by Minority Ethnic Carers of Older People Project (MECOPP) in 2015, where it was reported that Gypsy/Travellers felt that they were being blamed for their own problems on the basis of their ethnicity, rather than service provision being inappropriate or inflexible.

The accommodation aspirations of Gypsy/Travellers has been considered in the report. Studies reviewed denote that for the majority the preference would be for mobile/chalet homes on a fully serviced site with adequate space on pitches to allow for separate sleeping arrangements for larger families if required. One study which looked at older Gypsy/Travellers accommodation experiences, emphasised the need for flexibility in accommodation provision so that it is more flexible and can adapt to changing circumstances as households age. There are areas of good practice identified for

engagement and the design of Gypsy/Traveller sites including some specific Scottish examples which is a useful resource for future local consultation for proposed site improvements and upgrades.

Whilst this report was not taken into account during our research, the overall outcomes of the report have similar themes and findings, which corroborates many aspects of our local research with the Gypsy/Traveller community.

### **3. Review of secondary data**

A desktop review has been undertaken to consider the secondary and primary data available in relation to Gypsy Traveller households in Argyll and Bute.

#### **3.1 *An Accommodation Needs Assessment of Gypsies/Travellers in West Central Scotland report by Craigforth – June 2007***

Craigforth were commissioned to undertake a wide-ranging piece of research looking at accommodation needs of the Gypsy/Traveller community in 11 Local Authority areas including Argyll and Bute back in 2007. This provides a historic baseline of evidence for reviewing progress over time.

At this time there were 3 Gypsy/Traveller sites in Argyll and Bute – Torlochan, Dunoon; Dunchologan, Lochgilphead; and Ledaig (now known as Bayview), Oban. The report identified that there were improvements and upgrading required to all the sites in Argyll and Bute and provision needed to be made for ongoing cyclical maintenance. The report also highlighted the need to re-establish good relationship between landlord and site residents on Oban site at that time, as well as continuing to develop good relationships at other sites.

Whilst this report is over ten years old, a review of available local and national data indicates that many of the original issues and site improvements that were recommended remain outstanding.

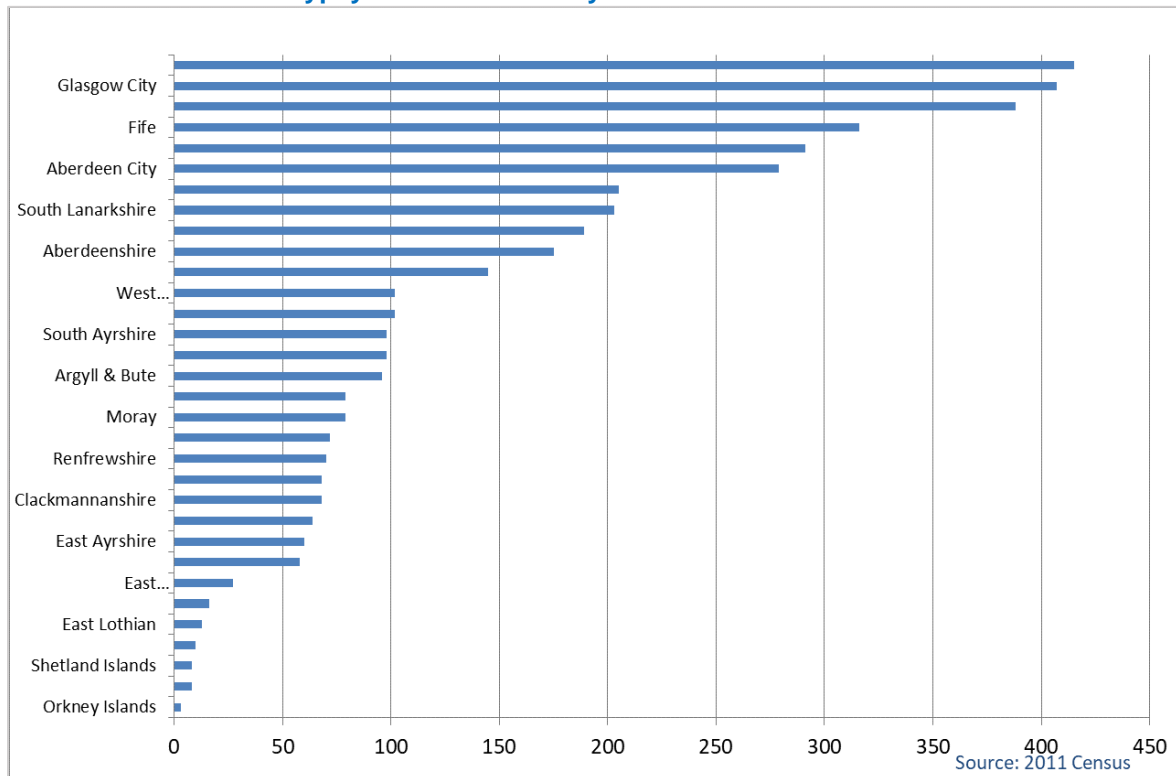
#### **3.2 *Census 2011***

The 2011 census was the first census in Scotland to include an option for Gypsy/Travellers in the ethnicity category. This enabled baseline data for Gypsy/Travellers to be collated across a number of areas including: accommodation; health; education; and employment. Whilst the census data has improved the national dataset for Gypsy/Travellers, it does not provide definitive numbers as it is highly likely that some households would prefer not to identify themselves as Gypsy/Travellers. There is also only the option for 'White: Gypsy/Traveller' which may also exclude some households.

Only 4,200 people in Scotland identified themselves as 'White: Gypsy/Traveller' in the 2011 Census across all housing types. Following consultation with those who work with Gypsy/Travellers the Scottish Government estimate that this number is under reported and there is more likely to be between 15,000 and 20,000 across Scotland.

The reported figure for Gypsy/Travellers in Argyll and Bute was **96**. When cross referenced against ACHA's annual Gypsy/Traveller household count for 2012-13 (2011-12 data was unavailable) the total number of people on registered sites was **61**. This data supports the view that the Census is unlikely to portray a fully accurate account of the actual number of households who identify as Gypsy/Travellers in the Argyll and Bute area, as the 61 figure only accounts for those living on the registered sites. It is expected that there is a wider Gypsy/Traveller population occupying mainstream housing or other forms of accommodation in this area, out with the designated sites.

**Chart 1: Census 2011 Gypsy/Traveller count by Council area**



Source: 2011 Census

Analysis of the 2011 Census results confirms that, as might be expected, compared to the general population in Scotland, Gypsy/Travellers were:

- Much less likely to own their home;
- Much more likely to live in a caravan;
- Much more likely to live in overcrowded accommodation; and
- More likely to have no central heating.

### **3.3 Gypsy/Traveller Sites in Scotland – April 2019**

The Scottish Government undertook a study to collate data on all Gypsy/Traveller sites across Scotland. The report published in April 2019 identified that at that time there were **54** Gypsy/Traveller sites in Scotland with a total provision of **613** pitches. At that time there were also 25 private sites and 29 public sites.

The public sites are managed by 20 local authorities/RSLs across Scotland providing a total of **397** active pitches. This was a reduction of 62 pitches since 2008 (14%) although the supply of active pitches has largely remained unchanged since 2009. At the time of the study, 351 out of the 397 public pitches were currently let, equivalent to an occupancy rate of 88%. The number of occupied pitches (351) suggests that the 2011 Census may have under-counted Gypsy/Travellers living on public sites as this only recorded 259 Gypsy/ Traveller households living in caravan or mobile accommodation. The study reported that there was a total of 90 households that were currently registered on public site waiting lists across Scotland and that 9 households had been turned away in the last year.

The study also identified that there was **406** locations used for unauthorised Gypsy/ Traveller encampments over the preceding 3 years across Scotland.

### **3.4 *Argyll and Bute MSP / Round Table Discussions regarding local site provision 2018 - 2020***

At a local level, there have been various meetings in Argyll and Bute in recent years, regarding the need to improve standards at the Gypsy/Traveller sites at Dunchologan and Bayview. These meetings were convened initially by Michael Russell, MSP and involved representatives from ACHA, Argyll and Bute Council, Scottish Government, Cosla, MECOPP and the Gypsy/Traveller community themselves. There was also a dedicated site visit to Dunchologan, arranged in September 2019, which allowed representatives to see first-hand the condition of site and understand the issues experienced by residents.

The most recent round table meeting in December 2019 again brought together all those involved and saw a positive step forward. The meeting evidenced a genuine willingness between all parties to work with the Gypsy/Traveller community to improve site standards and review accommodation provision. ACHA agreed at the meeting to take forward specific feasibility studies for both local sites in conjunction with residents and wider Gypsy/Traveller community. Argyll and Bute Council Housing Services and MECOPP will play an active role in supporting the community through this process.

## **4. Primary Research, Consultation & Stakeholder Engagement**

There has been a variety of methods used to assess the needs of Gypsy Travellers in Argyll and Bute in recent times.

### **4.1 *MECOPP***

Argyll and Bute Council has undertaken HNDA engagement with the Gypsy/Traveller community supported by the Minority Ethnic Carers of Older People Project (MECOPP) who have been a key link for accessing and facilitating direct engagement with this core group.

MECOPP are a support agency who work specifically with Gypsy/Traveller communities in rural and urban areas of Scotland. They use multi-dimensional

community development approaches – including outreach work, community-led research, film-making, casework, and training, working with partners from the statutory and voluntary sectors to develop their support to respond more appropriately to the needs of this community.

The key five MECOPP project outcomes are:

1. Increased local and national knowledge of the pattern, nature and extent of informal caring within Gypsy/Traveller communities in Scotland;
2. Increased capacity of partners to respond more appropriately to the needs of informal carers from the Gypsy/Traveller community;
3. Increased knowledge of, and confidence in, carer support services amongst Gypsy/Travellers;
4. Quantifiable improvements in the physical, emotional and financial health of individual Gypsy/Traveller carers;
5. Increased knowledge about the mental health and wellbeing of Gypsy/Traveller carers in Edinburgh & the Lothians.

#### **4.2 Twice-Yearly Gypsy/Traveller Count**

The Council oversees a twice-yearly Gypsy/Traveller count which Argyll Community Housing Association submits on 31<sup>st</sup> March and 30<sup>th</sup> September each year. This provides details on the number of official sites and pitches across the area together with the number of occupied pitches and details of households residing there.

Over the last 5 years there has been a decline in the occupancy rates and number of pitches available across all the Argyll sites. The following tables provide a snapshot on the occupancy as at 31<sup>st</sup> March on each site.

**Table 4: Ledaig/Bayview Occupancy 2017-2020**

<b>LEDAIG / BAYVIEW</b>	<b>31st March 2017</b>	<b>31st March 2018</b>	<b>31st March 2019</b>	<b>31st March 2020</b>
<b>Total number of pitches:</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>
<b>Total number of pitches occupied:</b>	<b>8</b>	<b>6</b>	<b>4</b>	<b>3</b>
<b>Total number of pitches unoccupied and available:</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>
<b>Total number of pitches unoccupied and not available:</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>5</b>
<b>Total number of households on site:</b>	<b>7</b>	<b>6</b>	<b>4 (+1 *)</b>	<b>3</b>
<b>Total number of people on site:</b>	<b>21</b>	<b>10</b>	<b>5 (+1 *)</b>	<b>5</b>

\* Unauthorised household

Source: Council/ACHA Twice Yearly Count



**Table 5: Dunchologan Occupancy 2017-2020**

<b>DUNCHOLOGAN</b>	<b>31st March 2017</b>	<b>31st March 2018</b>	<b>31st March 2019</b>	<b>31st March 2020</b>
<b>Total number of pitches:</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>14</b>
<b>Total number of pitches occupied:</b>	<b>8</b>	<b>9</b>	<b>7</b>	<b>6</b>
<b>Total number of pitches unoccupied and available:</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total number of pitches unoccupied and not available:</b>	<b>2</b>	<b>5</b>	<b>7</b>	<b>8</b>
<b>Total number of households on site:</b>	<b>8</b>	<b>11</b>	<b>7</b>	<b>6</b>
<b>Total number of people on site:</b>	<b>26</b>	<b>35</b>	<b>14</b>	<b>13</b>

Source: Annual Council/ACHA Twice Yearly Count

### **4.3 ACHA's Annual Satisfaction Surveys**

ACHA currently monitor their performance by undertaking an annual satisfaction survey with residents on their Gypsy/Traveller sites. Analysis of the survey results over the last few years indicates positive satisfaction levels but with some areas for improvement. A snapshot of some of the key survey questions asked and response rates in relation to services ACHA provide and site provision over the last 5 years are summarised in the following table. There are slight variations in the questions asked over the years resulting in minor inconsistencies in wording of questions.

The surveys offer an opportunity for residents on registered sites to provide feedback on the services and accommodation provided. However, a degree of caution may be required, since these surveys are undertaken face to face by ACHA staff and consequently the results may not reflect an accurate picture where households do not want to raise or report a particular issue to staff.

In addition to their communication with households through on-going site management, ACHA also produce an annual Gypsy/Traveller newsletter which is published on their website and is also available in paper or audio formats on request.

#### **4.3.1 Scottish Housing Regulator -Registered Social Landlord ARC Returns**

ACHA are required to report satisfaction levels in their annual ARC return submitted to the Scottish Housing Regulator (SHR). The SHR monitors the tenant satisfaction levels of all Scottish landlords and reports on these annually. ACHA perform exceptionally high reporting 100% satisfaction levels compared to average 71% satisfaction level in 2019/20 across Scotland.

**Table 6: Snapshot of ACHA Satisfaction Survey Results from 2015 - 2019**

ACHA Key Survey Questions	Year	Number of responses	Response percentage				
			Very satisfied / Good	Fairly satisfied / Good	Neither satisfied nor dissatisfied	Fairly dissatisfied / Poor	Very dissatisfied / Poor
How good do you feel ACHA is at keeping you informed about their services and decisions?	2015	7	42.9%	14.3%	0	28.6%	14.3%
	2016	12	50%	50%	0	0	0
	2017	12	50%	42%	0	0	8%
	2018	10	30%	70%	0	0	0
	2019	6	66%	17%	17%	0	0
Taking into account the accommodation and the services ACHA provides, do you think that rent for this pitch represents good value for money?	2015	7	14.3%	28.6%	28.6%	0	28.6%
	2016	12	41%	17%	0	17%	25%
	2017	12	8%	50%	0	25%	17%
	2018	10	20%	70%	10%	0	0
	2019	6	83%	17%	0	0	0
Thinking about when you moved in, how satisfied or dissatisfied were you with the standard of your pitch?	2015	2	0	0	50%	0	50%
	2016	6	50%	50%	0	0	0
	2017	4	50%	25%	25%	0	0
	2018	3	0	67%	0	0	33%
	2019	1	0	100%	0	0	0
Overall, how satisfied or dissatisfied are you with ACHA's management of Travelling Persons site? <i>ARC Indicator 37</i>	2015	7	14.3%	42.9%	14.3%	14.3%	14.3%
	2016	12	59%	25%	8%	8%	0
	2017	12	42%	50%	0	0	8%
	2018	10	50%	50%	0	0	0
	2019	6	50%	50%	0	0	0

Source: ACHA Annual ARC Returns

The Scottish Governments 'Evidence Review: Accommodation Needs of Gypsy/Traveller report' has also taken into account rent and satisfaction levels in public Gypsy/Traveller sites across Scotland. The findings note that as landlords are allowed flexibility in how 'satisfaction level' data is collected, it is unclear how representative the results are for all service users of a site or how comparable this data is. ACHA staff currently undertake their annual satisfaction surveys. Consideration should be given to the process of undertaking customer satisfaction surveys going forward to ensure they reflect independent analysis, options could include appointment of an independent organisation to undertake.

A study conducted by the National Panel of Tenants and Service of Users on behalf of the SHR in 2018/19 interviewed 55 households across 10 different Gypsy/Traveller sites. The findings of this study identified that the majority of participants had concerns regarding the condition of their site, cleanliness and lack of investment. Even where improvements had been made to meet minimum site standards, the study found that concerns still persisted in relation to condition of amenity blocks, facilities, heating and ventilation. These findings accord with the outcomes of our research and other studies referred to in the report, and evidences that there similar dissatisfaction levels across other sites and not just those in Argyll and Bute.

#### **4.4 Gypsy Traveller Focus Group Session**

An Argyll and Bute Council Housing Officer facilitated a Gypsy/Traveller focus group session on 7<sup>th</sup> November 2019 with support from MECOPP staff. MECOPP identified local residents within the sites and the wider community who had an interest in participating and issued the invite.

A briefing paper was created to provide attendees of the focus group with back ground information and to outline the context of the local Housing Need and Demand Assessment and how this document is produced and feeds into wider strategic objectives. Given the current high level profile of Gypsy/Traveller communities at both local and national level, this briefing information was important so that we could distinguish between the different work streams (for example - site standard review, national action plan and the HNDA process)

A Gypsy/Traveller survey was produced (see [appendix 1](#)) which incorporated many elements from the recent general HNDA Household survey and also took account of best practice from previous surveys which have targeted this community by external organisations such as Craigforth consultants. As this was the first time that we had used the survey, the focus group were asked to provide their views on the questions to ensure that they were clear, meaningful and captured all elements that we should be taking into account. Based on this feedback some minor amendments will be made for future ongoing engagement with the community.

The focus group was attended by ten Gypsy/Traveller households from the Lochgilphead and Oban areas of Argyll and Bute. Six surveys were completed on the day. A further four questionnaires were completed with assistance from MECOPP and returned by post. The group were very interactive and as well as completing the HNDA questionnaire, identified a range of issues and problems that they felt were distinct to the community and required to be addressed.

A further session was due to be held in Oban in February 2020 to allow those unable to attend the first session to participate but due to winter weather on the day it had to be cancelled. The Covid-19 restrictions in place from March 2020 have meant that no further round table sessions could be arranged to inform the current phase of the HNDA process, however having established this effective stakeholder network, consultation and engagement will continue over the life of the next LHS.

### Key Site Issues

There have been a number of issues identified with the current Gypsy/Traveller site facilities both from regulatory standard perspective and also from the community themselves through the focus groups and roundtable discussions.

- There is need for further investment/upgrading of both sites overall
- Improvements required to access road at Dunchologan due to poor condition, lack of passing spaces and no lighting
- Lack of public transport / bus stop near to sites – unsafe for residents to access by public transport
- More open space between units and pitches
- Improvements to the environment and amenity of the sites
- The need to sustain and enhance a more positive relationship between landlord (ACHA) and site residents

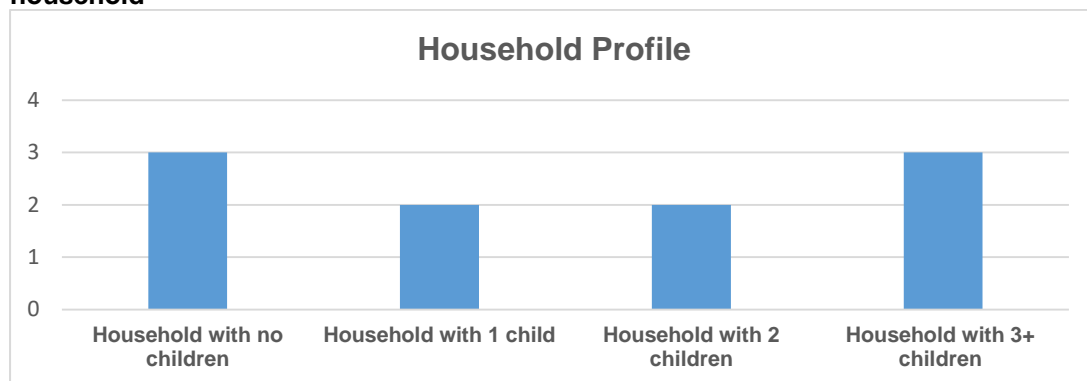
### **4.5 Gypsy/Traveller Survey Results**

The completed Gypsy/Traveller surveys have been analysed to identify key issues, needs, and trends within local Gypsy/Traveller community. The survey included questions on household profile; current accommodation; site provision; future accommodation needs; and access to services/support. The keys findings for each element have been summarised and reported below.

#### Household Profiles

The household profiles for each survey returned is detailed in Chart 1 below. The majority of households have one or more children. In addition, it was identified that one of these households consisted of a combination of more than one family.

**Chart 1: Gypsy/Traveller Survey Question - Please tell us about the members of your current household**

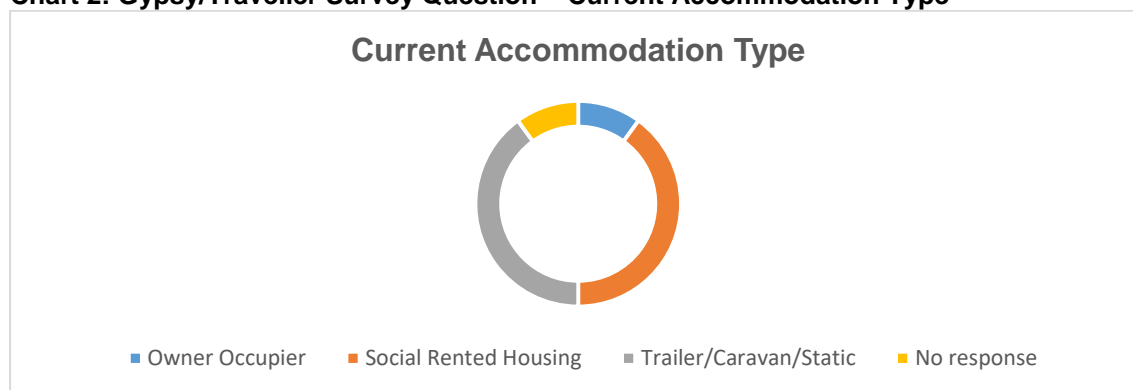


Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20

#### Current accommodation

Respondents were asked about their current housing tenure and how long they had resided there. There was a mix of responses with most living on Gypsy/Traveller site or in social housing. The length of residency ranged from one year upwards, with most households occupying their current accommodation for 3-4 years.

**Chart 2: Gypsy/Traveller Survey Question – Current Accommodation Type**



**Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20**

**Chart 3: Gypsy/Traveller Survey Question – How long have you stayed in current accommodation?**



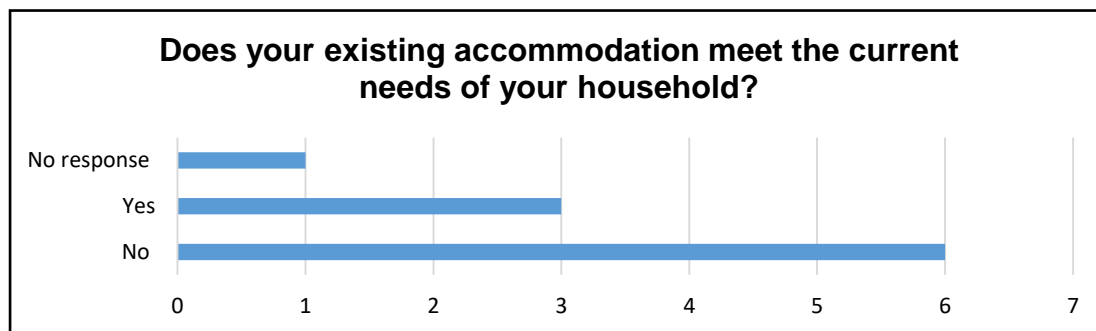
**Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20**

With no public funding mechanisms in place to help Gypsy/Traveller households to replace privately owned accommodation, the age and condition of caravan/static and trailer accommodation was a key concern. Those participants that resided on Gypsy/Traveller site reported that units were over 10 years' old and required repair. Only one household had made provision to consider future replacement.

The survey asked for households to identify if their existing accommodation was adequate to meet their current housing needs. There was a mixed response with the majority of participants stating that current accommodation did not meet their needs. The reasons cited varied and many related to individual needs of the household such as overcrowding; medical reasons; and as households get older accommodation will no longer meet needs. However, there was some significant responses which highlight the cultural and support needs of Gypsy/Travellers and their aspirations to live within their community and follow traditional beliefs and lifestyles. Affordability of replacing existing accommodation was a key factor, as well as improving site standards. Some of the most pertinent comments included:

- Current accommodation not fit for habitation, not wind and water tight, need go outside to wash and use toilet despite having mobility issues;
- Can't afford to replace caravan;
- Would prefer to be on Gypsy/Traveller site but had to move due to poor conditions and unable to afford to replace caravan;
- Forced into permanent housing due to poor site conditions and being subjected to anti-social behaviour;
- Additional room required as children too old to share. Cultural beliefs make it inappropriate for children to be sharing.

**Chart 4: Gypsy/Traveller Survey Question – Does your existing accommodation meet the current needs of your household?**



**Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20**

In addition, participants were asked if their existing accommodation had adequate facilities to meet their current needs. **50%** responded that their existing accommodation did have adequate facilities. For those who felt that their accommodation did not, reasons ranged from:

- Chalet has no facilities
- Adaptations required
- Lacks running water and toilet
- Mobility issues.

None of the participants reported having another home/location that they regularly used, although five households stated that they still go travelling. Some of the reasons cited for the pattern of travelling changing, or for no longer regularly travelling, were:

- Not for many years due to being housed
- Lifestyle changes, family living needs
- Struggle since put in house – nowhere to store caravan
- Family feel closed in, being stuck in a house

Those households who continue to travel generally try and get away a few times a year. They are normally unlikely to travel within the local authority area: most travelled within Scotland, but others travel further, including to England and Ireland.

When travelling, the majority reported using road-side stopping and alternative private/official Gypsy/Traveller sites. No households reported use of any other sites

in Argyll and Bute, but there was an awareness of roadside stopping in Appin and Mull.

Participants were asked a number of questions in relation to current site provision within Argyll and Bute. There was no evidence of Gypsy/Travellers living in private sites in the area.

There was a consensus in responses that there is **not** enough site provision in the area; only one respondent felt there was sufficient supply. Discussions at the focus group indicated that there was a need for additional site pitches. A number of comments were also made in survey responses regarding current site provision:

- No - not enough for everyone; poor quality pitches
- No - Dunoon shut; no letting on other sites
- No - Dunoon closed, but there is demand and ACHA are not letting pitches
- No - there are enough travellers but no one wants to live on sites due to bad reputation / run down / poor facilities / poor location

We asked households about the 'best' and 'worst' aspects of the local sites and what they would 'change'. Responses are set out in the table overleaf. Unsurprisingly the 'best' things about the sites relate to the freedom to follow their own way of life and being next to family and the Gypsy/Traveller community. Location, privacy and peace were also identified as advantages for some respondents.

However, the comments received indicate strong feelings of dissatisfaction in relation to the local site standards and amenities. There are a number of recurring comments in relation to the worst aspects of the sites and what should be changed.

**Table 7: Summary of the responses to the best, worst and things that would change on sites**

<b>BEST THINGS ABOUT SITE</b>	<b>WORST THINGS ABOUT SITE</b>	<b>WHAT WOULD YOU CHANGE ABOUT SITE</b>
freedom of living in caravan own way of life	pitch sizes / amenities / facilities for young & old	bigger site / more efficient for families / facilities for everyone's needs
peace not getting harassed	size pitches / condition site / lack of facilities	larger pitches for 2 caravans bigger families / more amenity space
location only good thing	whole site needs upgrade / access road disgrace / bad tenants	everything - all in Q3 whole site needs upgrade / access road disgrace / bad tenants
being next to family / other travellers	size pitches / amenity block - facilities / roads / drainage	Everything - size pitches / amenity block - facilities / roads / drainage
When lived on site - being beside family and own people / not being trapped in house	condition of Dunchologan site unliveable	all site - road access, bushes overgrown / lighting
privacy but that's all	site terrible / amenity block cold and damp / expensive to heat / no communal space / no playpark / neglected and run down	bigger pitches / plumbed water supply / washing green / security / considerate allocations / help replace caravans / tenants groups & meetings
being close to family and my community	size pitches / amenity block / road / cost / location / level of site / drainage / no plumbing or facilities too	everything
being with community and family	site should be condemned - it's a disgrace	bulldoze and start again - bigger pitches / running water / better road / better management / bus service / community space / green area / washing green / wooden fences - not horrible metal ones
	everything - like a prison camp / very run down	

**Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20**

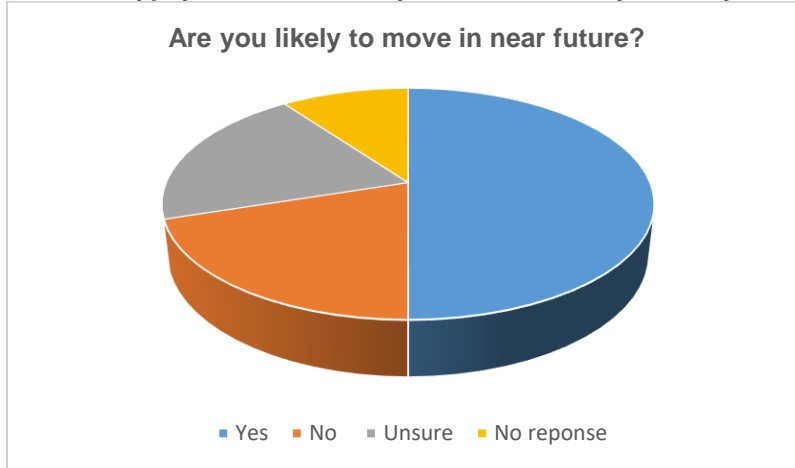
These independent, objective responses provide an important corrective to the results of the formal ACHA Satisfaction Survey, summarised earlier in this report.



## Future accommodation needs

Half of respondents advised that they would be likely to move in the near future; three were unsure and two existing site residents have no plans to move.

**Chart 5: Gypsy/Traveller Survey Question – Are you likely to move in near future?**

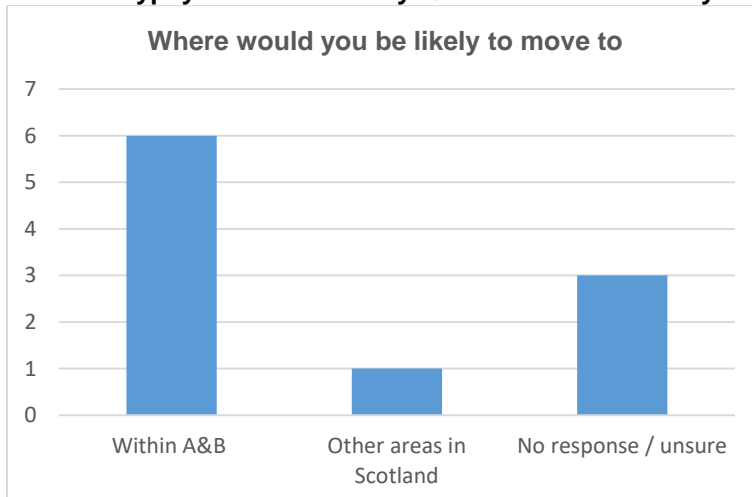


**Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20**

Some additional comments were received: in one instance the household feels they can't continue to live much longer as they are, due to poor site conditions; and another noted that if site conditions are improved they would want to move back to Gypsy/Traveller site.

When asked where they would be likely to move to, the majority stated within the Argyll and Bute area.

**Chart 6: Gypsy/Traveller Survey Question – Where are you likely to move to?**



**Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20**

The type of accommodation that they would like to move to varied, with a few respondents selecting more than one accommodation option. The most popular selection was a move to an Authorised Gypsy/Traveller site.

**Chart 7: Gypsy/Traveller Survey Question – What type of accommodation would you be likely to move to?**



**Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20**

Participants were asked an open question about what the main reasons would be for them choosing to move. The responses varied, with some providing brief responses and others listing a number of reasons.

These responses are summarised below. Key themes include the site conditions and impact on health and well-being. There are a number of responses that highlight cultural issues and the impacts of not staying near family or the wider Gypsy/ Traveller community.

**Main reasons why you would chose to move?**

- Family / health / lots different reasons
- Small space in house - hard to cope
- Family shouldn't need stay where they don't want to be
- Condition of site
- If site was more modern and fit for purpose would move there instantly
- To move back to site / feel trapped and stuck in house / health suffering due to giving up lifestyle
- Condition of site / lack of ACHA interest to fix / background checks - antisocial behaviour
- Feel isolated cut off from my family in current home

We also asked participants if there were any barriers stopping them from being able to move. Costs of new trailer, transport, site standards and family needs are some of the most common responses.

## **Are there any barriers stopping you from being able to move?**

- School - hard to leave permanent home
- No bigger houses / unable to get a pitch on Gypsy/Traveller site
- No suitable buses
- Can't afford new trailer / need two trailers accommodate family / pitches too small
- Don't want leave elderly family
- Dunchologan site is too run down and lacking facilities
- Can't afford to buy new trailer to live in
- The housing system - have 200 points, home is BTS and disabled household but cannot get house

There was an open questions asking respondents if there was likely to be any new emerging housing needs from their household, i.e. children wanting to move to independent accommodation. Discussions at the focus group around this topic revealed that where practical and possible, many families prefer to remain as one household or live in close proximity to each other. The information from the survey responses indicated that health reasons are likely to be the biggest factor for emerging or changing needs over time, such as requirements for adaptations or alternative accommodation; whilst only one respondent was likely to have new households forming at this time due to age of children.

- Children have mobility and learning problems - may need adaptations or alternative accommodation in future
- Yes - potentially older child in few years
- As health deteriorates may need adaptations
- My health condition will get worse

## Access to Services/Support

The survey asked households about their experiences of accessing services/support and if they encountered any problems. Many respondents indicated that they did encounter problems accessing these services but did not provide further details. Where information was obtained, this has been noted in the following table. The majority of respondents recorded experiencing issues with either accommodation, health services, education/employment and amenities, or a combination of factors.

In terms of accommodation, the bins, lighting, road and lack of stopping place or public transport were key issues for those who provided comments. In relation to health, access to dentist and transport were reported as problems. Barriers experienced with education/employment include literacy, racial barriers and bullying. Accessibility and transport generally are barriers for accessing amenities.

**Table 8: Summary of the responses regarding the barriers to accessing services**

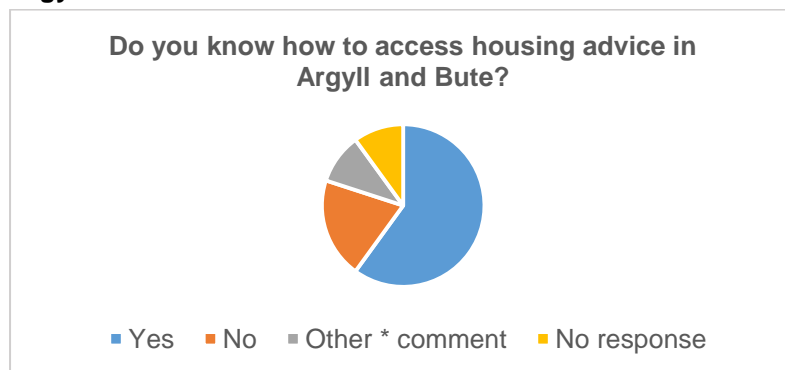
<b>Accommodation</b>	<b>Health</b>	<b>Education / Employment</b>	<b>Amenities</b>
Yes - no details <i>x3 responses</i>	Yes - no details <i>x5 responses</i>	Yes - no details <i>x3 responses</i>	Yes - no details <i>x2 responses</i>
Yes – bins, road blocked for 2months, no stopping place for bus	Yes - dentist	Yes - employment can't read	Yes - struggle with transport and getting to shops etc
Yes - bins not collected / no lighting / no public transport	Yes - need transport	Yes - employment	Need own transport to access
No - bin sometimes problem	Yes - health can't do anymore for me	Yes - racial barriers	Living in village – hard for shopping etc
No - but support from MECOPP		Bullying	

Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20

This section of the survey also asked participants if they had any unmet support needs. Only two comments were received: one reported electricity costs are high and the other was a household with two children whose medical needs were not met. (At the focus group, information was provided to participants about the dedicated Housing Occupational Therapist who supported households with particular housing needs, and it was advised that referrals could be made for an assessment. Contact details were sent to MECOPP Support staff for information/dissemination).

To get an understanding of awareness levels, participants were asked if they knew how to access housing advice in Argyll and Bute. Over half of the respondents were aware, however a number were not.

**Chart 8: Gypsy/Traveller Survey Question – Do you know how to access housing advice in Argyll and Bute?**



Source: Argyll & Bute Council Gypsy/Traveller Survey, 2019/20

\*One comment was received in relation to obtaining appropriate housing advice:  
“Get advice from MECOPP - not offered housing advice or support despite problems - everyone has turned blind eye”.

#### Other – Open Text Survey Question

The final section of the survey asked participants to let us know about any other factors which affected their housing situation which had not been covered. A range of comments were received. Predominantly most of these re-iterated issues regarding site conditions which was a common theme throughout the survey responses and consultation. The cultural lifestyle of Gypsy/Travellers is also an important consideration for households in relation to their housing needs.

- Site needs total upgrade / new road / better facilities / modernisation
- Site in poor condition / well behind times / new bigger site required
- If site provision was better - would live there
- Lived on site for 16years / couldn't afford to replace caravan needed more space had to move/ site very poor but moving to house upsetting and massive cultural change / would go back site if met family needs
- Would move back to Dunchologan if site was better / forced into a house due to terrible conditions and anti-social behaviour
- Gypsy/Traveller living in house - wants to be able get back to own way life - travelling lifestyle
- Partner is carer and also carer for sister - currently live less than mile which helps in carer role – unlikely to get house in local area - feel forced to move further away and will need leave community where we feel safe

The comments are particularly pertinent as a survey summary. Many of these touch on key aspects for consideration as future actions points, such as: review of current site provision; financial assistance or alternative housing models for those who can't afford to replace trailer/caravans; cultural awareness and the impact that not being able to live traditional lifestyle has on households; and the caring/support needs of households.

#### **4.6 Recording Housing Need**

There are a limited number of official local measures or sources that can be used to record the actual number of Gypsy/Traveller households who are in 'housing need'. This is due to a variety of reasons.

The HOMEArgyll waiting list is the primary source used to identify households in need. A number of respondents to our research reported that due to the limited number of site pitches available in the area, this is seen as a deterrent for families to register their need on the waiting list, and consequently actual need is being under-reported and suppressed.

A number of participants in the focus group also noted that they felt that the RSL application process was a barrier for many members of the community being able to register their interest for a pitch. The reasons cited included lack of skills to apply online, being deterred by area staff, poor site standards and some instances of discrimination or anti-social behaviour. There was a consensus that the actual need

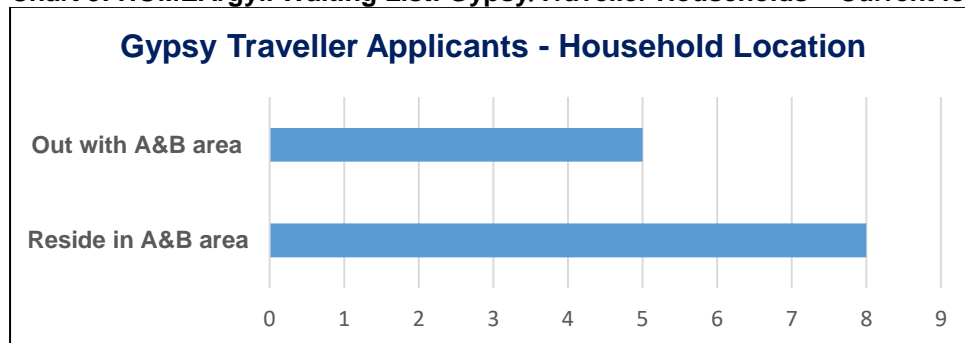
and demand for site pitches would be higher than official figures suggested due to local knowledge and through word of mouth, fellow Gypsy/Travellers feel that it is not worthwhile applying if sites are full.

HOMEArgyll Housing Lists

Households interested in a pitch on Gypsy/Traveller site need to apply via the HOMEArgyll common housing register or by contacting local Argyll Community Housing Association offices - <http://www.homeargyll.co.uk/>

As at June 2020 the HOMEArgyll active housing list had **13** households who have recorded their Primary Ethnic Origin as Gypsy/Traveller. Eight of those households currently reside in Argyll and Bute. Three reside elsewhere in Scotland and two in England.

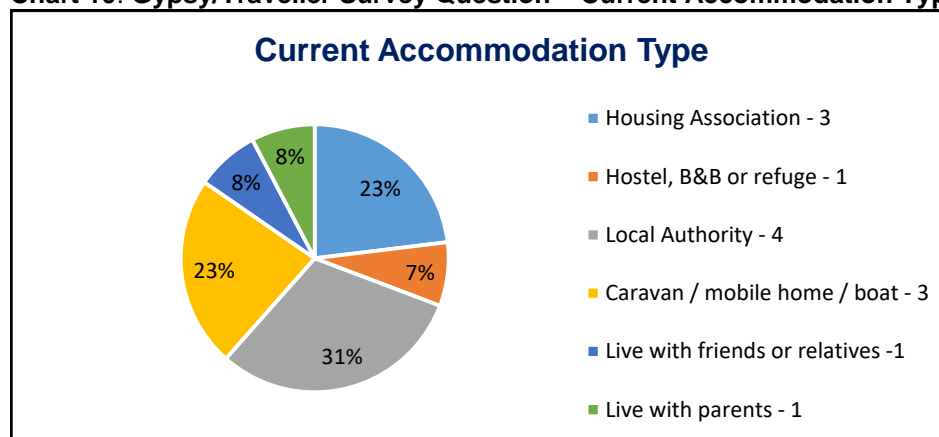
**Chart 9: HOMEArgyll Waiting List: Gypsy/Traveller Households – Current location**



Source: HOMEArgyll Common Housing register, 2020

The following chart shows that the majority of Gypsy/Traveller applicants currently stay in either Local Authority or Housing Association accommodation, or in their own caravan/mobile home/boat.

**Chart 10: Gypsy/Traveller Survey Question – Current Accommodation Type**



Source: HOMEArgyll Common Housing register, 2020

From the HOMEArgyll housing list in June 2020, **6** of the 13 Gypsy/Traveller households identified themselves as either homeless or threatened with homelessness. **4** of these were in the Argyll and Bute area and **2** were out with the

area. However, only 1 Gypsy/ Traveller household was recorded as statutory homeless in Argyll and Bute during this period of time.

### Bield Housing List

Bield operate independently of the HOMEArgyll partnership, and hold their own waiting list. Their annual returns have been reviewed and the table below shows the applicants who have recorded their ethnicity as White Gypsy/Traveller on their Argyll and Bute waiting list over the last five years.

**Table 9: Bield Waiting List 2015/16 – 2019/10**

<b>Bield Waiting List</b>	<b>White Gypsy/Traveller Applicants</b>
<b>2015/16</b>	0
<b>2016/17</b>	1
<b>2017/18</b>	1
<b>2018/19</b>	2
<b>2019/20</b>	0

### Homeless applications

During the last five years there were 63 homeless applications made in Argyll and Bute where the household stipulated that they were part of Gypsy/Traveller community. However during the same period only 6 recorded their ethnic origin as White – Gypsy/Traveller.

**Table 10: Homeless Annual Statistics 2015/16 – 2019/20**

<b>HL1 Question</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>
<b>Applicant or partner describe themselves as a Gypsy/Traveller</b>	10	19	10	14	10
<b>Ethnic origin – White Gypsy/Traveller</b>	1	4	0	1	0

Source: Scottish Government Annual HL1 data

This identifies a potential inconsistency in the response to questions from households making applications, but also highlights that there is a lack of ethnicity options for selection and ‘White – Gypsy/Traveller’ is the only option available. The lack of options could be a factor in the variation of responses and there may be additional fields that would be applicable to the Gypsy/Traveller community, for example such as Mixed – Gypsy/Traveller, or Black – Gypsy/Traveller.

The ethnicity options are statutory data fields set by Scottish Government guidance and are also used in wider policy and statistical data, such as the Census. As part of the findings of this report, a wider recommendation will include support for a review of ‘ethnicity options’ in conjunction with Gypsy/Traveller community to identify if these should be broader to better represent the community.

#### **4.7 Housing Support**

The council's dedicated Housing Support Co-ordinator reviewed the cases of households receiving support for the preceding years with local support providers. Feedback from Housing Support providers across Argyll and Bute indicated that there were only 4 households that had identified themselves as Gypsy/Travellers currently in receipt of housing support as at November 2019.

#### **4.8 Education**

The Education Department undertake an annual survey on the same week each year which asks for ethnicity data for children on current school role including nursery aged children where applicable. The records denote that very few households identified as White – Gypsy/Travellers on their registration form or on subsequent annual data checks.

**Table 11: Gypsy/Traveller Count of Total School Roll**

<b>Argyll and Bute – Gypsy/Traveller Count of Total School Roll</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
<b>Grand Total</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>9</b>

**Source: Argyll & Bute Council Education data as at 9<sup>th</sup> April 2020**

There is a dedicated Education – Gypsy/Traveller Area Support Officer who reported that whilst they are aware of many Gypsy/Traveller households in Argyll and Bute, they don't always identify themselves as such, to avoid prejudices. In their experience the Gypsy/Traveller community have suffered discrimination particularly in Lochgilphead area.

There is recognition that there needs to be more cultural awareness of the needs of Gypsy/Travellers within the Education system for both staff and pupils. There needs to be better information and training to support the needs of this particular community and also a need for flexibility in the curriculum to meet needs of pupils and to be relevant for their future aspirations. To address these issues the Education Department have arranged to participate in the STEP - Scottish Traveller Education Programme with local high schools. This was due to take place in both Oban and Lochgilphead in 2020, but due to Coronavirus has been put on hold and will be rearranged when restrictions allow.

#### **4.9 Health**

A number of key agencies were contacted regarding the health needs of Gypsy/Travellers to ascertain the provision of localised statistical data and information for this group. However, despite numerous attempts, no data was forthcoming.

Discussions were held with the Advanced Nurse - Vulnerable Groups, a local health officer whose remit covers this particular client group. However, at the time of these discussions the nurse was not engaged with any Gypsy/Traveller households.

Contact was also made with a Public Health Improvement Service Officer and the Interim Lead Health Improvement Nurse who both explored data available for Argyll



and Bute for this report. The Interim Lead Health Improvement Nurse confirmed that historically there had been an equivalent post to her own which covered Argyll and Bute and at that time some focused work with MECOPP had been undertaken but this post has now come to an end.

#### ***4.10 Covid-19 Pandemic – An Unsafe Distance: the impact of the COVID-19 pandemic on Excluded People in England***

A rapid needs assessment was undertaken by Doctors of the World to assess the impact of 'excluded people' in England during the Covid-19 pandemic. The report was published in May 2020 and whilst it was based in England, took into account the impact of Covid-19 on the Gypsy/Traveller community. Whilst this study did not engage with Scottish Gypsy/Travellers the report highlights some of the key issues identified in our other areas of research and details the impacts they are likely to face during the pandemic and which would also be relevant to Gypsy/Traveller communities in Argyll and Bute. The report highlights the following issues as a concern for Gypsy/Traveller households in general:

- People from Gypsy, Roma and Traveller communities living on traveller sites, unauthorised encampments or roadsides have poor or unstable access to the internet, with some relying on a single Wi-Fi router for an entire traveller site.
- The language used in guidance is often not accessible for people in excluded groups with **low literacy levels**. People from Gypsy, Roma and Traveller communities, and people experiencing homelessness often have lower levels of literacy than the general population.
- People from Gypsy, Roma and Traveller communities experienced a general **lack of living space** within caravans and trailers for adequate physical distancing and self-isolation.
- School closures have led to **exclusion from education for children**. Children within the Gypsy, Roma and Traveller communities have been cut out of education as teaching moved online, and parents with low literacy and little physical space have limited ability to provide home schooling.
- The Gypsy, Roma and Traveller community has been heavily impacted by job losses as many are self-employed or rely on informal or seasonal work to support extended families and communities.

It will be important for the council and its partners to monitor the potential impacts of the pandemic on Gypsy/Traveller in the future, and ensure that any highlighted needs are addressed moving forward.

## **5. Recommendations**

There are a number of recommended actions set out in national guidance which the responsible organisations must adhere to and these should be carried forward via the LHS and relevant action plans.

The following recommendations have been developed on the basis of the information, analysis and stakeholder views recorded in this report.

1. Establish an 'Argyll and Bute Gypsy/Traveller Working Group' with internal and external partners and members of the community to take forward work to improve provision and meet the needs of Gypsy/Travellers in Argyll and Bute and also meet the aspirations of the Scottish Government/COSLA *Improving the Lives of Scotland's Gypsy/Travellers (2019-2021)* Action Plan.
2. Work jointly with ACHA and Gypsy/Travellers to take forward plans to upgrade existing sites. Including:
  - Review space provision on allocated pitches within Gypsy/Traveller sites for households to have multiple accommodation units, such as caravans/trailers in order to accommodate larger Gypsy/Traveller families.
  - Provision of adequate lightening across the sites;
  - Improvements to access road at Dunchologan due to poor condition, lack of passing spaces and no lighting;
  - Provision of amenity and recreational spaces;
  - Improve the energy efficiency and running costs of amenity blocks;
  - Updated or replacement of fencing around Gypsy Traveller sites to enhance the outlook for residents whilst providing an element of security.

\*Please refer to Place Standard paragraphs for engagement recommendation

3. Explore additional accommodation for variable needs - the two existing Gypsy/ Traveller sites in Argyll and Bute do not offer the community flexible accommodation options and provide access to serviced pitches only. Access to the sites are therefore restricted to those households who have the means to provide their own mobile living accommodation.
4. Review the scope for flexibility within the common housing application and allocation processes to take into account the diverse needs of this community in terms of their cultural beliefs – such as male/female children having separate living accommodation.
5. Develop a formal protocol as part of 'Working Group' to allow more robust information collection on the needs of transient households. A more co-ordinated approach is also required to engage and provide support to those Gypsy/Traveller households and assess their housing needs.
6. Identify alternative ways to identify and engage with Travelling Showpeople.
7. Ensure that Gypsy/Traveller households are able to access housing advice and support in appropriate formats
8. Raise the awareness of Gypsy/Traveller cultural needs across housing organisations and support agencies through specialist training

9. Consider a review of how Gypsy Travellers record their housing needs on the HOMEArgyll waiting lists to reflect more accurately demand for the sites. This review should consider provision of alternative ways to apply for site, due to literacy issues and reluctance of the community to register their needs.

#### **Wider Recommendations for consideration by Partners:**

- There was an overall consensus that the cultural elements of the Gypsy/ Traveller community is not taken into account when considering their housing needs. This should be integrated in future HNDA and LHS processes.
- Those resident in settled accommodation felt that this restricted them from being able to continue a nomadic lifestyle of travelling throughout the year. Main concerns related to lack of places to keep caravans/trailers within garden grounds, or restrictions by tenancy conditions. Potential solutions should be explored jointly with Gypsy/Travellers.
- ACHA may wish to consider the use of an independent agency to undertake their annual satisfaction surveys, in order to preclude unintended bias and address points raised in national reports on how satisfaction data is collected.
- Explore options to improve public transport links and the potential for a bus stop at Dunchologan site to provide safer access for those without transport.
- Argyll and Bute Council would support a national policy review of 'ethnicity options' in conjunction with Gypsy/Traveller community to identify if these should be broader to better represent the community and not limited to 'White – Gypsy/Traveller'.

**NOTE**– *ACHA are reviewing current site provision and there will be two phases of site improvements undertaken, involving short and longer term works. Data from this current research will also help to inform the priorities and key issues that need to be addressed.*

#### ➤ **Place Standard Tool – Gypsy/Traveller Engagement**

The Place Standard Tool is recognised as a simple framework which can help structure discussions with key stakeholders in a methodical way about the physical and social aspects of a 'place'. The tool is designed to assess the quality of a place and can be used in spaces that are well established, undergoing change, or are still in the planning process. Using the framework helps to identify the assets, improvements required, and priorities for a particular place. The Planning Authority Scotland (PAS) report: *Using the Place Standard tool to assess the quality of Gypsy/Traveller sites*, published in November 2019 has evaluated the value of the Place Standard Tool to engage with the Gypsy/Traveller community regarding site provision/conditions.

Overall it was found to be an effective framework. However, there are some aspects of the tool and supporting guidance where they identify that it could be improved to

incorporate the cultural needs and lifestyle of Gypsy/Travellers. Such as, promoting questions under Housing and Community, Streets and Spaces and Work and Local Economy, to recognise the importance of associations between homes, space around homes and work places to Gypsy/Travellers; Ensuring that the significance of the Gypsy/Traveller culture and lifestyle is captured in the 'Identity and Belonging' segment, as well as recognising the importance of certain places, types of places, and relationships to the land and nature in the Gypsy/Traveller culture.

If effectively used, there are clear benefits to using the Place Standard framework with the Gypsy/Traveller community to develop a clearer understanding of their needs and aspirations for existing sites in Argyll and Bute. We would strongly recommend that partners consider use of the Place Standard framework to facilitate engagement with the local Gypsy/Traveller community so they are involved in shaping their places and delivering meaningful changes.

## **6. Conclusion**

The report has considered a number of primary and secondary, and local and national data sources to produce a meaningful and robust set of recommendations which will inform the Council's next LHS, and which will seek to meet the current and future accommodation needs of Gypsy/Travellers in Argyll and Bute.

Whilst the number of completed surveys underpinning this dedicated research study was relatively small, they provide both quantifiable and qualitative data on the views of the local Gypsy/Traveller community. Together with the supplementary information provided verbally at the Gypsy/Traveller focus group, MSP Round Table discussions and via other stakeholder engagement, there are sufficient indicators that suggest there is an urgent need to make significant improvements to the standard of accommodation and services provided on existing Gypsy/Traveller sites.

## Appendix 1 – Gypsy Traveller Accommodation Needs Survey



### Housing Need and Demand Assessment 2019-20

### Gypsy Traveller Accommodation Needs Survey

This questionnaire has been developed to help us identify the needs of Gypsy Traveller communities within Argyll and Bute to inform the Housing Need and Demand Assessment (HNDA). If there are any particular aspects or areas which have not been covered which you feel are important please do not hesitate to let us know.

All information provided will be treated as confidential. The information gathered and produced in the Housing Need and Demand report is anonymous.

#### Household Profile

**Q1. Household Details – please tell us about the members of your current household**

	Male	Female	Age children
Number of Adults (16+)			
Number of Children			

**Q2. Are all members of the household part of the same family or do they include different relationships / family members?**

Relationship Details: i.e Main household / extended family members etc

#### Current Accommodation – Sleeping

**Q1. Please tell us about your current housing situation**

Type of accommodation lived in – please tick	
Trailer / van / Static	
Chalet etc	
Social rented housing	
Private rented housing	
Owner occupied housing	

**Q2. How long have you stayed in current accommodation?**

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**Q3. If you reside in Trailer / Van / Static /Chalet / other – How old is it? i.e years**

<b>Age of accommodation lived in:</b>	
Trailer / van / Static / Chalet	
Not applicable	

**Q4. If you reside in Trailer / Van / Static /Chalet / other – What condition is it in?**

<b>Condition of accommodation lived in: please tick most appropriate</b>	
Good condition and state of repair	
Requires minor repairs – details	
Requires major repairs - details	
Other- please provide details:	

**Q5. Does your accommodation have adequate facilities?**

<b>Facilities</b>	<b>Yes or No – provide specific details</b>
Living space	
Sleeping space	
Heating	
Facilities	
Adaptations to meet needs of household i.e. level access etc	

**Q6. Does your existing accommodation meet the current needs of all members of your household?**

<p>YES or NO :</p> <p>If NO selected please provide some details:</p>
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**Q7. Have you made provision for future replacement of Trailer / Van / Static /Chalet / other?**

<p>YES or NO:</p> <p>Likely timescale:</p> <p>How will you finance the replacement?</p>
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**Q8. Is this your own only home, or do you have another home/location that you use? Please tell us:**

Type of accommodation:	
Where it is located:	
How often you use:	
Reason for use: i.e work/ culture / family etc	

**Q9. Does your household still go travelling?**

<b>Our household travels</b>	Yes or No – please circle
<b>How often do you travel?</b>	
<b>Where do you travel to?</b> Please provide details of key locations / areas	

**Q10. If your household travels, has your pattern of travelling changed over the last few years? If so, please tell us why:**

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**Q11. When travelling do use the following?**

<b>Type of accommodation / site</b>	<b>Please tick those that apply</b>
Owner occupied housing	
Social rented housing	
Private rented housing	
Authorised Gypsy Traveller sites	
Private sites	
Road side stopping	
Negotiated stopping places	
Other – please detail	

**Q12. Are you aware of any locations in Argyll and Bute that are regularly used out with designated Gypsy Traveller sites?**

Please provide details:
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## Site Provision

Argyll Community Housing Association manage both the designated Gypsy Traveller sites in Argyll and Bute. They undertake annual satisfaction questionnaires in relation to the services they provide and deliver. This HNDA survey focuses more on housing needs of the community than the services provided by landlord.

### **Q1. If you have your own accommodation unit where is this located?**

<b>Do you currently rent a pitch on designated Gypsy Traveller site in Argyll?</b>	<b>Yes or No</b>  <b>Where:</b>
<b>Do you have a pitch on privately owned site?</b>	<b>Yes or No</b>  <b>Where:</b>
<b>Do you think there is a sufficient number of designated Gypsy Traveller pitches / sites in Argyll and Bute?</b>	<b>Yes or No</b>  <b>Details:</b>

### **Q2. What are the BEST things about the site?**

For example - Location / cost / number of pitches / size of pitches / amenity block / facilities / services / other

### **Q3. What are the WORST things about the site?**

For example - Location / cost / number of pitches / size of pitches / amenity block / facilities / services / other

### **Q4. What are the things you would change about the site?**

For example - Location / cost / number of pitches / size of pitches / amenity block / facilities / services / access to site / management issues / other



## Future Accommodation Needs

**Q1. Do you think you're likely to move from existing accommodation in the near future?**

Likely to move	Yes or No
Approx. timescale	

**Q2. If your household is likely to move, where would this be to?**

Area	Response
Remain within Argyll and Bute – please provide indication of the areas	
Other area in Scotland - please provide indication of the areas	
Elsewhere in the UK - please provide indication of the areas	
Overseas - please provide indication of the areas	

**Q3. What type of accommodation would you be likely to move to?**

Type of accommodation / site	Please tick those that apply
Owner occupied housing	
Social rented housing	
Private rented housing	
Authorised Gypsy Traveller sites	
Private sites	
Road side stopping	
Negotiated stopping places	
Other – please detail	

**Q4. What would the main reason/s be for you choosing to move?**

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**Q5. Are there any barriers stopping you from being able to move?**

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**Q3. Do you know how to access housing advice in Argyll and Bute?**

Yes or No:

**If you would like further information and advice on housing options, please let us know and we will help signpost you to relevant services**

**Other**

**Please let us know if there are any other factors that affect your housing situation that has not been covered by the survey**

## Appendix 2 - Documents Reviewed

- Argyll Community Housing Association, *Gypsy/Traveller Strategy 2019-22*, available from <https://www.acha.co.uk/resources/HNS-08-Gypsy-Travellers-Strategy-2019---2022.pdf>
- Argyll Community Housing Association – *Annual Satisfaction Surveys 2015 to 2019*, available from <https://www.acha.co.uk/services-gypsy-traveller/>
- Craigforth, *An Accommodation Needs Assessment of Gypsies/Travellers in West Central Scotland report*, June 2007
- Doctors of the World, *An Unsafe Distance: the impact of the COVID-19 pandemic on Excluded People in England*, available from [https://www.doctorsoftheworld.org.uk/wp-content/uploads/2020/05/covid19-brief-rna-report.pdf?mc\\_cid=ebc2312d4d&mc\\_eid=592686196d](https://www.doctorsoftheworld.org.uk/wp-content/uploads/2020/05/covid19-brief-rna-report.pdf?mc_cid=ebc2312d4d&mc_eid=592686196d)
- Friends, Families and Travellers (FFT), <https://www.gypsy-traveller.org/>
- MECOPP, *Self-directed support and Gypsy/Travellers 2015*, available from <https://www.mecopp.org.uk/mecopp-publications/2019/1/9/self-directed-support-and-gypsytravellers>
- My Dream Site, available from <https://www.gypsy-traveller.org/wp-content/uploads/2017/03/mydreamsite.pdf>
- PAS, *Using the Place Standard tool to assess the quality of Gypsy/Traveller sites*, November 2019, available from <https://www.pas.org.uk/wp-content/uploads/2019/11/PAS-NHS-Health-Scotland-Gypsy-Traveller-Place-Standard-Report.pdf>
- Scottish Social Attitudes survey: Attitudes to discrimination and positive action 2015, available from <https://www.gov.scot/publications/scottish-social-attitudes-2015-attitudes-discrimination-positive-action/>
- The Scottish Government, *Evidence Review: Accommodation Needs of Gypsy/Traveller's*, October 2020, available from <https://www.gov.scot/publications/evidence-review-accommodation-needs-gypsy-travellers-scotland/>
- The Scottish Government: *Gypsy/Travellers and the planning system: action plan 2019*, available from <https://www.gov.scot/publications/gypsy-travellers-and-the-planning-system-action-plan/>
- The Scottish Government, *Gypsy/Traveller Sites in Scotland*, April 2019 available from <https://www.gov.scot/publications/gypsy-traveller-sites-scotland/>

- The Scottish Government, *Improving Gypsy/Traveller sites: guidance on minimum sites standards and site tenants' core rights and responsibilities*, May 2015 available from <https://www.gov.scot/publications/improving-gypsy-traveller-sites-guidance-minimum-sites-standards-site-tenants/>
- The Scottish Government, *Improving the Lives of Scotland's Gypsy/Travellers (2019-2021) / Action Plan*, available from <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2019/10/improving-lives-scotlands-gypsy-travellers-2019-2021/documents/improving-lives-scotlands-gypsy-travellers-2019-2021/improving-lives-scotlands-gypsy-travellers-2019-2021/govscot%3Adocument/improving-lives-scotlands-gypsy-travellers-2019-2021.pdf>
- The Scottish Government, *Managing unauthorised camping by Gypsy/Travellers in Scotland: guidance for local authorities*, April 2017 <https://www.gov.scot/publications/guidance-local-authorities-managing-unauthorised-camping-gypsy-travellers-scotland/pages/1/>
- The Scottish Government, *Policies: Gypsy/Travellers* <https://www.gov.scot/policies/gypsy-travellers/>
- The Scottish Government, *Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation*, June 2018 <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2018/06/practical-fire-safety-guidance-existing-premises-sleeping-accommodation/documents/00536681-pdf/00536681-pdf/govscot%3Adocument>
- The Scottish Government, *The Caravan Sites Act 1968 (Amendment of definition of caravan) (Scotland) Order 2019: BRIA* <https://www.gov.scot/publications/business-regulatory-impact-assessment-caravan-sites-act-1968-amendment-definition-caravan-scotland-order-2019/>
- The Scottish Housing Regulator, National Panel of Tenants and Service Users 2018/19, Thematic Report: Gypsy/Traveller sites, 2019 available from <https://www.housingregulator.gov.scot/media/1264/shr-national-panel-2019-report-5-gypsy-traveller-final.pdf>
- The Scottish Housing Regulator, *Charter Data All Social Landlords Complete Dataset 2019-20*, 30<sup>th</sup> October 2020 available from <https://www.housingregulator.gov.scot/landlord-performance/statistical-information>

### **Appendix 3 - Consultation Resources / Contacts**

- Acting Principal Teacher for Pupil Support
- Admin and Management Information Officer, Education
- Advanced Nurse Vulnerable Groups
- Argyll and Bute Council, Development Manager
- Argyll Community Housing Association
- Community Development Worker MECOPP
- COSLA
- Forestry and Land Scotland
- Friends, Families and Travellers (FFT)
- Gypsy/Traveller Households
- Interim Lead Health Improvement Nurse
- Loch Lomond and Trossachs National Park
- Planning Authority Scotland
- Scottish Government – Homes Division / Meeting
- Scottish Housing Network