

Equality Impact Assessment

1. Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.

Welsh Government is committed to creating a Wales which will provide fair access to services for all and deliver fairer outcomes for our diverse people and communities across Wales.

The updated guidance documents incorporate protections under the Equality Act 2010, affirming the protected characteristic of Gypsy, Roma and Travellers. It urges authorities to approach site management through the lens of the Public Sector Equality Duty (PSED), especially the duty to eliminate discrimination and foster good relations with members. The guidance documents also build on the Equality Act to ensure site management is both fair and inclusive, highlighting the need for working in partnership with Gypsy, Roma and Traveller communities.

The National Equality Objectives (NEOs) provide a clear framework for ensuring that equality considerations are embedded in public service delivery and policy development across Wales. The publication of these guidance documents contributes to the NEOs, particularly those outlined below:

- **National Equality Objective 1:** we will create a Wales where everyone has opportunities to prosper in line with our organisational goal to reduce poverty.
- **National Equality Objective 2:** we will create a Wales where everyone can be aware of their human rights, and where those rights are protected, promoted, and underpin all public policy.
- **National Equality Objective 3:** we will create a Wales where everyone can be aware of and has equitable access to high quality public services.
- **National Equality Objective 4:** we will create a Wales free from discrimination, victimisation, harassment, abuse, hate crime and/or bullying against all people.

The publication of four dedicated guidance documents for the Gypsy, Roma and Traveller communities support the aims of the Strategic Equality and Human Rights Plan (SEHRP). These resources support the plan's core principles of eliminating discrimination and advancing equality of opportunity. It also promotes the fostering of good relations between communities particularly for groups that continue to experience entrenched inequality and marginalisation. The SEHRP's vision for a fairer Wales, aligns with the publication of the guidance documents as it reflects the distinct needs of Gypsy and Traveller communities in Wales and provides the tools for public bodies to better meet their legal and moral obligations.

Overall, there are no perceived negative equality impacts or restrictions for the proposal to publish the 4 updated Gypsy, Roma and Traveller guidance documents following the period of consultation.

Instead, there are perceived positive effects to those from the 9 protected characteristics. The table on page 48 outlines a record of impacts by each of the 9 protected characteristics.

Consideration should be given to the following questions. Please consider whether there are possible impacts for subsections of different protected characteristic groups.

◆ *How will the proposal promote equality (Please see the general duties)?*

Updating the four Welsh Government guidance documents directly supports the general equality duties under the Equality Act 2010, particularly the Public Sector Equality Duty (PSED). These duties require public bodies to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between people who share a protected characteristic and those who do not. Gypsies and Travellers are recognised ethnic groups under the Act, so detailed and more inclusive guidance will help ensure their rights are upheld.

Updating the guidance helps promote equality by ensuring that the needs and rights of Gypsy, Roma and Traveller communities are better understood and more consistently met across Wales. By strengthening guidance on managing unauthorised encampments, local authorities will be encouraged to take a fair, proportionate and non-discriminatory approach, reducing the risk of marginalisation. Improved standards for designing and managing sites will help tackle long-standing inequalities in access to safe, secure and culturally appropriate accommodation. Clearer guidance on Gypsy and Traveller Accommodation Assessments (GTAAs) will lead to more accurate identification of housing needs, ensuring that services and planning are informed by real evidence and community voices. Overall, the updated guidance will support more consistent and inclusive decision-making, reduce barriers to services, and help public bodies meet their duties under the Equality Act 2010.

Together, the four documents also encourage respectful engagement between local authorities and Gypsy, Roma and Traveller communities, helping to foster better understanding and relations which is a key element of the general duties and one of the three arms of the public sector equality duty.

The public consultation of the four guidance documents with Gypsy, Roma and Traveller community members was conducted by third sector organisations. When awarding this community engagement contract to the two organisations the specification mentioned that any form of engagement with community members must be accessible, regardless of gender/health/disability/ethnicity etc to allow for equality of opportunity to participate in the engagement process. Including children and young people.

◆ *What are the possible negative impacts on people in protected groups and those living in low income households and how will you mitigate for these?*

There are no perceived possible negative impacts on people within protected groups, and specifically in this instance for Gypsy, Roma and Traveller groups.

The four updated Guidance documents embed equality and inclusion principles to reduce discrimination, improve access to culturally appropriate services, and ensure that public bodies meet the needs of marginalised communities, particularly those with protected characteristics and low-income backgrounds.

The updated guidance documents recognise the socio-economic challenges faced by Gypsy, Roma and Traveller communities and emphasises the importance of affordable and suitable accommodation options to address inequalities and improve living conditions.

The Managing Unauthorised encampments guidance in particular advises authorities to consider all circumstances including welfare needs when deciding whether to take eviction action and consider the socio-economic circumstances of residents before taking enforcement action. The Managing Gypsy and Traveller Site guidance also outlines that some Gypsy and Traveller communities are known to experience high levels of poverty. If a resident has difficulty paying their pitch fees, they should be encouraged to approach the site manager or local authority staff at the earliest opportunity, who should try to help them to resolve this or direct them to organisations who may be able to provide support, including access to benefits.

Housing Benefit is an acceptable form of payment for pitch fees, and the site manager may highlight this to residents as an option but is the responsibility of the resident to arrange this. The site manager may also assist (if required) residents in applying for Universal Credit.

We will work with colleagues in the public sector and local authorities via monitoring meetings to encourage adherence to the guidance in delivering better outcomes for Gypsy, Roma and Traveller communities in Wales.

- ♦ *What if any, barriers do people who share protected characteristics face? Can these barriers be reduced, removed, mitigated?*

Gypsy Roma and Traveller communities in Wales are recognised as protected groups under the Equality Act 2010. They face multiple barriers including racial discrimination and prejudice due to ongoing stigmas that contribute to exclusion from education, healthcare and safe accommodation. They also face barriers in relation to limited engagement when it comes to decision-making, and a lack of meaningful engagement with these communities has led to decisions that do not reflect the lived experiences of Gypsy, Roma and Travellers in Wales.

The four updated guidance documents aim to mitigate some of these issues and improve the lives of Gypsy, Roma and Traveller communities in Wales by setting out clear expectations for local authorities. The *Managing Unauthorised Encampments* guidance helps ensure that temporary encampments are handled fairly, proportionately, and in a way that respects human rights, discouraging discriminatory or heavy-handed enforcement. The *Designing Gypsy and Traveller Sites* guidance provides standards for creating safe, culturally appropriate, and well-equipped sites, including guidance on layout, facilities, and access to essential services. The *Managing Gypsy and Traveller Sites* guidance supports local authorities in maintaining existing sites to a high standard, ensuring that issues like repairs are managed consistently and respectfully. Finally, the *Gypsy and Traveller Accommodation Assessments (GTAA) Guidance* helps local authorities carry out accurate assessments of local accommodation needs, so that future site provision is based on community needs.

Together, these documents aim to improve accommodation, reduce inequalities, and promote the rights and inclusion of Gypsy, Roma and Traveller communities across Wales.

These updated documents were shared for public consultation, and a contract was awarded to a third sector organisation to gather feedback on consultation documents directly from community members.

The publication of the updated guidance provides a practical route to reduce inequality and discrimination for Gypsy, Roma and Traveller community members. Ongoing monitoring and working in partnership with Gypsy, Roma and Traveller communities will be essential to ensure these impacts are realised.

- ◆ *Share your EIA wider within Welsh Government, ask colleagues to consider unintended impacts.*
- ◆ *How have you/will you use the information you have obtained from research to identify impacts?*

The revised guidance documents are non-statutory and do not impose any new legislation on local authorities. However, the guidance was last updated in 2015. Since then, policies and legislation have developed enough to require revisions and a refresh in types of language used. For example, the updated documents now include reference to the Police, Crime, Sentencing and Courts Act 2022. The guidance will also present a more up-to-date picture of the issue in Wales as the Gypsy, Roma and Traveller population has increased and is far more diverse.

In the 2011 Census, the category “White: Irish Traveller/White Gypsy” recorded 2,785 people in Wales and in the 2021 census 3,550 people identified as Gypsy or Irish Traveller in Wales. The update of these guidance documents follows an action from the Anti Racist Wales Action Plan (ArWAP)¹ republished in 2024. There is a goal within the Homes and Places chapter of the ArWAP “to recognise that safe, culturally appropriate accommodation is necessary in order for individuals to flourish in other parts of their lives and to address the lack of site provision and poor quality of Gypsy and Traveller accommodation in Wales.” There is an action that sits under this goal to ‘Re-draft and simplify the Gypsy and Traveller Sites Guidance, involving community members to reflect their needs’, which is what these refreshed guidance documents seeks to do. Additionally, the Crime and Justice chapter includes an action to ‘Update the Managing Unauthorised Camping guidance, involving community members to reflect their needs.’

The Well-being of Future Generations (Wales) Act 2015 is about improving the social, economic, environmental and cultural well-being of Wales, providing a built environment fit for future generations. By proposing to update the guidance in line with updated policies and language, local authorities will be guided to consider how they can commit to improving the lives of Gypsy, Roma and Traveller communities in their respective authorities such as by designing a sustainable and sustainable accommodation and ensuring the GTAA process is followed.

¹ Anti-racist Wales Action Plan: 2024 update [HTML] | GOV.WALES

Welsh Government conducts a data collection process twice a year, known as the Caravan Count. This count gives a picture of the number of Gypsy or Traveller caravans on authorised and unauthorised sites in January and July.

The July 2025 and January 2026 caravan count was paused whilst officials revise the data collection process to ensure greater accuracy.

There was also significant contribution from our legal team to ensure that the guidance documents were in line with latest policy and statutory guidance.

♦ *How will you know if your piece of work is a success?*

These impacts of the updated guidance documents will not be directly measured, especially as most of it is not statutory for local authorities to implement. However, under the Housing (Wales) Act 2014, Welsh local authorities have a statutory duty to assess and meet the accommodation needs of Gypsies, Roma and Travellers residing in or resorting to their area, as identified in the GTAA Guidance. In addition, Welsh Ministers have statutory powers under Section 104 of the Act to direct a local authority to exercise its powers under Section 56 of the Mobile Homes (Wales) Act 2013 where an authority has failed to meet those identified needs.

Indicators of success include the extent to which local authorities adhere to the guidance, demonstrate improvements to sites and enhance the quality of their Gypsy and Traveller Accommodation Assessments. This will be assessed through regular monitoring meetings with local authorities.

♦ *Have you developed an outcomes framework to measure impact?*

Not at this stage.

Record of Impacts by protected characteristic:

Please complete the next section to show how this policy / decision / practice could have an impact (positive or negative) on the protected groups under the Equality Act 2010. *(Please refer to the EIA guidance document for more information.)* It is important to note any opportunities you have identified that could advance or promote equality of opportunity. This includes identifying what we can do remove barriers and improve participation for people who are under-represented or suffer disproportionate disadvantage.

Lack of evidence is not a reason for *not assessing equality impacts*. Please highlight any gaps in evidence that you have identified and explain how/if you intend to fill these gaps.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
Age (think about different age groups)	Positive	Both adults and children will positively impact from the publication of the 4 updated guidance documents. The Designing and Managing Gypsy and Traveller sites guidance's in particular promote age-inclusive play areas and accessible features.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.
Disability (consider the social model of disability ² and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)	Positive	The updated guidance documents strengthen the requirements for local authorities to consider inclusive and accessible site design e.g. wheelchair-accessible pitches. The guidance documents outline that the local authority must make reasonable adjustments to both pitches and amenity blocks to enable them to be suitable for an applicant with a disability.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.

² Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

		It refers to the Disabled Facilities Grant that Local authorities may use to ensure that pitches and amenity blocks are made to be accessible. The Managing Gypsy and Traveller sites guidance outlines as part of their example 'induction checklist' that Disability / adaptations must be considered. Furthermore, the Designing a Gypsy Traveller site guidance outlines that local authorities should consult with prospective residents before finalising amenity block plans. Residents may prefer showers to baths or to have slightly differently sized rooms. Local authorities are made aware of their duties to make reasonable adjustments for disabled residents under the Equality Act 2010. In particular, where a physical feature of a site puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled, the local authority must take reasonable steps to avoid the disadvantage to the disabled person. In order to future-proof sites, the guidance recommends that amenity blocks are designed in such a way that will allow for adaptations to be made to accommodate any future	
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		disabled residents or with any other particular needs where possible.	
Gender Reassignment (the act of transitioning and Transgender people)	Positive	Although the guidance doesn't explicitly refer to Gender Reassignment, it reduces the risk of discrimination during interactions with authorities by encouraging fair and respectful treatment of all residents regardless of gender identity, in line with Equality Act 2010.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.
Pregnancy and maternity	Positive	The Managing Gypsy and Traveller sites guidance document in particular highlights the importance of facilitating access to health services, including maternity care. It suggests that community midwives and health visitors may wish to use site offices for on-site consultations and vaccination clinics.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.
Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)	Positive	The updated guidance documents encourage the improvement of site provision which seeks to directly support members of the Gypsy, Roma and Traveller community who are recognised racial groups under the Equality Act 2010.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.

Religion, belief and non-belief	Positive	The updated guidance documents reinforce the importance of religion and belief. There are specific references in the guidance around site management includes respecting and facilitating the cultural and religious practices of residents, including the provision for private and communal areas as appropriate. The managing unauthorised encampments guidance documents also mentions that authorities should consider the cultural and religious identities of those residing in encampments.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.
Sex / Gender	Positive	The updated guidance documents emphasise incorporating gender considerations into site design to promote safety and accessibility, including separate and secure facilities for men and women, and spaces that accommodate different family and gender needs. The Managing unauthorised encampments guidance in particular outlines how Local authorities must ensure that enforcement actions respect the rights and dignity of all residents, with particular attention to vulnerable groups including women and children.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.

Sexual orientation (Lesbian, Gay and Bisexual)	Positive	Whilst the updated guidance documents do not explicitly mention sexual orientation, the overarching principles of equality and non-discrimination suggest that the design and management of sites should be inclusive of all residents, regardless of sexual orientation and consider the diverse needs of all individuals, including those of varying sexual orientations.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.
Marriage and civil partnership	Positive	There are no explicit mentions of marriage or civil partnership in the updated guidance documents. However, accommodation assessments consider household compositions, which may include married couples or civil partners. The guidance also acknowledges the importance of respecting family units and household structures in site management.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.
Children and young people up to the age of 18	Positive	The updated guidance encourages access to safe, stable accommodation that supports the wellbeing of children. The Children's Right Impact Assessment provides more detail on the positive impact the publication of the 4 updated guidance documents will have on children.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.

Low-income households	Positive	The updated guidance documents recognise the economic challenges faced by Gypsy, Roma and Traveller communities and emphasises the importance of affordable and suitable accommodation options to address inequalities and improve living conditions. The Managing Unauthorised encampments guidance in particular advises authorities to consider the socio-economic circumstances of residents before taking enforcement action.	N/A as perceived impacts are positive. If there is limited uptake of the guidance by local authorities, policy officials will follow this up with public officials during regular monitoring meetings.
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Human Rights and UN Conventions

Do you think that this policy will have a positive or negative impact on people's human rights? *(Please refer to point 1.4 of the EIA Guidance for further information about Human Rights and the UN Conventions).*

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
	Positive	A respect for fundamental human rights as well as equality is built into all Welsh Government work. The updated guidance documents include frameworks for local authorities to improve outcomes and lives for Gypsy Roma and Travellers in Wales. There is a mixture of statutory and non-statutory guidance, for example the Guidance for Undertaking Gypsy & Traveller Accommodation Assessments includes a statutory requirement under the Housing Wales Act 2014	This IIA will be reviewed within 5 years of the publication of these updated guidance documents. The published guidance documents will be reviewed to ensure it remains fit for purpose and in line with changing statutory duties.

		requiring local authorities to assess and submit local GRT accommodation needs assessments to Welsh Government. Whilst the guidance for both designing and managing Gypsy and Traveller Sites are non-statutory best practice guides aimed at aiding local authorities when designing sites. All 4 guidance documents seek to improve the lives of Gypsy, Roma and Traveller community members.	
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