

Review of the role, structure and social inclusion remit of the National Traveller Money Advice and Budgeting Service

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20th January 2014

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Executive summary and key judgments

National Traveller MABS (NTMABS) has two key purposes: to build capacity within the Traveller Community in Ireland to access legal and affordable saving and credit; and to work to ensure access to financial services for the Traveller community. The financial situation for many Travellers is linked to problems of financial exclusion and literacy; and low incomes.

This review was carried out in autumn 2013. It involved a review of documentation; consultations with key stakeholders (staff, board, Citizens Information Board (CIB), MABSndI, local Money Advice and Budgeting Services (MABS) services, Traveller organizations) and others familiar with its work. 37 informants were involved in the review. There was as a focus group with a NTMABS Traveller consultative forum and a survey.

NTMABS has a staff complement of four (FTE) and a board of nine. Its financial resources (€325,000 annually) are spent on staff (63.4%), fixed costs, rent and administration (21%), programmes and projects (10.7%) organizational development (2.7%) and other costs (2.2%).

NTMABS has substantial outputs in the field of community education; local area development; alternative savings and credit options; information, research and policy; and organizational development. Products include the website, which has a growing use; two newsletters; annual reports; external media; policy submissions and research. NTMABS is well linked to other Traveller and social policy organizations.

The alignment of NTMABS within the architecture of MABS, MABSndI, the CIB and the CISs is complex. NTMABS is only one of two national MABS services alongside 51 local MABS services. The presence of a specialized service like NTMABS, while it might appear unusual, was found within the review to be useful given its focus on mainstreaming Travellers into local MABS services. The NTMABS role was found to be complementary to other CIB structures, with suggestions made in relation to the achievement of further cohesion.

NTMABS was found to be highly valued both within the Traveller community and by Traveller organizations. For Travellers, it was regarded as a rare and valued form of state recognition of the particular needs of the Traveller community.

NTMABS was also found to have made valiant efforts to engage with local MABS services, but it was the case that not all were responsive, with progress impeded by the continuing lack of application of an ethnic identifier within the MABS system in particular.

NTMABS has undertaken significant piloting work in the area of loan schemes and social policy. The loan schemes, whilst individually valuable, have yet to lead to successful mainstreaming and generate a considerable administrative burden for the small NTMABS team.

While NTMABS is collaborative and horizontally well-networked, it has yet to make inroads into the institutions concerned with financial exclusion and engage vertically with the political and administrative system. It could also profit from developing a strong European dimension to its work. Although NTMABS does not deal directly with clients, it does take a limited number of referrals (36 in 2012). Here, we suggest that NTMABS not accept routine referrals, but that it should take complex cases beyond the capacity of local MABS and develop a strategic casework role that will systemically address and remedy financial exclusion for Travellers.

Although NTMABS is an effective organization, we found a number of aspects where it was under-developed, so recommendations were made to feed into the ongoing work on the re-development of its website: to develop its national media profile; and to sharpen its documenting and recording systems. There is also scope for the board to take a more leading role in the field of financial exclusion, for skills to be added (media, metrics, documentation), with public recruitment and the involvement of the new generation of Traveller leaders.

The principal conclusion of the evaluation is that there is scope for NTMABS to be more ambitious, to reduce the time and energy spent on comparatively low-level tasks and functions and take on a more challenging, leading role in engaging with the political-administrative system concerned with financial exclusion; develop strategic casework that will drive systemic change; build connections to European solutions to indebtedness; and increase its media footprint. These tasks are appropriate to the high skills and experience levels already present within the organisation. To assist the process of refocussing NTMABS and re-prioritising its activities, suggestions have been made as to those tasks which should be stopped, reduced, increased and started. The report has identified 15 recommendations in the fields of structures, strategy and operations, which, if implemented have the capacity to enhance the performance and impact of NTMABS.

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Terms of reference

The Citizens Information Board sought a review of the role, functions and structure of NTMABS, its appropriate alignment with a) the CIB, b) MABS and c) Citizens Information Services (CIS); and its social inclusion remit, to include its value and effectiveness in relation to the enhancing access to financial services for the Traveller community.

The terms of reference for this evaluation set four over-arching objectives:

1. Review the role, value, extent and nature of the relationships between NTMABS, MABS the CIS and the CIB;
2. Review the role and value of NTMABS to the Traveller community;
3. Examine the value of the piloting and social policy work of NTMABS' work;
4. Identify and assess the effectiveness and efficiency of NTMABS.

These were spelt out in depth in 19 areas, details of which are provided in annexe 1. In carrying out the task, a chapter of the report was allocated to an examination of each of the objectives (chapters 3, 4, 5 and 6 respectively).

Method

This research was carried out by:

- Review of key NTMABS documents, reports, publications, submissions, annual reports and accounts, so as to contribute to the achievement of objectives 1, 2, 3 & 4. NTMABS helpfully provided a drop-box facility to access its e-files;
- Consultations with MABS (including MABSndI), CIS and CIB, to address objective 1;
- Consultations with the NTMABS staff team and board members, to contribute to the achievement of objectives 1, 2, 3 & 4, NTMABS using survey questions to invite views from Community Health Workers;
- Interviews with the Traveller organizations; those who have benefitted from its activities; agencies, organizations and individuals familiar with its work and products; including a focus group; to address objective 2.

A list of those who should be interviewed was agreed between the CIB and the researchers, the CIB sending out letters of invitation in advance to ask for cooperation with the evaluation. People were interviewed on a not-for-attribution basis. Interviews were carried out by a combination of person-to-person and by telephone. The project was overseen by a steering committee which met three times.¹

This is a contemporaneous review, designed to take an overview of MABS now. It does not attempt to follow the entire organizational trajectory of NTMABS from its formation. The general time anchor will be the five-year frame since 2008, with a focus on the period of the *Strategic plan 2010-2012*.

¹ Seán Mistéil, Eileen FitzGerald (CIB); Nancy Power, Colin Thomson, Nuala Ní Ghabhann (NTMABS). Dolores Murphy assisted as secretary to the group.

Acknowledgements

We wish to acknowledge the help and cooperation that we received from the Citizen's Information Board, NTMABS, MABS services and other agencies, organizations and individuals who contributed to this evaluation by the provision of information, interview and in other ways. We thank the following:

Seán Mistéil, Citizens Information Board	Belinda Mac Greal, MABS North Galway
Eileen Fitzgerald, Citizens Information Board	Bridget Clarke, MABS Clondalkin
Geralyn McGarry, Citizens Information Board	Siobhan Brown, MABSndl
Josephine Henry, Citizens Information Board, Board Member	Patrick Power, MABSndl
Colin Thomson, NTMABS Board (chairperson)	Carol Dunne, MABSndl
Paul O'Sullivan, NTMABS Board	Michael Culloty, MABSndl
John Hanley, NTMABS Board	Colette Spears, Irish Traveller Movement
Suzie McCarthy, NTMABS Board	Damien Walshe, Irish Traveller Movement
Lena Lawrence, NTMABS Board	Fran Keys, Pavee Point
Nancy Power, NTMABS Coordinator	Missy Collins, Pavee Point
Nuala Ní Ghabhann, NTMABS Coordinator	Maria Joyce, National Traveller Women's Forum
Liz Daly, NTMABS National Support and Development worker	Emma Jane Hoey, National Traveller Women's Forum
Dermot Sreenan, NTMABS National Education Worker	Thomas McCann, Traveller Counselling Service
Margaret Collins, NTMABS Administrator	Ciara Ridge, Traveller Visibility Group, Cork
Temitope Animashaun, NTMABS Finance Administrator	Jim O'Brien, Bray Traveller Group
Ciara Murray, Independent researcher	John-Mark McCafferty, Society of St Vincent de Paul
Stuart Stamp, Independent researcher	Deborah Dwyer, Development Manager, Meath Citizen Information Service
Margaret Gallagher, MABS Donegal North	
Joe Nevin, MABS Sligo	
Yvonne Bogdanovič, MABS Limerick	

A focus group was organized in Balbriggan on 21st October and we are grateful to all those who contributed: Suzie McCarthy, Lena Lawrence, Winnie Lawrence, Mary McDonnell, Winnie McDonagh. Stuart Stamp kindly provided commentary on the draft of chapter 1 and contributed to Table 1.2. We are grateful to Nuala Ní Ghabhann for responding to multiple, detailed requests for information and similarly to Colin Thomson. NTMABS sent out a survey for views and information from Traveller community health workers and we are grateful for responses from Longford (Frances Swaray) and Wicklow (Liz O'Brien). Seán Mistéil provided valuable assistance in coordination, support and assisting with setting up interviews.

1! Context

This chapter sets the backdrop to this study, debt and financial exclusion (1.1), reviews what is known of financial exclusion in the Traveller community (1.2), before moving on to the current institutional architecture of money management and advice (CIB, CIS, MABS and NTMABS) (1.3), before conclusions are made (1.4).

1.1! Backdrop: debt and financial exclusion

Debt has always been an aspect of poverty in Ireland, featuring in literature from the 19th century ('gombeenism') and the formation of the early credit unions.² The 1970s saw poverty reappear in the public discourse, initially focused on groups and communities where incomes and living standards were exceptionally low. In the following decade the broader, French-derived concept of social inclusion (and its obverse, social exclusion) was applied, in which poverty was redefined around access to the resources of society of multiple types and forms (e.g. fuel) and participation in decision-making and the political processes. 'Financial exclusion' was a particular subcategory, investigated in its early years by the Combat Poverty Agency (1986-2009), taking the form of *Moneylending and low income families*, which explored the nature of indebtedness and made recommendations for the raising of low incomes, alternative credit and the regulation of moneylending.³ The agency's later *Financial exclusion in Ireland* proposed a comprehensive range of measures to tackle financial exclusion, embracing universal banking, access to credit, education and advice, legislation and money advice and budgeting.⁴ With unusual symmetry, one of the last studies of the agency before its abolition concerned the same topic, its 2009 study providing the most comprehensive recent picture available, giving us data on the financial circumstances of those in poverty and the characteristics of their exclusion.⁵ To conclude the inventory of landmark reports, the most recent is *Financial exclusion and over-indebtedness in Irish households* of the Economic and Social Research Institute (ESRI), one of whose key findings was that 'income inadequacy rather than a high level of personal consumption is a key factor in over-indebtedness in Ireland'.⁶

² See this author: *The emergence of the western problem in the Irish economy in the latter part of the 19th century and its persistence into the early years of the 20th century, with special reference to the work of the Congested Districts Board for Ireland, 1891-1923*. Dublin, University College Dublin, unpublished thesis, 1986, 129-134.

³ Daly, Mary, with Walsh, Jim: *Moneylending and low income families*. Dublin, Combat Poverty Agency, 1988. Financial exclusion is defined by the European Commission in *Financial services provision and prevention of financial exclusion* (2008) as 'a process whereby people encounter difficulties accessing and/or using financial services and products in the mainstream market that are appropriate to their needs'.

⁴ Corr, Caroline: *Financial exclusion in Ireland - an exploratory study and policy review*. Dublin, Combat Poverty Agency, 2006. See also Combat Poverty Agency: *Tackling financial exclusion in Ireland, policy statement*. Dublin, Author, 2008.

⁵ Stamp, Stuart: *An exploratory analysis of financial difficulties among those living below the poverty line in Ireland*. Dublin, Combat Poverty Agency, 2009.

⁶ Russell, Helen; Maître, Bertrand; & Donnelly, Nora: *Financial exclusion and over indebtedness in Irish households*. Dublin, Department of Community, Equality & Gaeltacht Affairs and Economic and Social Research Institute, 2011.

Between them, two important conclusions emerged. First, low income debt was different in nature from the population as a whole, being characterized by personal money-lending (legal and illegal); lack of mainstream banking (67% of those below the poverty line unbanked); and costlier debt. Debt focused on utilities, rent and hire purchase, rather than mortgages, credit cards and overdrafts and was especially vulnerable to income shocks (e.g. unemployment, pay cuts). Second, a policy approach focused only on money management was inadequate: a more comprehensive approach (e.g. improved access, promotion of financial literacy, easier forms of credit, fresh start debt settlements, socially-orientated financial institutions) was necessary, one that would bring Ireland more into line with continental European practice.⁷

Levels of financial exclusion in general and debt in particular are intrinsically difficult to track or measure. The celtic tiger period and the subsequent economic and social crisis that broke in 2008 presented a double problem: first, lending rose between 700% (credit) and 1,000% (mortgages) over 1995-2008 and second, incomes then contracted sharply, reducing the ability to repay such high levels of debt. The proportion of loans in arrears rose from 5.4% in 2008 to almost 20% in 2013. Household debt, although declining as households restructure their debt, is currently estimated at €174bn, over 204% of disposable income and over 100% of GDP, the second highest in Europe, averaging €37,928 per household.⁸ These figures exceed the sovereign debt level of €92bn consequent upon the government decision of 27th September 2008 to accept responsibility for all bank loans.

The original government response to debt was the Money Advice and Budgeting Service (MABS), part of which is the focus of this study. Five projects to address indebtedness were piloted from 1992: because of their success, they evolved into a nationwide MABS in mid-decade, an approach and service praised internationally.⁹ The overall Irish response to debt has been criticized, when matched against the continental European countries, as limited in scale, conservative in nature, focused on the disciplining of the indebted, more likely to alleviate than resolve unequal financial relationships.¹⁰

The economic and social crisis prompted a fresh re-examination of debt, the outcomes being the Cooney, Keane and Law Reform Commission reports.¹¹ The government eventually introduced legislation, the Personal Insolvency Act 2012, to establish the Insolvency Service of Ireland (ISI), accompanied by Personal Insolvency Practitioners

⁷ Gloukoviezoff, G.: *Understanding and combating financial exclusion and over-indebtedness in Ireland - a European perspective*. Dublin, The Policy Institute, University of Dublin (Trinity College), undated.

⁸ See Central Bank: *Macro-financial review, 2013:1* and *Quarterly bulletin 2013:Q3*; Department of Finance: *Review of 2012*; Dublin, author, 2013 for a fuller exploration of the present figures.

⁹ Korczak, D: *The Money Advice and Budgeting Service Ireland – synthesis report of the peer review meeting in Cork, 18-19 November 2004*. Report for DG Employment, Social Affairs and Equal Opportunities. Brussels: European Commission, 2004.

¹⁰ Stamp, S. (2011) *The impact of debt advice as a response to financial difficulties in Ireland*. Social policy and society. vol 11, No. 1, pp: 93-104.

¹¹ *Report of the mortgage arrears and personal debt expert group; Report of the interdepartmental mortgage arrears working group*. Dublin, Department of Finance, 2010, 2011: Law Reform Commission: *Alternative dispute resolution - mediation and conciliation*. Dublin, author, 2010.

(PIPs), the revised Code of Conduct on Mortgage Arrears (CCMA) and the Mortgage Arrears Resolution Process (MARP). The approach was criticized by some groups both for its system of private delivery when a public one was needed and for creditor veto, forcing an unfavourable contrast between the socialization of bank debt and the individualization of personal debt.¹² These solutions, whilst relevant to those large numbers in mortgage debt, had much less relevance to those without mortgages, such as Travellers. The Department of Finance published, with a disclaimer, a *Strategy for financial inclusion* which, despite its broad title, dealt initially only with ways of introducing people on low incomes to basic payment accounts.¹³ Non-Governmental Organizations (NGOs), such as the Free Legal Advice Centres (FLAC), have proposed a range of measures to broaden and make more socially inclusive the approach of government to the debt crisis.¹⁴

1.2! Financial exclusion and Travellers

There are 29,573 Travellers in Ireland (2011 census), up 32% on 2006, although the true figure may be higher. Travellers have a long history, one now becoming better known. Travellers have suffered from discrimination, poverty, social exclusion, limited educational opportunities, hardship in accommodation, unemployment and poor health, issues now well documented and which need not be repeated here.¹⁵ Since the start of the economic and social crisis, Travellers have, like others, suffered from fewer economic and employment opportunities, reduced social welfare payments and a contraction in the infrastructure of Traveller organizations and services. For example, of 40 original primary healthcare projects, a flagship programme, only 30 remain. Financial exclusion, unsurprisingly, is another feature of the exclusion of the Traveller community. We do not have detailed information on patterns of borrowing, saving, incomes or outgoings in the Traveller community. Both out of preference and because of the difficulty of raising money from the institutions of the settled community, Travellers tend to rely on their own community for borrowing. We do not have precise figures on Traveller use of money advice and budgeting services because, although recommendations have been made that there be an ethnic identifier, this has not been applied; nor do we have such information from the credit unions.¹⁶

¹² Stamp, Stuart: *Socializing the loss, personalizing the responsibility and privatizing the response - the Irish policy approach to personal debt post 2008*. Maynooth, Centre on Household Assets and Savings Management, 2013.

¹³ Department of Finance: *Strategy for financial inclusion*. Undated, no locator.

¹⁴ Free Legal Advice Centres & others: *Personal and mortgage debt - nine key principle to overcome the personal debt crisis*. Dublin, authors, 2011.

¹⁵ For a demographic picture, see Central Statistics Office: *Census 2011 - profile 7: religion, ethnicity and Irish Travellers*. Dublin and Cork, 2011; for a social and political context, see Pavee Point: *Irish Travellers and Roma, shadow report - response to Ireland's third and fourth report on the International Convention on the Elimination of all forms of Racial Discrimination (CERD)*. Dublin, author, 2011.

¹⁶ NTMABS *Annual report, 2010* (p22) recorded that NTMABS had made representations to the MABSIS Review panel on the importance of introducing an ethnic identifier, stating that this was 'vital' and 'necessary'.

Since the economic and social crisis, the situation of Travellers has been exacerbated by substantial reductions in state funding for Traveller services and infrastructure.¹⁷ As an example, Traveller Accommodation Programmes (TAPs) have been cut from €70m to nearly €4m over the last number of years.¹⁸ This cut in funding, coupled with an increase in the total Traveller population, has resulted in Travellers having to access other accommodation options including private rented and shared housing. See Table 1.1 for details of the changes in the accommodation types used by Traveller families over the period 2010-2012.

Specific Accommodation Type	2010		2011		2012		Trend 2010-2012
	No	%	No	%	No	%	
Accommodation provided by/with local authority assistance	5634	59%	5595	59%	5568	56%	Decrease -1%
Unauthorised sites	444	4.5%	327	3.3%	330	3.3%	Decrease -25%
Own resources (estimate)	561	6%	563	5.9%	580	6%	Increase +3%
Private rented (estimate)	2468	26%	2558	26.8%	2829	28.5%	Increase +15%
Sharing housing	451	4.5%	492	5%	604	6.2%	Increase +40%
Totals	9558		9535		9911		

Accessing private rented accommodation in particular can be difficult for Travellers because landlords are not always prepared to have Travellers as tenants and they may require payment of up to three months' rent in advance. This in turn can be causing significant financial hardship and can lead Traveller families into debt.

We do have some information on the nature of financial exclusion in the Traveller community, thanks to the early work of NTMABS, Traveller organizations and other researchers, covering access to financial services both nationally and in Dublin.¹⁹ Alternative forms of credit suitable to the Traveller community have been examined, *Creditable alternatives*.²⁰ From these studies, a number of conclusions emerged. First,

¹⁷ Pavee Point: *Travelling with austerity - impact of cuts on Travellers, Traveller projects and services*. Dublin, author, 2013.

¹⁸ M. Hennessy, M: *Irish Travellers' leader warns of a direct action campaign to come*. *Irish Times*, 15th November 2013.

¹⁹ Quinn, Paul & McCann, Thomas: *Access to credit facilities for the Traveller community in the greater Dublin area*. Dublin, Exchange House MABS, 1997; *Hard to credit it - access to credit facilities for the Traveller community*. Dublin, Exchange House MABS, 2001; NTMABS: *Financial exclusion: failure to access financial services*. Dublin, NTMABS, 2006;

²⁰ Quinn, Paul & Ni Ghabhann, Nuala: *Creditable alternatives: an exploration of new models of affordable savings and credit options in use worldwide which may be adapted by the Traveller community in Ireland*. Dublin, Exchange House Traveller Service, 2004.

forms of financial exclusion that affected low-income groups (1.1) were different from and more severe for Travellers. The rate of unemployment in the Traveller community, now 85% against a national rate of 14%, means that its financial resources are exceptionally limited. Literacy levels among adults are low. Lack of access to mainstream credit means that Travellers are dependent on personal money-lenders, many of them illegal, who charge the highest rates of interest and penalties, but have the advantage of providing informal, immediately available, no-questions-asked cash with no need for collateral. Some Travellers beg door-to-door to supplement their low incomes. Apart from credit unions, membership of mainstream financial institutions appears to be low.

Creditable alternatives provides a profile, albeit a dated one, of Traveller use of MABS from the experience of Exchange House MABS, which provided a direct service to Traveller clients. They were mainly (87%) women, reflecting their responsibility for money management in the Traveller community, with social welfare their main form of income (96%). Just over half were members of a credit union, where savings were primarily used to buy a replacement caravan. Only 22% had bank accounts, with many denied accounts due to bank refusals of identity documents presented, often contrary to guidelines issued.²¹ Although this was not a problem unique to Travellers, it affected them severely.²² Traveller needs for credit tended to spike around a number of planned and unplanned events: weddings, funerals, Christmas, cars, school expenses, such expenses ranging from the micro to the medium and large, but each creating its own form of peer pressure and resultant financial stress.

More recent information comes from *Issues of personal finance within the Traveller community* (2010) and *Debt and dying* (2012).²³ These found a continuing pattern of low Traveller incomes, denied and low access to mainstream financial and credit institutions (e.g. identity issues), a high level of use of illegal moneylenders, a particular problem of accommodation-related debt (e.g. costs of caravans, insurance, utilities and rents) and the high costs of planned and unplanned life events. The last, *Debt and dying* established the practice within the Traveller community of paying substantial funeral and related costs (e.g. headstones) as a means of honouring and respecting the dead, but a tradition that can have considerable negative consequences in indebtedness.

Consultation with experts indicates that the overall pattern of debt has changed little since the first research since the 1980s. The celtic tiger period brought into the house-owning net (and subsequent debt) people who would not previously have been

²¹ Department of Finance: *Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 Guidelines On the prevention of the use of the financial system for the purpose of money laundering and terrorist financing* February 2012. <http://www.finance.gov.ie/documents/guidelines/CriminalJustice2012.pdf>

²² NTMABS: *Briefing paper on financial exclusion*. Dublin, author, 2006; Eyanga Ekumeloko, Jean-Pierre: *Minorities and financial inclusion in Ireland*. Presentation at Migrants and financial inclusion workshop, Mainz, Germany, 18th September 2009.

²³ Stamp, Stuart (ed): *Issues of personal finance within the Traveller community*. Dublin, NTMABS, 2010; Stamp, Stuart; Murray, Ciara; & Boyle, Maura: *Debt and dying - understanding and addressing the impact of funeral costs for Travellers in Ireland*. Dublin, NTMABS, 2012.

candidates for home owners, creating a new layer of low-income debt. One aspect of the problem which may be understated is independent evidence that those on low incomes have been and are competent money managers, all the more remarkable granted the pressures under which they have fallen.²⁴ Likewise, even though many Travellers experience debt, others successfully avoid it, likely experiencing some hardship to do so.

Local MABS services and other informants were able to give us a current picture of Traveller debt and use of service:"

- The main causes presenting were utilities, rents, rent arrears and fines. Travellers had few debts characteristic of mainstream debt (e.g. mortgages, credit cards, direct debit);
- Travellers will use services when they are in crisis e.g. utility cut-off. Utility reconnections may present particular problems that cause debt (current cost of a Bord Gais re-connection is €1,144.02);²⁵
- Most are women, but bills are normally in their husband's name;
- There are cultural differences in Traveller use of services, to which services tried to adapt: Travellers come in extended family groups (mother, children, granny); expect prompt advice; and generally do not come for pre-arranged appointments. Many will come in for a once-off crisis, but do not plan or wish to come in as regular clients;
- The persistence of moneylending, much of it illegal, associated bullying and bad practice (e.g. moneylenders sequestering welfare payments).

In one MABS, Travellers accounted for 80% of fine debt, mainly for illegal trading, public order offences and traffic-related, typical fines being €400. It had set up system with the Garda station whereby, on the presentation of a note from MABS, the Gardaí would accept a two-month repayment period, with a savings system set up accordingly.

Expert, informed impressions are that Travellers are greater users now of both post office savings and credit unions than before, probably an outcome of increased efforts by both MABS in general and NTMABS in particular. The squeeze on Traveller incomes has been made more severe, because, according to unconfirmed but consistent reports, Exceptional Needs Payments (ENPs) from community welfare officers have been much reduced or even no longer available, closing off an avenue for the management or relief of debt. As noted in table 1.1, the proportion in private rented accommodation has grown significantly.²⁶ Some find the costs of living in private rented unaffordable, so they return to a site possibly alongside parents, family members or relatives. This necessitates buying a trailer, which may be a further occasion of debt.

²⁴ Daly, Mary & Leonard, Madeleine: *Against all odds - family life on low income in Ireland*. Dublin, Combat Poverty Agency, 2002.

²⁵ Finglas Ballymun Traveller Primary Healthcare Project report to Primary Health Care Partnership, 7th October 2013. Here, 65 families were disconnected for several months because of alleged tampering.

²⁶ *The Traveller*, Parish of the Travelling People, summer 2013.

One observer of the Traveller community offered the following picture of its financial situation (Table 1.2). Incomes of the Traveller community are, like the settled community, tiered, with the lower tiers more vulnerable to debt.

Table 1.2: Picture of Traveller incomes and debt
Earning good income
Modest income
Barely making it, just avoiding debt
Occasional debt, assisted by relatives, maybe credit union
Systemic debt. This is the problem group upon which NTMABS must continue to concentrate, the poorest group within the Traveller community. Here, there is no external income, no history of saving, low literacy, and no use of credit union or MABS. There may be complications of substance abuse (e.g. alcohol), even of prison. There may be a history of moneylending, or dole handed over at point of collection.

This table highlights the three groups on which a money advice and debt service should concentrate: those in systemic debt, followed by those in occasional debt, with an important preventative role for those just avoiding debt.

1.3! Organizational architecture

Citizens Information Services date to the National Social Service Council (1970), reformed in its current iteration as the Citizens Information Board (CIB) (2000). This is the statutory body with responsibility for information, advice and advocacy services on the broad range of social services and welfare entitlements, working through 42 Citizens Information Services (CIS) operating from 268 locations; the Citizens Information Phone Service (CIPS) and the Citizens Information Website. Legally and technically, CIS comprises 43 independent organizations. Membership from CIS boards is typically drawn from the voluntary and community sector, including MABS and statutory bodies (e.g. Department of Social Protection, Health Service Executive and local authorities). The CIB was assigned responsibility for the Money Advice and Budgeting Service (MABS) in 2009. The NSSB and CIB had responsibility for the provision of training and community education for MABS from 1996 to 2006.

MABS generally provides a free, confidential, non-judgmental and independent service countrywide for people with debt problems or over-indebtedness. It is made up of 51 local companies and two national companies (NTMABS and MABSndI), 53 in all, with 63 offices. Legally and technically, MABS comprises 53 independent organizations. Membership of local MABS boards is, according to those familiar with them, typically drawn from financial institutions (e.g. credit unions), statutory bodies (e.g. Department of Social Protection, HSE, local authorities), CISs and voluntary organizations (e.g. Society of St Vincent de Paul, centres for the unemployed), with two reported to have Traveller representatives thereon (Ballyfermot, Tuam).

Annual funding for MABS in 2013 was €18.988m. There is a common data collection system held by MABSndI, called MABSIS. MABS had 26,163 active clients in 2012, with 24,262 helpline clients.²⁷ Because of its decentralized nature, MABS does not have its own strategic plan but operates under the Citizens Information Board *Statement of strategy 2012-2015*, which sets five priorities (information, advice, advocacy and budgeting needs; consistent, quality services; an integrated service delivery model; designing and implementing creative and flexible responses; measurement of efficiency and effectiveness) and specifies therein a review of NTMABS.

The National Traveller MABS (NTMABS) is one of the MABS national companies. Its predecessor was Exchange House MABS, set up 1998, re-formed as NTMABS on 1st January 2005. Its purpose is to build capacity within the Traveller community in Ireland to access legal and affordable saving and credit; and to work to ensure access to financial services for the Traveller community. A key element to understanding its work is that, unlike its Exchange House precursor, it does not provide direct services to clients, but rather it acts to:

- Support to MABS and the Traveller community to ensure Travellers can access MABS Services;
- Identify ways to empower Travellers to access legal and affordable credit, building capacity through its community education work;
- Promote alternative methods of money management through its project work;
- Highlight issues of over-indebtedness and exclusion from financial institutions, making appropriate responses through its research and policy work

Key NTMABS current areas of work include community education; local area development; equality; and policy and research. The level of funding has been relatively steady, increasing over the five years 2008 -2012 from €261,829 to €345,371 in 2012, with a fall in funding in 2013. NTMABS was identified by the European Foundation for the Improvement of Living and Working Conditions as an exemplar of an advisory service for an ethnic minority.²⁸

From the start, NTMABS developed a series of policy positions to promote financial inclusion in general and for the Traveller community in particular.²⁹ NTMABS developed practical resources designed to assist local MABS offices to work with Travellers, such as a guide to Traveller sites.³⁰

²⁷ For a picture of MABS' current work, see Bennett, Colette: *MABS clients and mortgage arrears - profile of MABS clients in mortgage difficulty and factor associated therewith*. Dublin, MABSndI, undated. For a broad review of MABS, see Comptroller & Auditor General: *Accounts of the public services, 2008*. Dublin, author, 2009; for most recent statistics, see MABS: *Statistics Q2 2013* from www.mabs.ie and Citizens Information board: *Annual review 2012/2013*. Dublin, author, 2013.

²⁸ Dubois, Hans: *Household debt advisory services in the European Union*. Dublin, author, Eurofound, 2011.

²⁹ *Briefing paper on financial exclusion, 2003; Portfolio of case studies, 2004; Creditable alternatives, 2004; Accessing financial services, 2005.*

³⁰ NTMABS: *Resource publication designed for MABS offices nationally on Traveller population and accommodation in Ireland*. Dublin, author, 2006; updated, 2nd edition, 2008.

NTMABS has a *Strategic plan 2010-2012*; it's third, with a fourth strategy now in preparation but paused until the outcome of this review. The present strategy commits the organization to the principles of equality, empowerment, inclusion, diversity, partnership and sustainability and sets down seven key strategic priorities (community education, local area development, alternative credit options, information, research and policy, equality across all financial and related services and organizational development). The *Strategic plan 2010-2012* then lists its commitments in each, accompanied by a set of quantitative and qualitative indicators.

The legal form of the NTMABS is a company limited by guarantee under the Companies Acts, 1963-2005, the typical form of an Irish Non-Governmental Organization (NGO), with a memorandum and articles of association. This commits NTMABS to a set of charitable objectives, the principal being the integration of the disadvantaged, especially the Traveller community in accessing affordable and legal credit and other financial services; with 19 subsidiary objectives (A to U), many of which are technical but which include the support of the Traveller community, advice to local MABS services and the promotion of changes in policy and practice.³¹

1.4! Conclusions

There are three conclusions from examination of the context. First, this review takes place against a backdrop of both a sovereign and personal debt crisis in the Irish state. Although debt has a high level of topicality, problems of financial exclusion have been known since the late 1980s, being outlined in a series of reports from Combat Poverty Agency and the Economic and Social Research Institute. Financial exclusion in the Traveller community is a distinct subset, Table 1.3 summarizing the key characteristics:

³¹ NTMABS: *Memorandum of association; Articles of association*. Dublin, author, undated.

	<i>General</i>	<i>Low incomes</i>	<i>Travellers</i>
Presenting	Large amounts secured and unsecured debt Wide range of secondary creditors Debt incurred for range of purposes, essential and luxury Debt owed to mainstream services Major credit rating concerns	Lesser amounts of secured, unsecured debt Smaller range of secondary creditors Debt incurred primarily for essential purposes Debt owed to utilities, local authorities, non-mainstream Credit rating an issue, but main credit unions	No secured debt Specific types of secondary creditors Debt primarily for life events, planned, unplanned Debt owed more to family, illegal lenders Little or no credit rating to start with
Solutions	Budgeting income Helplines, self-help CCMA/MARP Debt settlement, personal insolvency arrangements	Adequate income One-to-one (MABS) services MABS protocols, voluntary arrangements Debt relief notices, tackling illegal moneylending	Community education Alternative credit Alternative savings, payment facilities
		Basic banking Access to credit Access to savings, payment facilities	

While this table runs the risk of being over-simplified, it does emphasize the importance of the socially differential nature of debt and the need for tailored solutions for each group. So far, though, the solutions have been primarily geared to general debt holders, especially those with mortgage debt, rather than more excluded groups. Second, there is a well-established and mature structure in place to provide both citizen information advice in general and money advice in particular. MABS services dates to the early 1990s and Traveller services to the late 1990s, so there is a considerable body of experience, institutional memory and knowledge against which the current work and performance of NTMABS may be tested. A third conclusion concerns the points of reference for the development of these services in Ireland. Although both MABS in general and NTMABS particularly have been commended as European exemplars, a worrying feature stressed by independent commentators is the relatively limited nature of the Irish response to debt with its focus on individual, disciplined money management and the much lower level of attention given to broader solutions (e.g. prevention; legally-based debt settlement; sufficient incomes to enable people to manage and save), solutions more in evidence in continental Europe.³²

³² E.g. Stamp, 2009; Eurofound, 2011, *op cit*.

2! Overview: NTMABS inputs, activities, outputs

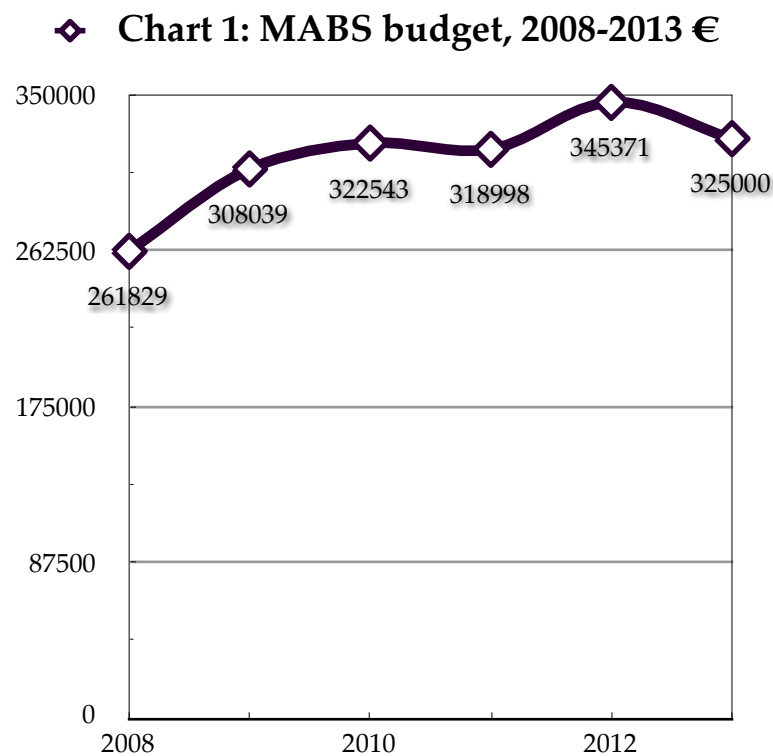
This chapter reviews the inputs (2.1), activities and outputs (2.2) of NTMABS. Conclusions are drawn (2.3).

2.1! Inputs

The inputs to NTMABS comprise financial resources; staff resources; Board resources; and assistance from CIB and the Traveller community and each is reviewed in turn (2.1.1-2.1.4).

2.1.1! Financial resources

The current budget of NTMABS is €325,000, used to fund staffing, offices and activities. Chart 1 shows the evolution of the NTMABS budget from 2008.



As may be seen, there has been an overall upward trend, but with down-trends for 2011 and 2013. Overall, funding in 2013 is 24% higher than at the start of the period, remarkable granted reductions affecting most other fields of social spending. Funding comes entirely from a dedicated budgeted line under the Citizens Information Board and is provided through a service agreement which lays down the formal relationships

and responsibilities between the two.³³ To analyze spending, we have figures available for 2012.³⁴

Table 2.1 gives the main heads of spending in 2012. NTMABS divides headings under employee costs, administration, programmes and projects, organization development and others.

<i>Item</i>	<i>€ details</i>	<i>€ main headings</i>	<i>% of total spend</i>
Staff		225,283\$	63.4%
Staff (salaries, PRSI, pension)	225,283		
Administration\$		74,111	21%
Rent/rates	29,614		
Insurance	4,000		
Repairs & maintenance	3,900		
Cleaning & related	1,390		
Stationery, supplies & printing	7,867		
Mobile phone	3,029		
Staff expenses (e.g. travel)	12,000		
Board expenses	2,000		
Equipment leases	2,000		
Professional fees	6,000		
Postage\$	811		
Other (<i>Petty cash, licence fees, bank charges, etc.</i>)	1,500		
Programmes and projects		38,000	10.7%
Staff training	10,000		
Management training	2,500		
Service promotion (incl. research report)	10,000		
Community education\$	9,500		
Staff support and supervision	6,000		
Organizational development		10,000\$	2.7%
Service delivery & work plan	10,000		
Other		8,000	2.2%
Premises development	8,000		
Total	355,394	355,394	100%

³³ *Service agreement between Citizens Information board and National Traveller MABS, 2012.* The original 2012 service agreement was based on the standard local MABS template, subsequently amended to take account of the particular circumstances of NTMABS. For 2013, NTMABS was again sent the standard template and negotiations on similar amendments have taken place.

³⁴ NTMABS: *Accounting return*, December 2012. Dublin, author, 2013.

Salaries account for just less than two-thirds of spending, which is below average for labour-intensive advice, information and support organizations, which are typically between two-thirds and three-quarters. Rents/rates, when added to premises development, account for 10.6%, which is substantial if unavoidable. NTMABS continues to invest significantly in staff and management training, support and supervision (€18,500, or 5.2%). The effective budget for programmes is quite small (community education, €9,500, or 2.6%), with 'service promotion' possibly more appropriately belonging to 'administration'. Discussions have taken place between NTMABS and the CIB to develop spending heads more appropriate for NTMABS. In an effort to reduce costs, in 2009 a reduction in rent of €8,000 was negotiated as was a reduction in the cost of the pension fund manager of €603.

2.1.2! Staff Resources

In human resources, the complement of NTMABS is 4.0 Full Time Equivalent (FTE), in practice divided between six personnel:

- Coordinator (jobshare);³⁵
- Support and Local Development Worker;³⁶
- Community Education Worker;³⁷ and
- Administrator (jobshare).³⁸

The qualifications and experience of the staff are outlined in Table 2.2.

<i>Post</i>	<i>Qualifications</i>	<i>Experience prior to NTMABS</i>	<i>NTMABS Experience (years)</i>
Coordinator	Certificates counselling, management; diploma, youth and community work	3	14
Coordinator	BA, HDE, MA; diplomas training, management	10	15
National support & development worker	BA, diploma in social studies, FETAC Level 5	5	12
National education worker	Certificates commercial computing, training and education (2), diploma training & education	15	6
Administrator (PT)	FETAC Level 4 (2), Leaving Certificate, ECDL, IPASS	3	11
Administrator (PT)	BA, PASS, national diploma, CPT		6
Total years of relevant experience		36	64

³⁵ Nancy Power and Nuala Ní Ghabhann.

³⁶ Liz Daly.

³⁷ Dermot Sreenan.

³⁸ Margaret Collins and Temitope Animashaun

This is a highly experienced staff team, with 36 years prior experience in voluntary and community organizations and 64 years within NTMABS itself, a total of 100 years. There is a high level of appropriate skills and in addition, staff continue to take educational courses as part of their individual programmes of continuing professional and educational development.

2.1.3! Board Resources

The 2013 board comprised nine people, drawn from or associated with voluntary organizations,³⁹ social finance,⁴⁰ local authorities,⁴¹ health services,⁴² the social work profession⁴³ and Traveller organizations.⁴⁴ It is recruited by invitation with a view to meeting the full range of governance skills required and that Travellers be well represented. This is a skilled, experienced group of medium to senior professionals and Traveller representatives with a high level of knowledge of the Traveller community and social finance, a mixture of professional fields (finance, public administration, social work, health) along with a combination of voluntary and statutory bodies. The board has sub-committees for staff, finance and recruitment (board only), while the others have a wider or external membership. There was a time-limited research subcommittee to oversee the *Debt and dying* research over 2009-2011, which drew in human resources much further afield.⁴⁵ The board meets quarterly. The time contribution of each board member is in the order of 2hr/month for each board meeting and subcommittee. Senior board members spend some time dealing with paperwork and the formalities of the relationship with the CIB, so their time commitment may be greater.

2.1.4! Other human resource assistance: CIB and the Traveller community.

Two senior CIB staff provide liaison between the CIB and NTMABS.⁴⁶ In 2011, Traveller consultative fora were established by NTMABS, comprising representatives of Traveller groups in Dublin (Fingal, based in Balbriggan), Meath, Limerick and Wicklow. These fora provide advice and support, as well as testing the work of NTMABS and are an important contribution to the organization.⁴⁷

³⁹ Colin Thomson, Crosscare, also the chairperson.

⁴⁰ Paul O'Sullivan, Clann Credo; Ken Slattery, Social Finance Foundation.

⁴¹ John Hanley, Dublin City Council;

⁴² Lena Lawrence; Suzie McCarthy, HSE Traveller Health Unit.

⁴³ Bridget Clarke, retired social worker.

⁴⁴ Heydi Foster, Exchange House; Michael McDonagh, Navan Traveller Workshops.

⁴⁵ John Hanley, Heydi Foster (NTMABS board), Nuala Ni Ghabhann, Nancy Power (NTMABS staff); Geralyn McGarry (CIB); Caroline Corr (Department of Social Protection); Catherine Joyce (Blanchardstown Traveller Group); Mary Stokes (National Traveller Women's Forum); Michael Saunders (Kilkenny MABS); and Jacinta Brack (ITM).

⁴⁶ Seán Mistéil, regional manager and Eileen FitzGerald, senior manager.

⁴⁷ NTMABS: *Consultative forum report*. Dublin, author, 2011.

2.2! Activities and outputs

This section assembles the activities and outputs of NTMABS, based on data supplied directly by NTMABS, its staff and documentary record, such as the newsletters and annual reports. They are reviewed under the key strands of its work identified as strategic priorities in the current NTMABS *Strategic plan*: community education; local area development; alternative credit options; information; research and policy; equality across financial and related services, and organizational development (2.2.1-5).

2.2.1! Community education

Community education is the first strand. Its current iteration began as an untitled five-week programme developed by Tuam MABS for Travellers in 2007 and later adapted for national use, then the *Our Garaid* Traveller Money Management Programme.⁴⁸ This was then updated with the help of North Galway MABS, Finglas Cabra MABS and MABSndI and retitled *A way of life money management teaching resource for Travellers*, a five-week community educational programme and training pack. *A way of life* was subject to evaluation by the Traveller consultative forums in Wicklow, Fingal and Limerick, with recommendations made for amendments and additions.⁴⁹ It was first delivered in Cork in late 2012 with 7 participants. *A way of life* was revised in 2012 with five modules (*Managing money, control & budgeting, income maximization, saving and banking, borrowing*). *Way of life* is a substantial 66-page resource, with checklists, lesson plans, set learning outcomes, work plans, notes, animated sections and case studies, presented to a high educational standard.

A new training programme was introduced in 2010 *The cost of moving pre-tenancy course*, a four-session course programme combining information, advice and site visit.⁵⁰ In 2013, NTMABS published *Overcoming illegal debt - facilitators manual*, a 20-page guide designed as a tool to avoid illegal debt and provide pathways out. The guide also includes a short film entitled *A deal's a deal*. This was piloted in Ballymun and Cork and launched 8th October 2013 by Vincent Browne with over a hundred attending.

These community education programmes are supplemented by other training information events and presentations, which are summarized in Table 2.3.

⁴⁸ See Hogan, Elaine & Stamp, Stuart: *Assessment of the materials in money management programme Our Garaid*. Dublin, NTMABS, 2009.

⁴⁹ Sreenan, Dermot: *Evaluation of A way of life*. Dublin, NTMABS, 2012.

⁵⁰ NTMABS: *The cost of moving pre-tenancy course*. Dublin, author, 2010.

<i>Year</i>	<i>Training and information events; presentations</i>
2009	6 training events with MABS services 11 training events with Traveller groups Presentation to prisoners in Loughan House. St Patrick's Young Offenders Institute with a view to a community education programme
2010	Workshop, Tallaght CDP. Training the trainers programme, midlands and south east
2011	<i>A way of life</i> in Arklow and Finglas. <i>Cost of moving</i> , Clondalkin with five families. <i>Theatre of the oppressed workshops</i> , St Margaret's women's group, Ballymun, Dublin. Health information meetings, Ballyfermot, Bray Irish Traveller Movement AGM Dublin Social Inclusion Week Training: St Catherine's Training Centre, Ballyhaunis, co Mayo; Traveller groups in Cabra, Dublin; Arklow, co Wicklow; and to the Midlands Health Network, total 80 participants.
2012	MABS and local Traveller organizations in Mayo, Cork Train-the-trainer courses for money advisors Bray, Ballymun, Ballyfermot, and Cork. 90 Traveller participants, including Traveller Community Health Workers
2013	Ballyowen Meadows financial education programme Clondalkin MABS, Cork MABS

2.2.2! Local Area Development

Local area development is reviewed under four aspects: local area development meetings, common bonds, outreach and the key worker project. The purpose of NTMABS' local area development work is to make MABS more accessible to Travellers locally.⁵¹ The current iteration of this field of activity kicked off with 28 local area development meetings over 2006-9.⁵² Early meetings shed light on why Travellers did not use MABS services (lack of trust), the principal financial issues arising for Travellers (utilities, illegal moneylending, life events) and provided a basis for the extension of the programme to a wide geographical spread: for example, in 2010, Dublin central, Waterford, Tipperary, Galway, Limerick, Cork and Clare, the events being attended by MABS, CICs, Traveller organizations, Family Resource Centres and social workers. Overall, NTMABS held 37 local area meetings over 2009-2011, the outcomes published as *Issues of personal finance within the Traveller community*.⁵³

A second aspect of local area development is common bonds. The 'common bond' is a feature of the work of all credit unions, in this case referring to its geographical field of operation. Its specific relevance to NTMABS is whether common bonds include

⁵¹ NTMABS: *Report of collated suggestions received through local area development meetings (2006-9) and survey of local authority social workers/Traveller liaison workers (2009)*. Dublin, author, 2009.

⁵² NTMABS: *Evaluation report, January - December 2009*. Dublin, author, 2009.

⁵³ Stamp, Stuart (ed): *Issues of personal finance within the Traveller community - a study exploring the findings of the Local Area Development work undertaken by NTMABS 2007-2011*. Dublin, NTMABS, 2010

Travellers within the local common bond.⁵⁴ An example of a Traveller site outside a common bond (that of Ballyfermot) was Labre Park, on the outskirts of Ballyfermot, close to the industrial estate. In 2009 after a number of years of work, NTMABS and the local MABS (called Dublin 10/20 MABS) were successful in convincing Ballyfermot Credit Union to extend its common bond. Expanding this process nationally, in 2010 there was a survey of 131 credit unions to test if Traveller-specific accommodation, in the form of 225 sites and housing schemes, was included in common bonds.⁵⁵ This ascertained that 188 were within, but 37 were unconfirmed (most in Dublin, Galway and Limerick). In an attempt to resolve the situation of those areas where returns were still lacking, the situation was updated in 2013.⁵⁶ Three sites were identified as being not within common bond areas and nine were still to respond. The report was factual and did not draw conclusions or suggest further action.

The third field of local area development was outreach. Following a local area development meeting in Dun Laoghaire in 2008, a monthly clinic was set up in the offices of Dublin Southside Travellers Action Group (STAG) as a project of NTMABS, STAG, Dun Laoghaire MABS and the Primary Health Care Group. This combined group and one-to-one sessions as well as telephoned responses to enquiries. The first report, although it did not give figures, offered a positive assessment.⁵⁷ A second outreach clinic was run from April-December 2011 in Bray, Co Wicklow as a MABS/CIS project. Its formal aim was 'to increase the number of Travellers in Wicklow accessing mainstream MABS and CIS services'. There was a good initial take-up, which fell away and the conclusion was that as a result of word of mouth the mainstream services became so well known that an outreach clinic was no longer necessary, so it was discontinued.⁵⁸ A progress report on outreach work was issued in May 2013.⁵⁹ Following the success of the Dun Laoghaire clinic, ten MABS were contacted to explore their interest in a Traveller outreach clinic. Six failed to acknowledge the request. One said it was not feasible, another offered to circulate information instead and in the third case the board of management made a decision against outreach clinics. Only one expressed interest (Bray).

⁵⁴ 'Common bond' is defined by the Irish League of Credit Unions as 'the factor which unites all the members of your credit union — it is what all members have in common. Because of the common bond, all members have the good of their credit union at heart; they know and trust each other. The common bond ensures that the savings of members are available to fellow members as loans. It also enables credit judgements to be made on character and personal record as well as on commercial risk factor. The most usual common bonds are: community bond (where all the members live, and in some cases work, in a particular locality); occupational bond (where all members are in the same profession or occupation, or work for the same employer); and associational bond (where all the members are in the same society or association) (www.creditunion.ie, accessed 8th November 2013).

⁵⁵ NTMABS: *Review of credit union common bonds and Traveller specific accommodation*. Dublin, author, 2011.

⁵⁶ NTMABS: *Review of credit union common bonds and Traveller specific accommodation*. Dublin, author, 2013.

⁵⁷ NTMABS: *Southside Traveller Action Group and Dun Laoghaire MABS*. Dublin, author, 2010.

⁵⁸ NTMABS: *Note of meeting of stakeholders on 6th July 2012*. Dublin, author, 2012.

⁵⁹ NTMABS: *MABS/CIS outreach clinic report*. Dublin, author, 2013.

The purpose of the key worker pilot was to upskill community healthcare workers in money management and facilitate their making referrals into local MABS and CIS services.⁶⁰ NTMABS established a working group to progress the project, which began in four locations in 2012 (Balbriggan, Wicklow, Cork and Sligo).⁶¹ The rolling out of the programme was uneven, 'not straightforward' but significant progress was made. The concept was that primary healthcare workers be trained by local MABS in the *A way of life programme*, provided with information packs by the NTMABS development worker, given a referral log and attend an information session with the local CIS. Reports have been made for its operation.⁶² The Traveller Primary Healthcare projects in Balbriggan, Wicklow and Cork referred 67 clients to MABS, 66 to CIS, with information distributed to over 230 people over the period January to August 2013.

These activities have been supplemented by many *ad hoc* efforts to persuade Travellers to use local MABS. Specifically, NTMABS promoted, during social inclusion week, the use of the Wicklow CIC mobile bus; distributed MABS information packs to Traveller organizations nationwide; and NTMABS advertisement cards with details of local MABS and CIS to primary health care workers in Wicklow and Limerick (2011). Survey information shows this approach to have been highly impactful, leading to a 50% increase in Travellers taking money advice. NTMABS also distributed MABS/CIS information cards to every Traveller organization and Traveller Primary Health Care Project around the country in 2011.

2.2.3! Alternative Credit Options

Access to alternative forms of credit has been a key issue for Travellers, one pursued by NTMABS. As far back as 2000, a loan scheme was established with the Society of St Vincent de Paul and Exchange House, concluding 2009. Over the period, 14 families availed of the loan fund, with loans to the value of €37,963 issued in 2000.⁶³ With defaults and bereavements, only four were paid in full and €16,024 was still outstanding at the end. The evaluation identified a number of weaknesses in the scheme, such as poor committee management, lack of timeframes and inadequate monitoring and tracking but did not reach an overall judgement over the success of the scheme or not. In partnership with a number of other bodies, NTMABS has established /support one loan and three loan guarantee schemes, as follows. Since 2001 NTMABS has worked with Clann Credo to provide loan guarantees for credit union borrowers nationwide. €40,000 was secured to support access to credit through local credit unions, principally for caravans and their improvement. NTMABS prepares potential borrowers, supports local MABS, works with Clann Credo in

⁶⁰ These workers are formally employed as Primary Care Health Care Workers, and take on the role of NTMABS key workers on a voluntary basis

⁶¹ NTMABS: *Working group terms of reference for the establishment of MABS key worker positions within the Traveller community*. Dublin, author, undated.

⁶² NTMABS: *Key worker report*. Dublin, author, 2012; see also Daly, Liz: *Development, June 2012; MABS session with Balbriggan PHC, 20th November 2012*. Dublin, NTMABS, 2012; October 2013 coordinator's report.

⁶³ NTMABS: *Exchange House MABS and Society of St Vincent de Paul caravan loan scheme evaluation report*. Dublin, author, 2009.

establishing loan amount repayments, liaises with credit unions and monitors repayments. This scheme, with a €10,000 ceiling for an individual loan, had 11 clients by end 2012 with loans advanced of €61,150.64

NTMABS met with three local authorities in 2009 with a view to establishing a local guarantee fund. Part of the background was that in 2008 Dublin City Council had ceased caravan loans. In 2010, a pilot loan guarantee scheme was set up by Dublin City Council, Exchange House being another partner in the project, open to any Travellers in the Dublin City Council area who is an official tenant of a halting site and prepared to save four to six months in a credit union. The city council committed €50,000 to the fund and in 2013, four clients were saving and one had an active loan. In another local authority, Wicklow County Council funded a loan guarantee fund instigated by MABS but managed by Arklow MABS from 2013. By October three people were saving.

NTMABS and the Parish of the Travelling People administer a small loan scheme, with four clients in 2013, part of a wider scheme of financial assistance provided by the parish for Travellers under extreme financial pressure.

NTMABS prompted the Mountjoy Prison Savings Scheme (2009), also called North Circular Road Savings Club, to be developed in cooperation with the prison and Phibsboro Credit Union (CU). The Financial Regulator reportedly prohibited prisoners joining the local credit union because, being incarcerated, they were without the common bond, so it had to be established as a separate entity. Two information sessions were held in the prison and when the scheme opened it was anticipated that take up would reach 15 prisoners. In the event, 27 enrolled by end 2009, 30 by end 2010 (€10,000 lodged by this stage, with a dividend for the club of €35.62 in the year) and 43 in 2011. The mid-term evaluation (2011) recommended the scheme be replicated in other prisons and that prisoners be permitted to open accounts within the credit unions.⁶⁵ In 2012, savings totaled €11,852.24, but subscribers had fallen to 32, reflecting a reduction in prisoner allowances from €2.35 to a 3-tiered rate of €2.20, €1.70 and 95c, with a further -15% reduction for cell charges. Evaluation rated the scheme highly for building up savings that would assist prisoners on their release and creating saving habits.⁶⁶ It was anticipated that other clubs might be established; and that consideration should be given to permit prisoners to join ordinary credit unions. Discussions on a scheme in Arbour Hill were held in 2013.

In an international venture, NTMABS opened discussion in 2011 with Entrepreneurs4change, a Los Angeles based organization, for a micro-enterprise support credit scheme called Lending4change, doing so in cooperation with Dublin Simon Community, the South Inner City Community Development Agency and South West Wexford Community Development Project, each contributing €3,000. A Lending4Change entrepreneur training programme was piloted in early 2012 with 20

⁶⁴ NTMABS: *Clann Credo loan guarantee scheme - progress report*. Dublin, author, 2012, 2013.

⁶⁵ NTMABS: *Report on the North Circular Road Savings Club*. Dublin, author, 2011.

⁶⁶ NTMABS: *Report on the North Circular Road Savings Club*. Dublin, author, 2013.

participants from four organizations.⁶⁷ This programme will not be repeated, as the seed or loan finance to follow the training did not become available. One participant, Margaret McDonagh, subsequently opened a dressmaking business in Dun Laoghaire, O'Brien's Fine Designs, but she obtained funding through the local enterprise board.

Finally, NTMABS currently administers a payment system for 28 clients who have availed of loans from their local credit unions (Wicklow, Arklow, Ballymun, and Clondalkin respectively) to buy a trailer. NTMABS has active case files of money deducted through the household budgeting scheme: 7 Clann Credo and one saving; one repaying a Dublin City Council loan and one saving; 3 paying back from the Parish of the Travelling people, 5 paying off non-guaranteed credit union loans and 9 saving.

Overall, NTMABS' work in this area paints a picture of considerable activity, being involved in six major schemes of alternative credit and a venture into micro-enterprise. Although these schemes have been evaluated, these evaluations are large narrative and do not judge the overall value of these projects, nor the possibility of their replication.

2.2.4! Information, research, policy and equality across all financial and related services

Here, several fields of work in the strategic plan, are, for convenience, grouped here together. They are divided into information and media (2.2.4.1) and representation, engagement, networking and policy (2.2.4.2).

2.2.4.1" Information and media

One of the principal sources of information on NTMABS and its work is the website, www.ntmabs.org, updated 2010 and currently in revision. The home page carries a brief outline *What is National Traveller MABS? Latest news*, as well invitations to subscribe to *National Traveller MABS News* as well as to read *Thairie Times* on line. The remainder of the website is divided into headings for education; local area development; policy and research; and 'about us'. Each of the main headings has subsections, the principal of which are:

Community Education - strategy, activities, education resources, managing your money, publications, other resources;

Local area development - strategy, current projects, publications, mapping exercise;

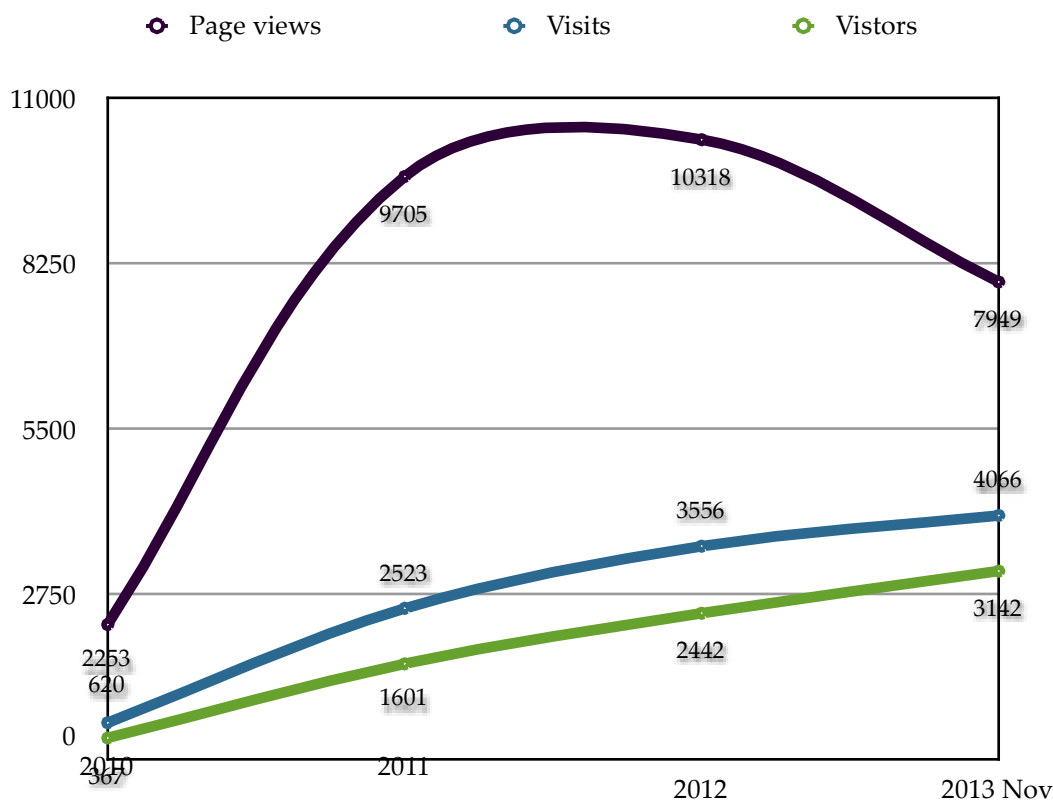
Equality - strategy, publication, Roma framework, Oireachtas review of Traveller ethnicity, financial exclusion of ethnic minorities;

Policy and research - strategy, current economic environment, financial inclusion, banking, publications, Traveller health strategy, social finance news;

About us - history of NTMABS, background, work practice, principles, vision and mission, board, staff, Traveller statistics, publications and papers. See Chart 2 for details of number visiting the website.

⁶⁷ NTMABS: *Report on the Lending4Change pilot entrepreneurs training programme*. Dublin, author, 2012.

Chart 2: Website use



This shows a steady growth of use of the website, with visitors rising from 367 in 2010 to 3142 in 2013; and visits rising from 620 to 4,066 in the same period. Page views are down slightly in 2013, but this is not an end of year figure and suggests that viewers are using pages in a more discriminating way (this is confirmed by analytics, which shows pages per visit down from 3.85 pages per visit in 2011 to 1.95 pages per visit in 2013). The weekly/monthly cycle of visits is quite consistent, with few spikes of interest.

The *Thairie Times* is one of the two regular information bulletins produced by NTMABS.⁶⁸ The *Thairie Times* was initially published quarterly from 2008, became biennial in 2011 and has now reached issue 15 (spring 2013). One copy is sent to each MABS while the online version is sent to the CIB and CIB partners. It generally carries about 4-5 stories: news about NTMABS (e.g. research in progress, courses completed) and about other important events in the Traveller community (e.g. *Traveller Pride* awards, closure of Traveller Training Centres, All Ireland Traveller Health Study, Traveller ethnicity campaign). The other newsletter is *National Traveller MABS News*, published bi-annually and for which there is a mailing list. The main target audience is Travellers, with a copy circulated to Traveller groups and organizations.

⁶⁸ Meaning 'Travellers talking' or 'Telling times'.

NTMABS publishes an annual report each year, with 2009, 2010, 2011 and 2012 to hand, generally in the order of 32 to 36 pages, with reports under the main headings of the strategic plan and an income/spending statement at the end. NTMABS issued a progress report to the CIB in 2010 and 2012.⁶⁹ NTMABS publishes general promotional materials, such as *Illegal moneylending*, *Illegal moneylending* (with Dublin City Council) and *NTMABS* (general information), 2011. A DVD on illegal moneylending was prepared; *A deal's a deal*, for which funding was received from the St Stephen's Green Trust and the National Consumer Agency (2012), the producer being Michael Collins of the Traveller Wagon Wheel Theatre Company. NTMABS has also contributed articles to a number of external media outlets (Table 2.4):

Table 2.4: External media contributions and outputs	
Year	Media contributions and outputs
2009	<i>Clare Traveller Focus</i> , ITM newsletter, Pavee Point newsletter, <i>News travels</i> (Exchange House), <i>Voice of the Traveller</i> (National Association of Traveller Education and Training Centres, each of four issues), <i>The Parish Newsletter</i> .
2010	<i>Voice of the Traveller</i> (regular column), <i>News travels</i> (Exchange House), <i>The advisor</i> (MABSndI)
2011	Prison officers newsletter, MABSndI website, ENAR magazine
2012	ITM e-zine, <i>Voice of the Traveller</i> , <i>The Parish</i> newsletter, <i>Southside People</i> , press release <i>A way of life</i> , 28th September 2012.
2013	MP4 of October 2013 conference (3:03). <i>Voice of the Traveller</i> (Pay as you go meters), ITM e-zine

NTMABS also achieved the following press and electronic coverage:

- *Presentation of MABS certificates*. [Limerick Weekly Observer](#), 17th March 2010.
- *National Traveller MABS launches Issues of personal finance in the Traveller Community*, [CIB website](#), July 2012.
- *Kitty Holland: Report on personal finances published*. [Irish Times](#), 5th July 2012.
- *Overcoming illegal debt - NTMABS launches education resource*. [CIB website](#), October 2013.
- Seminar on illegal moneylending (October 2013): DCTV, FM104 and Kildare FM.

It is possible that there are others, but this is the extent of what is readily available.

2.2.4.2" Representation, engagement, networking and policy

NTMABS engages with external agencies and presents a range of supporting products. NTMABS has achieved representation on the following bodies (Table 2.5):

⁶⁹ NTMABS: *Progress report, 2010, 2011, & 2012*. Dublin, author, 2011, 2012, 2013.

Table 2.5: Representation	
Current representation	MABS National Executive Committee Steering committee <i>Traveller Pride</i> week ITM accommodation working policy sub-group Exchange House Board, National Traveller Suicide Awareness Project LIR anti-racism training group Board, Social Policy Network Traveller ethnicity working group
Previous representation	MABS Technical Support Panel (this group no longer meets) MABSndI Publications Subcommittee (concluded) MABS client assessment model working group (concluded) Working group of Traveller organizations <i>Conflict within the Traveller community</i> (do.) ITM education working group (closed due to cutbacks) Traveller education strategy working group and consultative forum (withdrew) Board, National Traveller Women's Forum (withdrew) Board, Finglas for diversity (closed due to cutbacks) National Educational Welfare Board sub-group on Traveller education (withdrew) MABS accreditation working group (no longer functioning)

In its engagement with the political-administrative system, NTMABS met with the Department of Education and Skills in 2012 to discuss Traveller education; and the National Education and Welfare Board to discuss cuts, but a record is not available of the outcome. NTMABS had two meetings with the National Consumer Agency: This was to explore obtaining a grant rather than a policy matter and had a successful outcome in funding for *A deal's a deal*.⁷⁰ NTMABS engages in a substantial level of networking, which gives it access to statutory and voluntary organizations: see Table 2.6 for details.

⁷⁰ 23rd September 2010 and 31st July 2012, notes.

Table 2.6: Networking actions	
2009	<i>Yellow flag awards, Traveller Focus Week, Traveller Pride awards, Exchange House Educational Achievement Awards, Irish Traveller Movement (ITM) (stand at AGM, workshops, launch of feasibility study of Traveller-led Voluntary Accommodation Association), MABS (MABSndI information session, regional meetings, national workers day), Society of St Vincent de Paul report on poverty, Focus Ireland report Making a home in Ireland, International Human Rights Day, South Dublin Inter Agency meeting, Department of Social and Family Affairs conference Mainstreaming equality, UNESCO seminar Sustainability in community education</i>
2010	<i>MABS regional meetings, MABS/CIB conference, CIB conference; MABS national workers day; Irish launch 2010 European year for combatting poverty and social exclusion; Free Legal Advice Centres (FLAC) launch One size doesn't fit all - ten years of direct provision in Ireland; European Anti-Poverty Network (EPAN) Ireland Building social Europe - from crisis to opportunity; Irish Penal Reform Trust (IPRT) launch It's like stepping on a landmine - reintegration of prisoners in Ireland; Crosscare launch Let someone know youth worker training pack; European Network Against Racism (ENAR) Anti-racism monitoring forum; Equality Authority conference Mainstreaming equality, planning for equality; Department of Community, Rural & Gaeltacht Affairs Building a society for all social inclusion forum; Common cents (Clann Credo); Racism in Ireland (National Alliance against Racism); Using law to face current challenges (Public Interest Law Alliance (PILA)); Connecting communities, advancing integration (Integration Centre); Youth for the future (UNESCO); Mainstreaming equality (Equality Authority); National Adult Literacy Agency (NALA) Count me in - developing numeracy teaching and learning.</i>
2011	<i>ITM AGM, National Traveller Women's Forum (NTWF) AGM, Traveller drugs network meeting, Traveller Pride awards, Exchange House national Traveller services Education Achievement Awards, conference on Traveller mental health, International women's day (NTWF), conference Women in enterprise, Economic and Social Research Institute (ESRI) conference Financial exclusion and over-indebtedness, Bray social inclusion week, MABS regional meeting, Clann Credo Common cents conference, Aontas conference on community education, NALA conference on numeracy, launch of Universal Periodic Review, United Nations World Day for overcoming poverty.</i>
2012	<i>National Women's Council of Ireland Bearing the brunt; ENAR Diverse voices of women today, breaking the silence on racism; Irish Social Policy Association; ITM accommodation working group; ITM education working group; FLAC conference on personal insolvency legislation; European training on financial advice, Tallaght; European Consumer and Debt Network (ECDN) conference; Pavee Point seminar on habitual residence; meeting of Traveller organizations on ethnic identity.</i>
2013	<i>Social Inclusion Forum, ITM accommodation policy working group, National Traveller Women's Forum strategic plan, Traveller Pride planning committee, ITM working group on Traveller Community Organizations Charter, Social Policy Network, conference Child income support policy, MABS East, Intreo, MABS national workers day, MABS confidentiality briefing, Traveller Pride review, ECDN conference.</i>

NTMABS produces a range of policy-focused products, including submissions and research reports (Table 2. 7).

Table 2.7 NTMABS Policy Focused Products		
<i>Year</i>	<i>Submissions to...</i>	<i>Research</i>
2009	MABSndl: <i>Diversity awareness training</i> MABSndl: <i>Domestic violence training</i> Irish Hospice Foundation and Forum on End of Life: <i>Debt and dying</i> Financial regulator: <i>3rd money-laundering directive</i> Pavee Point: <i>Expenditure review committee</i> Irish Hospice Foundation seminar	
2010	Department of Finance: <i>Pre-budget submission, 2010</i> MABSIS Review Panel on need for ethnic identifier	
2011	Department of Finance: <i>Budget 2012</i> IBF submission on <i>Basic Payment Account, Final specification of the Basic Payment Account, Response to the strategy for financial inclusion final report</i>	
2012	Central Bank: <i>National Payments Plan</i> Department of Finance: <i>Pre-budget submission 2013</i>	<i>Issues of personal finance in the Traveller community, 2012.</i>
2013	Department of Finance: <i>Pre-budget submission 2014</i>	<i>Debt and dying, 2013</i>

Issues of personal finance was accompanied by an *Action plan*, which itemized the 27 recommendations and which member of staff was responsible for progressing each.⁷¹ It was launched by the Minister for Social Protection, Joan Burton TD.

Another substantial output was the 8th October 2013 conference on illegal moneylending, a high-profile and well-attended event, with prominent speakers (e.g. Sylva Langford, chair CIB; Aodhan O Riordain TD;). It was held because of local feedback which identified an increased rate of use of illegal moneylenders. Key stakeholders for the Traveller community attended (e.g. CIB, Gardai). Eleven participants returned evaluation forms, giving high ratings to all aspects of the conference (in the range 4.4 to 4.9 out of 5). The conference was commended for putting illegal moneylending back on the agenda, along with Traveller financial issues to the forefront. This was a substantial venture, budgeted at €3,785.

Other equality focused work undertaken by NTMABS includes:

- Training MABS staff in *Incitement to hatred* legislation
- Inputs to students in youth and community work, NUI Maynooth

⁷¹ NTMABS: *Issues of personal finance within the Traveller community, action plan 2012*. Dublin, author, 2012.

2.2.5! Organizational Development

NTMABS introduced a number of administrative and governance reforms in 2010, the principal elements of which were a template for reports on networking, project work, and policy work; monthly staff meetings; and individual staff presentations on work in progress to board. Templates have been put in place for post, annual leave and time off *in lieu*, costing projects, training and development. By way of governance codes, NTMABS has a short *Equality and diversity code of practice*. NTMABS has a procedure to respond to clients, be that clients contacting them directly, referrals through MABS or MABS asking for assistance.⁷²

NTMABS invests in staff support and continuing professional development and training. There is monthly to quarterly and biennial staff supervision with the coordinators, while coordinators are given support by the staff subcommittee of the board. Staff participate in the National Traveller Women's Forum peer support group. Staff are assisted in third level training, with two staff completing undergraduate studies 2009 and three then supported in third level studies. Staff participated in external training as follows:

External training

2010, MABS and the credit union; *Diversity awareness for service providers*; *Report writing* (MABS Training Unit); *Funerals, grief and dying in a multi-cultural context* (Irish Hospice Foundation); *Gender issues in a minority context* (NTWF); *Income maximization and social; Website development*.

2011, MABS disability awareness training.

2013, PMDS.

Board minutes for 2013 were seen by the evaluators. They are a concise record of discussion and decisions, with follow-up actions and those responsible clearly indicated. The coordinator makes a report to each board meeting, outlining progress under each of the strategic priorities, with statistics and details of networking activities.

2.3! Conclusions

NTMABS is, by national standards, a small voluntary organization, with an annual turnover of €325,000 and a staff complement of 4. At a time when most state funding for voluntary organizations has reduced sharply, NTMABS has been fortuitous in being part of an area where the state has been able to sustain a reasonable level of funding, namely MABS services. It has the standard range of organizational infrastructure: a board, with subcommittees; a legal existence as a company under the Companies Acts with articles of association and memorandum of agreement. Its activities are divided between community education; local development; alternative sources of credit; equality, policy and research; and organizational development. In the last case, there is an extensive range of outputs, focused on the website, newsletter, policy submissions and some substantial research publications. NTMABS appears to be well networked with other voluntary organizations and to have achieved a strong level of horizontal representation on advisory and working groups. All these areas will

⁷² NTMABS: *Client assessment policy*. Dublin, author, 2011.

be examined in more detail in the subsequent chapters. Table 2.8 summarizes the main inputs and outputs.

Table 2.8: Summary main inputs and outputs.	
Inputs	Human: 4 FTE staff; nine board members
	Financial: €325,000
Outputs -community education	<i>Way of life, The cost of moving</i> resources Extensive programme of training, presentations
Outputs - local area development	Local area development meetings Common bonds Outreach clinics Key worker programme
Outputs - alternative savings and credit options	Schemes with Clann Credo, Dublin City Council, Parish of the Travelling People, Mountjoy, <i>Entrepreneurs4change</i> .
Outputs - information, research, policy	Website Newsletter, <i>Thairie Times</i> Contributions to external media Representation Networking Policy engagement Policy submissions, research
Outputs - organizational development	Templates Continuing professional development

A substantial reservoir of skills and experience is in evidence in both staff and board. The activities described under both community education and local area development show that a considerable effort has gone into encouraging Travellers to use mainstream MABS services through intensive local efforts coupled with well-developed, practical educational resources. There is evidence of innovation, with the introduction of outreach clinics, the key worker pilot, common bond research and the *Lending4change* programme. Website visits have risen from 367 at the start to 4,066, with a continued upward trend. There is a significant media output in the form of newsletter, *Thairie Times*, annual report and external media contributions. At policy level, there is a suite of policy products, two important research reports (*Issues of personal finance, Debt and dying*), with a recent national conference to table issues of moneylending on the national agenda of financial exclusion.

3! Organizational analysis (objective 1)

The purpose of this chapter is to address relational issues and to make an analysis of the relationships between NTMABS and local MABS, MABSndI, the CIS & the CIB. First, the overall organizational environment is reviewed (3.1), before going on to look at the specific roles, functions and added value of NTMABS (3.2), the alignment and levels of engagement and collaboration between NTMABS and MABS, the CISs and MABSndI (3.3). This section also examines the overall NTMABS fit, both structurally and in the context of the NTMABS Memorandum and Articles of Association, with the roles, functions, statutory obligations and strategic needs of the CIB, as well as the extent to which there is a shared and consistent overall organizational view (3.4). Conclusions are identified in the final section (3.5).⁷³

3.1! Overall Organizational Structures

3.1.1 The CIB

The CIB was assigned responsibility for the Money Advice and Budgeting Service (MABS) in July 2009. The Board of the CIB, as a state agency, is appointed by the Minister for Social Protection and reports to the department. The CIB is also responsible for the 42 Citizens Information Services (CIS), which operate from 268 locations; the Citizens Information Phone Service (CIPS) and the Citizens Information website as well as the National Advocacy Service. The CIB operates using a regional structure as follows:

- Greater Dublin Area (plus Louth and Monaghan)
- Connacht (plus Cavan, Longford and Westmeath)
- Leinster (excluding Dublin, Louth, Longford and Westmeath)
- Munster.

⁷³ The relevant aspects of the terms of reference are to:

- Outline the role and functions of NTMABS and how these align with the roles and functions of CIB and its delivery partners, MABS and Community Information Services (CIS);
- Examine the added value that NTMABS brings to CIB as a unique agency with a clear focus on difference & diversity;
- Assess the contribution of NTMABS in building effective local networks between Travellers, MABS and other relevant service providers;
- Establish the level of engagement & collaboration with MABS & the CIS;
- Identify the extent of joint working / joint projects in common areas at organizational level and with CIB, MABS and MABSndI, the central support service;
- Establish the level of shared understanding of the statutory role and responsibilities of CIB with NTMABS;
- Establish the extent to which NTMABS' organizational structure is aligned with the strategic needs of CIB;
- Establish the extent to which a shared and consistent organizational view is understood & presented to third parties & the public e.g. in policy submissions, PR events etc. & make recommendations accordingly;
- Establish the appropriateness of NTMABS Memorandum and Articles of Association in the context of CIB's statutory obligations;
- Make recommendations to ensure better alignment of the roles, structure and functions of NTMABS with MABS, CIS and CIB and better co-ordination so that the needs of the Traveller community are best served while ensuring an efficient and effective use of public monies.

The CIB service delivery team supports individual services (CIS and MABS) within these regional areas, focusing mainly on service related matters, work planning and reporting, with support provided on a one-to-one basis as required. Each service is visited at least once a year minimum, normally in the January to April period, with an agenda centred on work planning, review and the completion of individual service work plans.

Less frequently, members of the regional teams, usually the manager, attends Board meetings or AGM meetings or in response to invitations to a discussion at a regular Board meeting. The CIB also provides a number of central supports such as human resources, finance, Information and Communications Technologies (ICT), information resources, advocacy, social policy and research, training and public relations. NTMABS links with some of these central services, but not with others: for example, NTMABS links with the public relations section when it has upcoming events, but rarely links with the training section.

3.1.2 The MABS Service and the CIB

The MABS service is made up of a network of 53 companies including 51 local companies and two national companies, NTMABS and MABSndI.

The organizational environment for the MABS service is somewhat unusual, as MABS services are delivered by independent and autonomous organisations, with independent boards and decision making structures operating at a local level, which are supported and funded by the CIB through a service level agreement. There are a number of structures that bring the MABS companies and the CIB together. See Table 3.1 for details of these structures for MABS.

MABS	<i>Directors and Members of the Management Board</i>	<i>Staff members</i>	<i>Joint Directors and Staff group</i>
	<i>National Management Forum (NMF)</i> A member of the management committee of each local MABS company participates in this structure. The group meets regionally. NMF is self-managing and self-organising. CIB provides a small amount of funding to support its activities.	<i>National Executive Committee (NEC)</i> This group meets regionally and involves MABS staff. This is self-managing group. <i>Technical Support Panel:</i> this group is contracted by MABSndI (and was originally set up by NSSB/ Comhairle) to support local MABS).	<i>The MABS Forum</i> This group is made up of four representatives nominated from the NMF and four representatives from the NEC. A staff and board member from MABSndI are also part of the structure. This group is convened by CIB and meets six times a year. It serves as a forum for exchange between MABS representative groups (MABS NMF and NEC) and CIB and MABSndI.
NTMABS engagement in these structures	NTMABS receives correspondence from the NMF but do not participate much but occasional meetings are attended from time to time by different board members.	A NTMABS staff member represents NTMABS at the NEC. It is seen by NTMABS as useful networking opportunity with local MABS. NTMABS is a member of the NTMABS Technical Support Panel	NTMABS is not part of this structure.

These types of structural arrangements demonstrate the evolved nature of the MABS service, but they also have a number of disadvantages. The inherited structure lacks an overarching dedicated MABS board that could have brought about organizational or policy cohesion across MABS and made possible the development of more effective information-collection systems (e.g. ethnic identifier and open debate on organizational relationships).

It could be argued that the establishment of MABSndI fulfilled some of these roles but certainly was not positioned to fill all of them. Consequently, the CIB has a challenging role as the Board with statutory responsibility for MABS in supervising a decentralized network

3.1.3 The CISs and CIB

See Table 3.2 for details of the structures that bring the CISs and the CIB together.

<i>CISs</i>	<i>Board Members, Staff and Volunteers</i>	<i>Chairs of the CISs</i>	<i>CISs Development Managers</i>
	The National Association of Citizens Information Services, NACIS, is the representative body for local and regional information providers within Citizens Information Services. It was established with the support of the CIB which provides core funding. NACIS and the CIB Board meet four times a year to discuss matters of common interest.	Meetings of the Chairs and the CIB are held twice annually at regional level. From October 2013, these meetings are now joint meetings with Chairs of MABS in the respective regions.	There are three meetings annually with the CIB and the 42 CISs Development Managers on a regional basis.

This complex, extended architecture is not an easy one to engage with. NTMABS is not connected to any of these CIS structures (3.2). Both the National Executive Committee (NEC) and the now joint meetings of the Chairs of the CICs and local MABS companies offer opportunities for NTMABS to make greater connections to both and it would also be useful for NTMABS to seek at least observer status at the MABS Forum. The CIB does not publish an organogram of this architecture⁷⁴ but it would be helpful if it were to do so and in such a way as to recognise the role of NTMABS.

3.2! Specific roles, functions and added value of NTMABS

The role of NTMABS was outlined in chapter 1 and its activities described in chapter 2. In the CIB and MABS architecture, NTMABS (and also MABSndI) may be seen as outliers, for neither is designed to provide services directly to clients. NTMABS is the only service that focuses on the needs of a particular group. There is nothing new about the concept of specialized agencies of this kind - they were elaborated in the flagship Community Development Programme.⁷⁵ One on its own, though, is unusual. Several experts commented that it was 'an anomaly', 'an odd fit' and that it stood out as 'different' at MABS events. One informant commented that 'NTMABS tends to talk about "financial exclusion and its prevention"', whereas other (MABS) speak of "money management", another that 'it works pro-actively, conducting outreach work, while the majority of MABS services do not operate this way'.

⁷⁴ E.g. CIB: *Annual review, 2012-3*. Dublin, author.

⁷⁵ DESSA (Disability Equality Specialist Support Agency), Blue Drum (arts), Pavee Point (Travellers), with regional support agencies such as Triskele, Framework, West Training.

This question of whether it matters that a specialized outlier sits within a structure so focused on generic services was explored with evaluation consultees. Their view, with which we concur, is that anomalous structures should not present a problem provided there is a collaborative manner of working across the various organizational structures and, most importantly, a quality service is delivered. NTMABS appears, as seen in chapter 2, to be well networked to other Traveller organizations and service providers and is, where they are open and willing, supporting these services and organizations to link with their local MABS and to a significantly lesser extent CISs. Chapter 2 showed impressive efforts made by NTMABS to encourage Travellers into mainstream services and where they were unsuccessful; this was due to lack of cooperation by local service providers (e.g. outreach proposals, common bonds). It seems that the outlier position or NTMABS in the architecture is organizational, rather than functional and not one of its own making. Quite a number perceived the present NTMABS position as one that made it isolated and 'vulnerable to rationalization'. One commented that 'it shouldn't be obliged to always have to make a case for itself. People forget that when NTMABS was set up, the other Traveller organizations got fewer and fewer and calls on financial issues, because they all went there after that' and this is a gain that should not be overlooked.

3.3 Alignment and levels of engagement between NTMABS, MABS the CISs and MABSndI⁷⁶ !

3.3.1! Alignment and levels of engagement between NTMABS and local MABS

Over the period 2006- 2010 NTMABS was in contact with the majority of local MABS companies as part of its local area development work, with meetings attended by almost all the local MABS companies.⁷⁷ Members of the NTMABS team estimated that they have excellent working relationships with about 20% of local MABS, the majority in the greater Dublin area. MABS receive the *Tharie Times*. Its purpose is to inform MABS and all CIB services about the work of NTMABS and issues pertaining to achievements within the Traveller community. *Tharie Times* was described as 'colorful, informative', 'some good stuff there'. About 47% of the local MABS companies (over the period 2010 and 2013) also had some involvement in the NTMABS community education programmes, while a smaller group within this cohort was also involved in specific NTMABS local area development and pilot work. One particular MABS

⁷⁶ MABSndI is currently responsible for the development of projects to support good practice in money advice in a wide range of areas, including, but not limited to quality assurance, social policy, money management Education, IT, web, training, publications etc.

⁷⁷ These meetings were organized over 2006-2010 by NTMABS, with invitations sent to local services working directly with the Traveller community in an area. The Citizens Information Centres were invited to attend at a late stage in this process. The main aim of these meetings was to bring local service providers together to: a) build links with Travellers and local services; b) create or reignite working relationships locally; c) find out what were the financial issues for Travellers; d) examine ways that local services could work locally together to address financial issues concerning Travellers; e) raise awareness of the service offered by NTMABS to support Travellers and MABS and other service providers to address the issue of financial exclusion within the Traveller community. 2011 saw the findings of all the meetings compiled together and the final report *Issues of personal finance within the Traveller Community* (2012).

enthused about its work and argued that it should get out and about more, make itself better known, run a 'this is what we do' roadshow, contact local MABS much more frequently by e-mail and phone to remind them that 'we're here'. The NTMABS community education programmes involve the local MABS companies in the implementation of the community education schemes with either local Traveller groups or members of the Local Traveller Primary Health Care Project team. See Table 3.3 for details of the NTMABS community education engagement with local MABS.

Table 3.3 Local MABS and their engagement with various NTMABS Community Education Programmes and Schemes (2010-2013)		
<i>MABS Location</i>	<i>Involved in/conducted community education with local Traveller group</i>	<i>Involved in/conducted community education with local Traveller primary health care project</i>
1. Arklow		1
1. Ballymun	1	
1. Bray	1	
1. Charleville	1 (specifically Train the Trainer training)	
1. Clare	1 (specifically Train the Trainer training)	
1. Clondalkin	1	
1. Cork		1
1. North Cork	1 (specifically Train the Trainer training)	
1. West Cork		1
1. Dublin 10 & 20	1	
1. Dublin North East	1	
1. Fingal		1
1. Finglas/Cabra	1	
1. Galway North	1	
1. Galway South		1
1. Blanchardstown	1	
1. Kildare		1
1. Limerick		1
1. Meath		1
1. Mullingar		Scheduled for Jan 2014
1. Tipperary North	1 (specifically Train the Trainer training)	
1. Tipperary South	1 (specifically Train the Trainer training)	
1. Waterford		1
1. Wexford		1
Totals	13	10

Survey feedback indicates that Travellers now do use local MABS services more, they are more visible and Travellers have more confidence in them. A small number of local MABS are also involved in the various loan schemes developed by NTMABS (see below). Some MABS are also involved in other NTMABS initiatives, which have already been outlined in more detail in chapter 2, such as:

- The loan scheme with Arklow MABS;
- The Prison Savings Scheme which involved Dublin North City MABS;
- The Pilot Outreach Clinic in Dun Laoghaire MABS and Southside Traveller Acton Group which ran on a monthly basis from February 2009 for over a year.⁷⁸ This concept was later replicated with Bray MABS, which ran from April 2011 to December 2011 and was evaluated in 2012.⁷⁹ The evaluators concluded that there was now an excellent network of services in Wicklow that actively engage with one another and referred Traveller to the appropriate series: there was no longer a need for an outreach clinic in the area. The learning arising from this pilot would have benefited from being shared more widely within the wider MABS network.
- The project to extend the credit union common bond with Dublin 10/20 MABS;
- The Key Worker Project, which involved facilitating engagement between Traveller Outreach workers and local MABS and CISs in Balbriggan, Wicklow, Sligo and Cork.
- The 2013 *Illegal Moneylending* seminar which involved Sligo MABS.

The NTMABS way of working is to engage with local MABS to encourage and support them to enable Travellers access their services and supports as clients, with which some MABS companies engage but which others may ignore. NTMABS cannot oblige them, a problem identified as far back as the 2009 NTMABS Annual Report which said:

.....with added pressures (caused by the recession) on local offices, NTMABS has witnessed a steep decline in the number of MABS services able or willing to allocate time to debt prevention through education (Annual report, 2009, p12).

This problem has become more acute since then, particularly with the passing of the 2012 Personal Insolvency Act and the identification of a role for trained MABS money advisors as approved intermediaries capable of completing a Debt Relief Notices for individuals who find themselves unable to pay their debts. Local MABS are already under serious pressure, with waiting lists as high as 20 weeks.⁸⁰ It is also the case that a number of local MABS services have acknowledged that they do not currently have the resources to engage in community education work with Travellers: one even turned down a community education course with NTMABS because it could not commit any resources thereto.

⁷⁸ It was discontinued because of staff shortages within the local MABS company.

⁷⁹ It was discontinued because the organisers (the local MABS, CIS and local traveller group) concluded 'that the clinic had been a success as there was now a strong local network and referrals were being made directly to MABS r the CIS if and where needed' (NTMABS (2013) MABS/CIS Outreach Clinic Report (p.5)

⁸⁰ MABS: *Client waiting times and numbers 30th June 2013*, from www.mabs.ie accessed 27th September 2013.

In continuing to run a community education programme, NTMABS is one of the few within the MABS network. One of its biggest challenges over the next number of years will be to continue to persuade overstretched local MABS to engage in NTMABS activities and programmes.

3.3.2! Alignment and levels of engagement between NTMABS and the CISs

NTMABS contact with local CISs is limited. The CISs should receive the NTMABS *Thairie Times* but it is not always clear that all CISs receive it, suggesting that the distribution routes may need to be revised. Meetings were held with a small number of other CIC Development Managers but to date nothing has come of these meetings. Three CIS (Balbriggan, Wicklow and Sligo) were involved in the Key Worker Project, while Wicklow CIS was also involved in the MABS outreach clinic and mobile bus project. Outside Dublin, in what is arguably a good practice model, one CIS works in a catchment area which has a significant number of Traveller families and has built a relationship with the Traveller community. Local Traveller organizations hold regular clinics in its offices and at one stage Travellers worked in the service. It does meet with clients presenting with financial needs, which are referred to local MABS.

3.3.3 Alignment and levels of engagement between NTMABS, and MABSndI

There is limited engagement between NTMABS and MABSndI, despite the fact that both have national policy development, research and training functions. NTMABS staff have attended some MABSndI training events (e.g. diversity awareness training, 2012) and in 2010 NTMABS submitted an article on its work for publication in the MABSndI *Advisor* newsletter. There have also been some specific linkages between NTMABS and MABSndI for a small number of specific pieces of work, for example the development of *Our Garaid*, its subsequent review with the help of MABSndI and its redevelopment as *A way of life*. Otherwise there is very limited communication between them either on practical or policy issues. It appears that in the past relations were closer. There was a representative of MABSndI on the NTMABS board, but when his term concluded, it was not renewed. There were regular meetings between the managers of the two organizations, but the last of these meetings took place in 2010.⁸¹

There appears to be some overlap between the two organizations, insofar as MABSndI carries out generic development work and provides training for local MABS and their money advisors, while NTMABS independently carries out specialized, Traveller-focused development work independently with local MABS. There would be merit in the two organizations enhancing their communications with one another at the very minimum to ensure that they are neither overloading nor overlooking particular local MABS companies. A more formal arrangement would be to have a mutual place on one another's boards, but the relationship between the two at present is not sufficiently cordial for this to have been discussed. Several acknowledged that 'the space between NTMABS and MABSndI is an awkward one' and there had been no effective relationship between them for some time. It is important that this now be reconstructed.

⁸¹ NTMABS: *Progress Report 2010*. Dublin, author, 2010.

In the course of our consultations, alternative structures floated by a number of consultees included the merger of NTMABS with the much larger MABSndI (30 staff), with two possible further options: (1) it could be a distinct division continuing its focus on Travellers or (2) its remit be expanded to focus on social inclusion more generally, with some consultees questioning whether Travellers merited a separate service. The majority of consultee preference was for NTMABS remain as a unique agency focused on the specific aspects of Traveller debt and money management. Several Traveller organizations feared that if integrated into MABSndI it would 'disappear there' and would be unlikely to retain or recruit Traveller staff. Such a fear is well founded, for recent 'integrations' in Ireland of smaller bodies into larger one have been unhappy for the smaller, with the permanent loss of skills, knowledge and voluntary effort.⁸²

3.4 Overall NTMABS fit with the statutory obligations, responsibilities and strategic needs of the CIB

While NTMABS works within the CIB structure, it would appear to be more peripheral than MABSndI, the only other MABS company with a national focus. There is, for example, no CIB representation on the NTMABS board. Although both the CIB and the Department of Social Protection are represented on a number of boards, the presence of funders on boards always create pressures and dynamics. This would require thorough discussion and an agreement, possibly a Memorandum of Understanding (MOU), to ensure its independence.

NTMABS policy positions fall within the general range of those presented by the CIB and MABS, but are prepared independently and are distinctive to the Traveller situation, with remedies calculated to address their needs. A comment made by a number of consultees on NTMABS' policy and research work was the extensive range of recommendations made by NTMABS, with the suggestion that NTMABS might be better, particularly in the current climate, to focus on the identification of a smaller number of priority recommendations. This prioritisation is currently underway as part of preparation of the new NTMABS strategic plan.

The NTMABS Memorandum and Articles of Association appear a reasonable reflection of NTMABS objectives and do not appear to be contrary to the CIB's statutory obligations. NTMABS staff and directors report good relationships with CIB staff (including the Regional Manager and the public relations staff in particular). There is a case for NTMABS, as one of only two national level MABS companies, to ask the CIB to raise its profile within the wider organisation.

Interestingly the principal issue identified by NTMABS in relation to its relationship with CIB was CIB reporting requirements, which are identical to those required of local MABS companies. They presented problems at two levels: first, they were found to be disproportionately time-consuming and second, non-financial reporting templates

⁸² *Who manages? Voluntary boards of management.* Irish Journal of Community Work, No 3, December 2012.

were devised for the other MABS which provide direct services to clients and do not adjust to the different role of NTMABS.

The various services supported by the CIB would currently appear to operate quite independently of one another, with only very limited connecting structures. This lack of connection between the various services stems from the fact that, up until four years ago when MABS came in under the umbrella of the CIB, services operated independently of one another, with their own overarching structures and supports. To that extent, NTMABS is no exception. The recent development, in October 2013, of facilitated joint biennial meetings between the chairs of the CISs and the MABS is a welcome positive development, while considerable scope for more of this type of cross-company interaction at both board and staff level.

3.5! Conclusions

The overall architecture in which NTMABS, MABS and the CIB operates is a complex one, which has an in-built tension between the organically-developed, decentralized nature of MABS (and CIS) and the centralized system of the department and the CIB, the sole funder, which is superimposed thereon. A deficit in the architecture is the lack of a debating space where those relationships may be openly discussed.

As one of only two specialized agencies working alongside a generic network, NTMABS appears to have an anomalous, even isolated position. There are convincing reasons, though, for a dedicated specialized agency to work for Travellers, both because of the particular and extreme situation of Travellers and because of the need for a culturally sensitive and appropriate service (chapter 1). The presence of a specialized service, whilst somewhat anomalous, is only an issue insofar as it jeopardizes the volume and quality of the service provided and if it is at odds with the rest of the MABS service and the objectives and role of the CIB. The record of NTMABS and its demonstrated commitment to mainstreaming Travellers into local MABS services (chapter 2), shows that this is not the case and that there is a high level of complementarity between the work of generic MABS providers at local level and the high-level support provided by NTMABS at national level. We did identify two problem areas, namely the lack of a relationship and limited cooperation between NTMABS and MABSndI; and the need for NTMABS to find better ways to feed the policy and practice-related learning from its work into the CIB, the CISs and MABSndI. It may be possible to achieve more architectural cohesion by the representation of the CIB on the board of NTMABS, but this would have to be done in such a way as not to compromise financial independence; and second, by MABSndI having a seat on the board of NTMABS and *vice versa*, a system of mutual recognition being important for an improvement in their working relationship. A presence on the MABS forum may be helpful.

A final observation is that although the terms of reference specified the relationships field as covering local MABS, MABSndI, the CISs and the CIB, two important relationships were missing, namely the local authorities (which are important for accommodation and finance-related issues) and the Irish League of Credit Unions.

4! Role and value of NTMABS to the Traveller Community (objective 2).

This chapter examines the role and value of NTMABS to the Traveller community under two main headings: first, whether its aims and outcomes reflect the needs of the Traveller community and its capacity to adapt to those changing needs (4.1); the engagement of Travellers with local MABS services (4.2); and the level of engagement and collaboration with other Traveller and related organizations (4.3). Conclusions are then drawn (4.4).⁸³

4.1! Aims, outcomes and adaptation to changing Traveller needs

In the view of consultees, NTMABS was and is seen as highly adaptable to the changing needs of the Traveller community. It is strongly connected through its community education strategy, one of only a very small number of MABS to have such a strategy.⁸⁴ Connections have been strengthened by the development of consultative fora and through the key worker and the outreach clinics.

Consultative fora were first proposed to the board in the paper *Consultative forums* (April 2011), which suggested the idea of roundtables for Travellers to debate issues of financial inclusion, make suggestions or raise issues. *Consultative groups: terms of reference* sets down their role, function and rules (e.g. confidentiality).⁸⁵ Four were set up in 2012: Meath (approx. membership 9), Balbriggan (approx. membership 5), Limerick West (approx. membership 6), and Wicklow (approx. membership 12). They are made up of Traveller Primary Health Care Workers. They meet approximately twice a year but have yet to meet as a collective because of issues related to travel. They have two key aims: 1) to inform and keep NTMABS up to date with issues affecting the Traveller community and 2) to facilitate constructive debate within the Traveller community on the work of NTMABS. Their overall purpose is to ensure that NTMABS reflects the needs of its target group. Topics discussed to date at the forums include funeral debt, the effectiveness of the *Way of life* money management module, community education, the report *Issues of personal finance within the Traveller community*, the development of a key or link worker, NTMABS promotional material and

⁸³ The relevant terms of reference are to:

- _Identify whether the aims and intended outcomes of NTMABS reflect the needs of the Traveller community;
- _Assess the capacity of NTMABS to adapt to the changing needs of the Traveller community in terms of the broader socio economic issues in Ireland;
- _Assess the contribution of NTMABS in the development, promotion and implementation of a community education programme for the Traveller community;
- _Establish the level of engagement and collaboration with other dedicated Traveller organizations and organizations who work with the Traveller community.

⁸⁴ *Strategic plan 2010-2012*.

⁸⁵ NTMABS: *Consultative groups: terms of reference*. Dublin, author, undated.

newsletter, working with young Travellers and a MABS clinic, all providing NTMABS with useful practical advice.⁸⁶

Another useful test of the responsiveness of NTMABS to the Traveller community is its community education programmes and their impact at local level: Traveller groups point to gains in money management; greater preparedness to go to MABS to get budgeting advice; less borrowing overall; where there is borrowing, keeping it 'in family', not going to money-lenders; and more savings in the credit unions.

Participants in its community education work spoke of how it was 'good at telling people what they could afford, where they could get loans, how to make money go further and how to save (e.g. stop smoking)'. This was one example of the budgeting process at work, one which is also instructive of modern life on low incomes:

We use the budget books. As parents, we teach the children how to budget from an early age, so that the welfare doesn't run out after only four days and they are left for three days with nothing. They learn how to use pre-pay meters, spending €10 to €15 a week, €20 if there is a lot of washing. They learn to make basic food the absolute priority and identify those things which have to go: magazines, six-packs, sweets, take-aways and Sky. No fancy food. No cigarettes at €9 a packet. They learn to 'watch the prices' and what's up or down in the local multiples and shop around. This is working and there is less borrowing now.

Local MABS were good at telling us what we could afford, how to stretch our money, whether we could get a loan or not. People learned to put money into a post office account or to put the children's allowance into the credit union as savings.

Its community education work was highly valued: 'when NTMABS staff come here, they are relaxed, friendly, ordinary, with a good manner. They drop everything for us to come out and help'. NTMABS was perceived to work hard to persuade people to engage with MABS services and credit unions, even if there had been difficult local histories in the past. It had been 'very active' in doing this through the local primary health care projects. Survey returns regarded NTMABS as friendly, personable, hard-working and professional.

Other Traveller organizations have a clear impression of the adaptation of NTMABS to the changing needs of the Traveller community. It is rated highly. Those who knew it from the start state that 'it has come a long way'. Those who were familiar with NTMABS in its early years regard it as having become very professional. Both the board and staff of NTMABS were seen by consultees to be competent and professional. Several identified the staff as its greatest strength. They were seen as 'professionally switched on'. The *Way of Life* community education programme was especially commended. NTMABS' role was valued for having put on the agenda of the Travelling community itself issues which had hitherto not been openly discussed (e.g. the cost of funerals, illegal moneylending). A point which settled people may miss is that, for Travellers, having a dedicated service in the form of NTMABS is a welcome form of recognition, status and acknowledgement. NTMABS was seen as valuable as

⁸⁶ NTMABS: *Report on the evaluation of 'A way of Life' Money Management Resources by the Consultative Forum of NTMABS*. Dublin, author, 2012.

a champion for the Traveller community, when it had so very few. Having a Traveller leader was especially valued. As one organization put it, 'recognition *is* important'.

4.2! Engagement of Travellers with local MABS services

A key test for NTMABS is the degree to which its support indirectly enables more Travellers to engage with local MABS services. Chapter 2 identified the significant efforts made by NTMABS to engage with local MABS services through the community education and local area development strands of its work. The number of Travellers using MABS services is difficult to identify, the principal reason being the absence of an ethnic identifier of clients within MABS and indeed within the wider CIB. As a result, the number of Travellers using MABS and indeed other CIB supported services remains unknown. It is the view of NTMABS that, 'it is vital for MABS to introduce a system of recording its ethnic client base'.⁸⁷ and NTMABS is currently working on making a formal submission on the subject to the CIB.

Where local MABS services were able to identify Travellers, it was because Travellers so informed them; from their names (e.g. well-known Traveller surnames); from their address (e.g. halting sites) or through mention by the local authority housing officer; or by their manner or appearance (e.g. speech, dress). The experience of local MABS of Traveller use of their service varied, from high to low. At the high end, one service with a high proportion of Travellers locally and adjacent to a Traveller centre reported high Traveller use, between 15% and 20% of clients. Others reported that Traveller clients were 'low' in numbers, another a consistent 5 to 10 Traveller users a year. It was the view of one local Traveller organization that *'without the intervention of NTMABS the local MABS would not have become tuned into the needs of Travellers. Now local Travellers state that the local MABS is someplace that they can go and know that they can get relevant help'*.

Observers familiar with NTMABS estimated that 10 to 12 (20 to 24%) of the 51 local MABS services had a 'significant' Traveller clientele, especially when there are halting sites in the vicinity. It is also the case that each MABS is expected to identify target or at risk groups in its area, where Travellers may be expected to feature distinctly, but we do not have information as to whether this has been done, collated or analyzed. The disappointing outcome to the NTMABS request for cooperation with ten local MABS outreach clinics (three said no, six failed to acknowledge) suggests that some local MABS are either overburdened or uninterested to assist.⁸⁸ As a result, NTMABS decided not to develop outreach clinics further until such time as local services were able to commit.

To return to the issue of the ethnic identifier, the general reluctance by local services to use an ethnic identifier is explained by a concern among the majority of service providers that, however innocently presented, an identifier would be regarded as an

⁸⁷ It is the view of NTMABS that, 'it is vital for MABS to introduce a system of recording its ethnic client base' (*Annual report*, 2010, p22).

⁸⁸ NTMABS: *MABS/CIS outreach clinic report*. Dublin, author, 2013.

intrusion. It would create distrust, local services stressing that 'we reach out to everyone, without distinction or discrimination, in a non-judgmental way and that would be undermined by an identifier'. There is an insistence that that 'we don't treat Travellers any differently', but in places there was an acknowledgment that this information might be useful 'at a corporate level'.

One MABS which strongly favoured the introduction of an ethnic identifier believed that it could be done without causing a problem. It was nonsense, it said, to have a specialized Traveller service like NTMABS but to not collect information on how many Travellers used MABS, whether the numbers were high or low. Similarly, this MABS reported on the nature of Traveller use of its service and the issues arising 'even though we were not asked to, but we should have been'. Several took the view that 'if ethnic identifiers can be used in Britain, they can be used here' and that there were ways of using ethnic identifiers sensitively and professionally. Another: 'It's done here already in the census, health, accommodation, education - so why not here?' Some of the Traveller representatives were impatient of local MABS services, saying that they were 'blind' or 'ambivalent' about diversity. Some Traveller organizations were more sympathetic to the local MABS: 'some have been very honest about their lack of expertise about dealing with Travellers. And when they are under pressure, they would have to be very motivated to go out to visit Traveller sites'.

Organizations working with Travellers had a strong impression that some Travellers were reluctant to go to mainstream MABS services. Some Travellers did not like being given advice by 'settled people who did not understand our situation' (some explicitly said they would be more 'comfortable' with a Traveller-only service). They had a sense that, in some MABS services, people identified them as Travellers and did not respect them. One MABS service acknowledged this and noted how Travellers were 'not always forthcoming, holding back, reticent' because they did not trust them. One MABS told of how it did not really understand the Traveller situation and had great difficulty getting anyone from a disadvantaged community on its board, including Travellers. Overall, 'we know about who comes, but not about who do not come and why not'. One service made a distinction between Traveller reluctance to come for money advice and for other services: one MABS reported that it was once authorized to distribute Exceptional Needs Payments (ENPs) on behalf of the Community Welfare Officer: 'so many Travellers came we had to introduce a ticket management system'.

Where MABS services did have Travellers engaging with them, they recognized the debt problems of Travellers as 'the same or worse than other low income groups'. Travellers had distinct problems, such as being turned down for credit for not having a settled or permanent address, with halting site addresses deemed not acceptable. Illegal moneylending was quite evident. They were aware that Travellers faced much greater financial barriers than the rest of the community. They had particular problems of literacy, which could be a problem in understanding hire purchase agreements. Many lacked self-confidence and trust. Because of this, they felt that Travellers were financially so marginalized that there was a definite need for a specialized unit to support this work.

NTMABS was also used whenever there was a problem with local MABS services, for example when there were lengthy queues and queries were urgent. Some Travellers were not confident about getting local MABS to deal with complex questions but 'we can get NTMABS to ask the questions'. NTMABS had sorted out a number of repeat, sometimes complex welfare problems. NTMABS was a champion which could intervene for them when there was a problem and in an environment in which they felt disadvantaged, one exacerbated by continued high levels of discrimination and the cuts from which they had suffered since 2008:

More Travellers use credit unions - but the welcome depends on who is behind the counter on the day. As for local MABS, there don't seem to be any Travellers there, nor do they seem to be talking to Travellers. We can't just ring up a TD like other people do.

Interestingly there is no formal, structured system in place for the local MABS to feed back their learning back to NTMABS, although there may well be good information flow through informal contacts. MABS services interviewed during this evaluation gave the impression that this was the first time they had been asked about Traveller use of their services. There was no information about the degree to which money advisors understood the needs of Travellers, or not.

4.3! Engagement and collaboration with Travellers and others

NTMABS is known to be strongly connected to other Traveller organisations horizontally (> Tables 2.5, 2.6). NTMABS was well regarded by other Traveller organizations: it is consistently seen as approachable, 'very accommodating with enquiries'. Where NTMABS staff sit on committees, they are regarded as effective contributors, while both national and local Traveller organisations consider NTMABS to be excellent at communication with them (i.e. horizontal communication). Traveller organizations described NTMABS as 'closely linked', communicative, excellent at information flow and valuable contributors. The NTMABS biennial newsletter for Traveller and Traveller organizations was commented on favorably by Travellers who found it easy to read and liked to see pictures published of people they knew. This newsletter is different to the *Thairie Times* in that it is specifically targeted at the Traveller community and is designed to improve financial literacy and capability within the community and promote financial inclusion. It also seeks to inform the Traveller community of the work of NTMABS. As outlined in chapter 2, NTMABS also contributes articles relation to uses of personal finances in the Irish Traveller Movement E-zine, the *Voice of the Traveller*, The Parish of the Travelling People Newsletter and the *Southside People*. Traveller organizations were positive about NTMABS role but would like to see it making a greater policy impact. One national organization spoke of how 'it knew little about NTMABS. While this may be our fault, it should also make itself better known'.

One area where collaboration appears to be limited is at international level. NTMABS has attended two meetings of the European Consumer Debt Network (ECDN) and keeps in touch with the Committee on the Elimination of Racial Discrimination (CERD) through ITM and the European Anti-Poverty Network (EAPN). The European dimension of its work does not appear to be well developed and NTMABS does not seem to be formally

affiliated to any of the two European money advice networks, the (ECDN,⁸⁹ nor the European Financial Inclusion Network (EFIN)⁹⁰, European Micro-finance Network; nor any of the European Roma networks, such as the EU Roma Rights Centre.⁹¹ The mixture of European policy responses to debt are much broader and arguably more successful than those in Ireland, so their absence closes off a potentially important avenue of knowledge, sharing, ideas, policy development and inspiration.

4.4! Conclusions

In conclusion:

- NTMABS is considered to be highly adapted to the changing needs of the Traveller community. The recent establishment by NTMABS of a consultative forum made up of four regional fora and the key worker projects were positive developments, ensuring that NTMABS remains focused on the key debt and money management issues for Travellers. They are a very useful testing ground for its services and have been used pro-actively;
- Its community education programmes are well regarded and examples were given of their impact on less borrowing, savings and money management;
- NTMABS is well-regarded and praised for its staff and board;
- NTMABS is well regarded by Traveller organizations and considered well informed in relation to the issues facing Travellers. They regard NTMABS as outgoing, collaborative and horizontally well-networked. NTMABS is considered to make a strong contribution to the field and its newsletter is widely read and appreciated;
- In the critical area of Traveller use of local MABS services, which is the task of NTMABS to promote, outcomes would appear to vary, with knowledge inhibited by the continued absence of an ethnic identifier;
- Networking and affiliation at European level appears to be poorly developed.

The final conclusion is that for Travellers, having a specialized service in this area is valued not only for the practical work undertaken, which is rated highly, but as an important form of recognition and respect of the community as a whole, which should not be underestimated.

⁸⁹ NTMABS does receive updates from ECDN by email.

⁹⁰ NTMABS did apply for membership of the EFIN and were accepted but did not join as the annual membership fee of €250 was considered by NTMABS to be 'excessive'.

⁹¹ Ireland has no organizational members of ECDN; two members of EFIN (the Credit Union Development Association; the Centre for Cooperative Studies, University College Cork); one in the European Microfinance Network (Microfinance Ireland).

5! Piloting, social policy work (objective 3)

The purpose of this chapter is to make a critical examination of the piloting (5.1) and social policy (5.2) work of NTMABS before consideration of the issues of strategic casework (5.3), with conclusions drawn in the final section (5.4).⁹²

5.1! Piloting

NTMABS has an important role in piloting alternative schemes of credit. This is reviewed under the schemes themselves (5.1.1), other activities (5.1.2) and wider applicability (5.1.3).

5.1.1! The Schemes

One of the key roles identified in the NTMABS Strategic Plan (2010-12) was 'to promote the development and implementation of alternative legal and affordable savings and credit options'. It would however appear that NTMABS is involved not only in promotion, development and implementation, but that it is currently involved in the operation of and the proactive support of a number of schemes. The Local Development Worker estimates that this takes approximately 1-1.5 days a week of her time, while it also absorbs some time from the Administrative Officer role. This does not include the time taken to make representation to get the schemes established, nor the time involved in reporting and evaluating the schemes.

Prisons savings scheme 'The North Circular Road Savings Club' was initiated by NTMABS with Mountjoy Prison and supported by Dublin North City MABS in 2009 and enables prisoners in Mountjoy to save regularly with Phibsboro Credit Union (>2.1.3). The scheme has received a positive initial evaluation with a rate of uptake much higher than originally anticipated, 43 compared to 15.⁹³ The end-of-pilot evaluation found a lower membership, 31 reduced due to external factors, such as the reduction of the weekly 'gratuity paid to prisoners by the state' (p. 6) and the 'transfer and release of prisoners'⁹⁴. Research to provide evidence of the practical outcomes in the lived experiences of the participants would be useful. This scheme is not specifically focused on Travellers and it is not known how many, if any, are members from the Travelling community.⁹⁵ The absence of this information raises question as to why NTMABS is involved in the scheme. NTMABS would argue that having the scheme available to Travellers is

⁹² The relevant section from the terms of reference is to:

- Examine the value of the piloting and social policy work of NTMABS' work
 - Examine to what extent NT MABS has affected change through piloting alternative financing projects;
 - Develop social policy as related to financial and social inclusion issues

⁹³ NTMABS: *One Year Evaluation of the North Circular Road Savings Club*. Dublin, author, 2012.

⁹⁴ NTMABS: *Report on the 'North Circular Road Savings Club' - a savings initiative with Mountjoy Prison and Phibsboro Credit Union*. Dublin, author, 2013.

⁹⁵ Mountjoy Prison does not have an ethnic identifier in its system.

the success. The October 2013 coordinators report notes the interest of the prison system in rolling the scheme out nationally 'and we are following up on this', but such an intent falls short of a mainstreaming strategy.

Clann Credo loan guarantee scheme

Under this scheme Clann Credo guarantees up to 50% of the loan value of a credit union loan to purchase a trailer. NTMABS supports clients access loans under this scheme by preparing potential borrowers details, supporting local MABS, working with Clann Credo on establishing loan amount repayment, meeting with credit unions and managing household budget deductions in relation to the loans from the credit unions.⁹⁶

Pilot Dublin City Council Credit Union loan guarantee scheme

Dublin City guarantees a proportion of the loan value of a credit union loan to purchase a trailer in a scheme to any Traveller living in the Dublin City area who is an official tenant on a halting site. Here, NTMABS supports clients under this scheme in a similar way to the Clann Credo Scheme.

Co Wicklow loan guarantee scheme

Likewise, this scheme is open to any Traveller living in the Wicklow County Council (WCC) area who is an official tenant living on a halting site, with WCC guaranteeing a proportion of the loan value of a credit union loan to purchase a trailer. In this case the scheme is managed by Arklow MABS with support from NTMABS where necessary.

Parish of the Traveller People loan scheme

NTMABS support the Parish of the Travelling people to administer its small loan scheme aimed at people in crises, supporting clients to establish repayment schedules. Three Traveller Families availed of this scheme in 2012.

In total, NTMABS currently (October 2013) has 29 active case files, managing household budget payments for clients. The majority of files are for the repayment of loans or cases are linked to the repayment of loans (16, 55%), while 13 (45%) are related to an individual saving either towards the possibility of a credit union loan (4) or for something else (9, 31%). These loans were highly valued in the Traveller community and many of those consulted knew of Travellers who had availed of them at a time when such finance was difficult to get elsewhere. Questions do arise as to the Traveller use of the Mountjoy scheme; and as to whether the administration of such schemes is the best use of scarce staff resources in NTMABS.

5.1.2 ! Other Activities

Credit Union Common Bonds

This work involved an updating of the national mapping of the Traveller population and accommodation using 2006 Census figures in order to determine how many sites

⁹⁶ NTMABS: *Clann Credo Loan Guarantee Scheme – Progress Report from NTMABS*. Dublin, author, 2012.

fell within the common bond areas of the local credit unions and how many do not. By August 2012, 85% of Traveller accommodation sites identified by NTMABS had been confirmed within a common bond, with the remainder (36 sites) to be confirmed.⁹⁷ Where Traveller accommodation was found to fall outside any common bond, the plan was for NTMABS to work with others to get the site included, but progress in securing the inclusion of the remaining sites since then has not been formally reported.

Entrepreneurs4Change Social Finance Programme

In 2012 NTMABS became involved with Dublin Simon, the South West Inner City Development Network and the South West Wexford Community in piloting the *Entrepreneurs4Change* Social Finance Programme. The programme supports potential entrepreneurs from marginalized and disadvantaged backgrounds to achieve their goal of establishing a business. As part of this programme NTMABS supported a Traveller business women undertake training, develop her business plan, secure a business loan and premises and launch her business in 2012. As noted in chapter 2, micro-finance did not subsequently become available and the programme has since been discontinued, although it must have generated useful insights and learning. The extent to which NTMABS has shared the learning arising from this experience with the wider MABS network and with others however remains unclear.

5.1.3.1 Effectiveness and wider replicability

The overall effectiveness and wider replicability of these schemes is not known. Although individual and useful reports of individual schemes have been done, there has been no comprehensive evaluation of these schemes as a whole to assess outcomes, impacts or implications and assess their value. Given that pilot schemes are highly dependent on quality and well-disseminated evaluation, this absence is a significant gap. There is little written documentation or systems in place to promote the wider replication or up scaling of these schemes, raising questions as to role and strategic value of NTMABS engagement in these schemes. No long-term strategies appear to have been devised.

That is not to say that the schemes do not have a value, for clearly they do to the individuals involved, but it is to question the use of scarce NTMABS resources in schemes that support individuals rather than the Traveller community more generally. Although a view in NTMABS was 'all that we can do is demonstrate', this is under-ambitious. Quite a number of informants took the view that it would be more useful for NTMABS to take up the issue of the Traveller economy, because earning real money through enterprise was the best way to avoid or get out of debt. It could challenge those areas where government action had reduced the Traveller economy, such as restricting scrap collecting, market trading legislation and the control of horses Acts. This was 'the big picture' to be addressed at policy level: a national Traveller employment strategy, a national Traveller enterprise strategy.⁹⁸

⁹⁷ NTMABS: *Review of Credit Union Common Bonds and Traveller specific accommodation*. Dublin, author, 2013.

⁹⁸ Collins, M. B. and Crowley, N: *Recycling and the Traveller Economy*, in *Irish Travellers: new analysis and new initiatives*. Dublin: Pavee Point Publications, 1992.

5.2! Social policy role

As may be seen from chapter 2, NTMABS has invested time and energy in progressing its social policy work, evident through its submissions, reports and research (Table 2.7). NTMABS has cited, as progress toward financial inclusion, its contribution to:

- Statutory Instrument SI 411/2008 Credit institutions (financial support) scheme, Section 45 setting down a statutory obligation of corporate social responsibility (2008);
- The Consumer Protection Code for Licensed Moneylenders (2008);
- The Revised Anti-Money Laundering Guidance Notes (2010);
- The Financial Regulator's Consumer Protection Code (2012);
- The government *Strategy on financial inclusion* (2012), notably the acceptance of the concept of the Basic Payment Account.

Whilst these documents are important, we do not have a picture of their significance, nor the environment in which they work, the precise gains achieved, nor a picture of subsequent progress. NTMABS has presented a number of policy proposals: the style of submissions is measured, crisp, clear and to the point, but there is no assessment in the annual report or elsewhere of their impact. Public understanding of its work would also benefit from a regular environmental and situational analysis. It is also not clear how NTMABS policy work feeds into and links with the social policy work ongoing within the CIB and MABSndI. Whereas the CIB has an overall responsibility for the development of policy in all the areas affecting the CISs and MABS, the task here is to sketch out the distinctive role, route and pathway of such a specialized and focused organization as NTMABS. It is understood that there is a social policy group functioning between CIB and MABSndI which it would be appropriate for NTMABS to join.

A feature of the policy work of NTMABS is that although NTMABS appears to be well networked horizontally, it has little vertical representation. Horizontal networking extends from Traveller organizations to broader social policy groups, such as the Social Policy Network.⁹⁹ NTMABS assigns considerable importance to horizontal working, considering that this will add to the cultural competency of all Traveller organizations, identify allies, keep connections with the target group and promote leadership, believing that this should continue. The choice, though, is not between horizontal *or* vertical working, but the balance between them. At present, the effort is almost entirely on horizontal working to the exclusion of vertical relationships.

NTMABS has not been is not now represented on bodies taking key decisions on financial matters, such as the Steering Group for Financial Inclusion, the Steering Group on Financial Education, the National Payments Implementation Plan Advisory Group, the Cooney report nor the Keane report, nor is it represented on important bodies concerned with Traveller welfare such as the high-level group on Traveller issues; the National Traveller Monitoring Advisory Committee, the National Traveller Accommodation Consultative Committee, nor the Traveller education advisory

⁹⁹ The Irish Social Policy Network is a collaboration of social and voluntary organisations to share information and ideas in relation to social policy.

forum.¹⁰⁰ NTMABS expressed an interest in seeking a place on the second one listed, but it is not known if this was pursued.¹⁰¹ There does not appear to be a strategy for working with members of the Oireachtas. None of these bodies appears to be on a mailing list. It is not known if it has formally asked for representation on these bodies, but if it has and has been refused, it did not publicly contest or publicize any such rejections. Although NTMABS met the National Consumer Agency twice in 2010, this appears to have focused on applying for funding.

That is not to say that there have not been individual interventions, for there have, but they fall short of a strategic approach. One veteran recalled that NTMABS had met the Department of Finance when Brian Cowen was minister and also Minister Seamus Brennan, but these appear to be the last ministerial meetings recorded. NTMABS has written to the various Ministers for Social Protection requesting meetings and in 2013 the current minister Joan Burton launched the NTMABS *Issues of personal finance within the Traveller community*. NTMABS has met with a member of the Oireachtas finance committee (Aodhán Ó Riordain) and subsequently a formal request was made by him for the committee to prepare a submission on illegal moneylending. The hope is that if he is successful then NTMABS be invited to meet with the sub-committee.

Survey information was strongly supportive of a representational, advocacy and lobbying role for NTMABS. Some of our informants were positive about the policy work and how NTMABS was 'pushing the boat out'. Its research was universally seen as of high quality. Others described themselves as 'vaguely aware' of its policy work, but not competent to assess its impact. Several MABS said they were unaware of the impact of the policy work of NTMABS, 'but it has at least put it on the agenda. It's a long haul'. A more typical comment, though, was 'we don't see the policy impact. The voice of NTMABS is not heard enough. Its policy work still has a long way to go'. Another criticized it as 'weak on outcomes, not able to prove positive outcomes from its interventions'. Some described it as of good quality but too 'nice' and 'soft'. There was criticism of the limited nature of conference and seminar work, both useful for engaging with wider audiences.

The quality of communications to the immediate field around NTMABS was, as noted in chapter 4, commended, especially the newsletter. This did not hold up when it came to communications further afield and several analysts made a distinction between the two: 'NTMABS has no communications presence or media profile outside Traveller and voluntary sector outlets. You don't hear or see them interviewed on radio or television'. This was said by Travellers too and is confirmed by its limited media citations (2.2.4.1). Although NTMABS sought occasional media opportunities, there did not appear to be a media strategy or targets, nor a consciousness of a need for them, nor does there appear to be a media mailing list. There is a significant

¹⁰⁰ In the case of the Steering Group for Financial Inclusion, MABS was represented by MABSndI. Travellers were not specifically mentioned in its report, *Strategy for financial inclusion, final report*, which confirms the importance of NTMABS to have been represented there.

¹⁰¹ NTMABS: *Report from a meeting with the National Consumer Agency, 23rd September 2010*. Note. In the event, the steering group on financial education has met only once since 2006, but that of itself is remarkable.

specialized financial press, ranging from the financial pages of daily papers to *Central Bank Quarterly Bulletin*, which would enable NTMABS to reach out to financial decision-makers.

5.3! Casework

As mentioned earlier, the formal position is that NTMABS does not take casework: all client cases are expected to be resolved by appropriately equipped and trained generic MABS, a mainstreamed process, supported by the specialized service provided by NTMABS. In particular cases NTMABS has, in liaison with the ITM Legal Unit, encouraged individuals to make legal challenges when faced with financial exclusion. Interestingly no case has been progressed as the individuals involved decided for various reasons (including a lack of confidence) not to progress the case. In reality, NTMABS receives referral and queries on individual cases from a number of sources some of which are passed on to expert, contracted caseworkers.¹⁰² According to the 2012 NTMABS *Progress report*, it received 36 referrals from a range of sources that year, 15 of which related to difficulties accessing loans. See Table 5.1 for details of the sources of referrals and 5.2 for details of the location of the referrals.

<i>Source</i>	<i>No (% of total) of Referrals</i>
Traveller organisations	15 (42%)
Individual Travellers	10 (28%)
Local authority	4 (11%)
Other (Traveller family/friends)	2 (6%)
Community and voluntary sector/charitable organisation	2 (6%)
Local MABS	1 (2.33%)
Local CIS	1 (2.33%)
Public representative	1 (2.33%)
	36

<i>Location</i>	<i>No (% of total) of Referrals</i>
Dublin	18 (50%)
Counties surrounding Dublin (Wicklow (5), Meath (3), Louth (1))	9 (25%)
Rest of Leinster (Laois (1), Carlow (1))	2 (5.75%)
Ulster (Cavan (2))	2 (5.75%)
Connaught (Roscommon (1))	1 (2.75%)
Munster (Waterford (1))	1 (2.75%)
Unknown (3)	3 (8%)

¹⁰² NTMABS: *Annual report*, 2010. Dublin, author, 2011, p16.

Analysis of source and location suggests that the majority of the referrals come from Traveller organizations and individual Travellers largely based in locations in and around Dublin where NTMABS has long standing links, which is not surprising given its original origins as the Dublin located Exchange House MABS. See Table 5.3 for an analysis of the nature of the referrals received in 2012 and NTMABS response.

<i>Issue</i>	<i>No of these type of referrals</i>	<i>NTMABS response</i>
Credit to purchase trailer	11	Refer individual to credit union and various loan schemes (supported by NTMABS)
Social welfare issues	13	MABS, MABS technical support and CIS
Need for financial assistance	4	Refer to Parish of the Travelling Community for loan assistance (supported by NTMABS)
Legal debt	3	Refer to local MABS and debtors
Illegal money lending	3	MABS
Family support	1	Family Support Agency
Mortgage application	1	MABS

The coordinator's report (April 2013) reported 18 referrals in 2013Q1, most being then re-routed to local MABS and small loan schemes (e.g. for caravans). Details of referrals are now logged on excel files.¹⁰³ These details appear to be supplied in the progress reports, but not in the annual reports. A more strategic case reported in *Thairie Times* (No. 14) was that of a young Traveller couple refused rent supplement on the basis that they were on the reduced social welfare payment rate set for young jobseekers (€100). They appealed on the basis that early marriage was a feature of the Traveller community and they could not be expected to rear children on so little. NTMABS supported their appeal, which was successful.

When asked as part of this evaluation process why Traveller organizations and individual Travellers referred cases directly to NTMABS, the explanation was that Travellers were often reluctant to go or would not go to the local MABS for a variety of reasons, such as 'the local MABS would not understand their situation', 'the issue was particularly sensitive', 'the local MABS would not have the necessary knowledge to deal with the specifics for Travellers'. This is corroborated by external experts who commented that 'local MABS should take up such cases with Travellers, but in reality they probably can't or won't'. In the course of the evaluation, it became clear that there are local MABS that never refer Travellers to NTMABS (because they believe it does not do casework); those that make occasional referrals; those that check information with NTMABS but do not refer onward; and those that do refer complex cases to NTMABS to resolve (e.g. identity, addresses).

¹⁰³ NTMABS: *Client database, 2013*. Dublin, author, unpublished.

This situation raises the questions as to whether NTMABS should take on roles in:

1. Routine casework, recognizing that this could be geographically difficult for the minority of cases outside Dublin;
2. More complex cases;
3. Strategic casework.

NTMABS clearly does not have the resources to take on routine case work across the country and to do so would undermine the many years of work devoted to the mainstreaming process and is not appropriate. Without familiarity with individual circumstances it is not possible to know for certain, but it is possible that Table 5.3 includes some 'routine' cases which should not be considered and should be discouraged. On the other hand, there is a case for NTMABS to take on more complex cases beyond the competence of local MABS; and to take on strategic work that has the potential to test particular situations, like those cited above and to demonstrate good practice. The recent case of collective disconnection in Finglas (1.2) and high reconnection fees, has the potential for a challenge, for example through the Commission for Energy Regulation. Similarly, there is a note in NTMABS of a case in which a Traveller was refused credit union membership due to identity issues, even though he complied with the requirements asked of him.¹⁰⁴ NTMABS decided to seek legal advice from the Traveller Legal Unit, but the outcome is not known.¹⁰⁵ The case is in turn suggestive of a challenge through the Financial Services Ombudsman.

The thrust of this discussion is to suggest the appropriateness and value of NTMABS taking on both complex cases beyond the competence of local MABS; and of strategic casework which prompts systemic change in the way in which Travellers are treated within financial and related institutions in banking, debt and financial services. The argument for NTMABS to take on such casework becomes ever more important as the law on finance and debt repayment, with associated codes, becomes ever more complex. Ultimately strategic casework could take the form of judicial review, where some cases have already benefitted Travellers: *McCann* (which struck down automatic imprisonment for debt) and *Gabriel* (which struck down the requirement that hire purchase debtors always repay 50% of money owed). Both were taken by community-based law centres and they illustrate the potential of this approach.¹⁰⁶

For NTMABS, such an evolution would lie some stage in the future, but there is a strong case now for it to take on both complex and strategic cases, which could be pursued through the appropriate institutions which regulate financial institutions. This would require NTMABS to draw up criteria as to what is 'complex', what is 'strategic', whether and how merits tests should be applied; and inform MABS services and the Traveller community accordingly. One informant commented that 'local MABS would probably not appreciate the potential of strategic casework or the

¹⁰⁴ NTMABS: Unidentified note dated July 2011.

¹⁰⁵ The Traveller Legal Unit is a project of the Irish Traveller Movement. It employs a solicitor and has about ten cases in process at any one stage; but it has no particular expertise in financial exclusion: see www.itmtrav.ie.

¹⁰⁶ *McCann* was taken by the Northside Community Law Centre; *Gabriel* by the Free Legal Advice Centres. There is also a community-based law centre in Ballymun.

significance of individual cases coming in concerning Travellers', so some process of information-giving would be important. This would involve a certain but well manageable level of up skilling (e.g. how the Financial Services Ombudsman works).

Equipping NTMABS to take on complex case work would enable it to address the concern held by a number of external commentators that 'not actually meeting clients is definitely a weakness'. Another: 'client contact *is* important' and 'even a phone line for clients would be a start'. The ground truth issue is an important one. In 1.3, we were able to present the changing picture of Traveller indebtedness, but apart from the consultative forums there is no system in place where such information is currently fed directly to NTMABS. Once this is done, NTMABS would then be in a position to contribute its information and analysis onward to the CIB and its regular social policy reports.

Taking strategic casework has significance beyond the individual cases themselves: it would 'up the status of NTMABS and make it a serious player in the field of low income finance. The big institutions might treat it more seriously'. Gains for Travellers would benefit not only Travellers but would make all financial services culturally inclusive for all minorities. 'Maybe we could look forward to the day when banks underwent not only a financial 'stress test' but a 'culturally inclusive stress test'.

5.4! Conclusions

Our conclusions on the piloting and social policy role of NTMABS are as follows:

- NTMABS has developed a number of alternate finance pilot schemes. Although short evaluations of individual schemes are available, there has been no overall evaluation of this important pillar of the work of NTMABS. The lack of information about Traveller participation raises a serious question about the Mountjoy scheme. A first requirement for any pilots is early, substantial evaluation and dissemination, so this is a key gap;
- It appears that a significant amount of NTMABS time is devoted to the routine administration of these schemes. This is not the role of a specialized, policy-focused agency and its skilled staff: ways must be found to disentangle NTMABS from this activity;
- In the future for NTMABS to take on pilot work there must be a clear timeframe for the project (with a beginning, middle and end) and a plan for dissemination of the learning. NTMABS does not seem to have been able to date to upscale or mainstream its pilots;
- NTMABS has made a case that it has influenced a number of important policies, strategies, codes and statutory instruments, but precise information is not available on the nature of that influence, the current decision-making environment in these areas, nor the current state of play on these issues;
- Although NTMABS is horizontally well-networked, it does not appear to have made any important vertical linkages and it is not known if they were even requested. Engagement with state authorities and agencies concerned with financial exclusion appears to be limited. There do not appear to be mailing lists to form the basis for such an engagement;

- Although NTMABS has good communications through the MABS, Traveller and immediate voluntary sector field, they appear to be weak further afield, with no evidence of a significant presence either in the mainstream media or the specialized financial press;
- Although the official position is that NTMABS does not undertake casework, records show that it received 36 referrals in 2012. Granted the substantial and impressive efforts made by MABS to mainstream Travellers into MABS, it should avoid accepting 'routine' casework.
- There are convincing reasons for NTMABS to take on both complex cases beyond the capacity of local MABS and strategic casework that presents opportunities to promote systemic change in the area of financial inclusion for Travellers and related groups. This would have the added advantage of providing ground truth and enabling NTMABS to build closer policy-related links with the CIB and MABSndI.
- Overall, this chapter suggests that NTMABS should re-design its piloting work; withdraw from low-level administration of loan schemes; develop a strategy for appropriate high-level engagement with the political administrative system; and develop a casework role for complex cases beyond the competence of local MABS and strategic casework for systemic change.

6! Effectiveness and efficiency (objective 4)

This section assesses the use of resources by NTMABS specifically in relation to its metrics (6.2); media work (6.3) and the human resources of the board (6.4). Conclusions are drawn (6.5).¹⁰⁷

First, to make some overall judgements on effectiveness and efficiency, the outline of outputs and activities in chapter 2 suggests that NTMABS carries out a substantial body of work for an organization with a limited budget (€325,000) and small staff complement (4 FTE). Informants were impressed with the volume of work undertaken and its quality: several commented that NTMABS appeared to be 'over-stretched', 'spread too thinly', 'under-resourced, like everyone else', that it had 'definitely taken on too much'. These comments suggest not only a high output level but that there may be a need for prioritization of the key issues.

6.1! Metrics, protocols and documentation

Some metrics, protocols and documentation in NTMABS appear to be weakly developed. We lack detailed information on:

- Community education events and training provided;
- National and local development-related events;
- Publication print runs (reports, research, newsletters);
- Mailing lists (apart from two for the newsletter);
- Meetings with state agencies (e.g. Department of Education & Skills, 2012);
- Volunteer time.

To take one example, in the case of Table 2.2, information was assembled from a variety of sources and whilst it paints a picture of the activity under way, there is no single universal record of dates, the precise activity undertaken, the presentations themselves (e.g. powerpoints), nor details of participants and evaluations.

Like other MABS, NTMABS does publish an annual report, which includes outline information on its activities. It is descriptive and narrative, rather than analytical or reflective, which may mean that an opportunity to use it as an effective campaigning document is foregone. It lacks a situational analysis, reflective role or policy focus. There are many ways of using annual reports creatively and as a formidable instrument for policy engagement.¹⁰⁸

¹⁰⁷ The relevant section of the terms of reference is to:
Identify and assess the effectiveness and efficiency of NTMABS in relation to:
_Use of resources;
_Boundaries and possible overlaps and duplication of work with other organizations, ensuring clarity between them.

¹⁰⁸ Burnett, Ken: *Charity annual reports - a complete guide to planning and production*. London, Directory of Social Changes, 1987.

6.2! Media: website

Chapter 5 was critical of the external media footprint and here the website is examined, a key instrument of communication. It has a clean presentation, the stories neatly presented and well written. The site, though, is uneven. Some of the material on it is quite dated (e.g. *Report on money management workshops*, 2006) while the connection of other material to NTMABS, whilst worthy, is quite tenuous (Dale farm evictions, UK fuel poverty review), while it relays many stories from other Traveller organizations (e.g. *ITM seeks recognition of Traveller ethnicity*). Although NTMABS material is there,¹⁰⁹ it can often be mixed in incongruously with material from external agencies (e.g. *Ubuntu* guide to development education). Key educational resources, e.g. *Way of life*, do not appear to be prominently available. Few government-related documents on financial inclusion appear to be available. There are important gaps, such as a lack of information on staff and board and their qualifications. Articles and press coverage do not appear to be posted. There is no search mechanism, nor RSS feeds. The national newsletter can be requested from the site, but does not appear to be available there. In the course of the evaluation, it was necessary to request a broad range of documents, which were willingly provided, but many of them could have been placed on the site in the first place (e.g. progress reports).

In summary, the website, which is an important investment of time, could be more effectively focused on a narrower range of more carefully chosen, consistent items. It does not appear to have developed a Facebook or Twitter presence, which are now standard tools for voluntary and community organizations. The site should be a top 'go to' resource for researchers, journalists and activists, showcasing the full range of NTMABS activities, but at this stage requires a makeover. A more affirmative media role should be coordinated with the CIB so as to ensure consistent messaging by all parties. A modest amount of training in the development of social media may be required, but these courses are now readily available (e.g. The Wheel).

6.3! Human resources: board

External comments on the current members of the board were positive, but qualified. Informant especially valued its role in supporting the staff, where it was considered effective and valued, but it did not pro-actively lead the field. One of the important features of a board is to provide a 'thinking' stimulus to an organizations: here, board members did not appear to have presented or published their own views on the future of money advice and budgeting services, or if they had, they had not been disseminated or posted on the website.

The board has been conscious of the need to increase its membership and this was discussed during 2013 board meetings. There may be scope for the addition of a number of new skills, especially in those areas where deficits had been identified in this report, such as media, metrics, engagement with public administration and

¹⁰⁹ *Debt and dying* (main text and executive summary); *Pre-budget submissions 2011, 2012, 2013, 2014*; *Submission to the Central Bank on the National Payments Plan*; *Response to the IBF submission*; *Response to the strategy for financial inclusion final report*; *An exploration of financial exclusion and access to affordable savings and credit - a case study of the Traveller community*, by Elizabeth Daly.

evaluation. Although board membership is determined by invitation, it may be possible to extend this process to public advertisement and application: there is already a national organization in existence to facilitate this, Boardmatch.¹¹⁰ A European comparison is also useful. One of the keys to the growth in effectiveness of Traveller equivalent organizations in the European Union had been the involvement of skilled, highly trained, professional young Roma. While they have benefitted from the leadership training course developed by the Open Society Institute which has not operated in Ireland, a search for and the addition of young Traveller leaders to the board could give it considerable fresh impetus.

A final comment is that although the website lists board members, it does not provide photographs or a description of their skills, interests or responsibilities, which may mean that the skill levels of the organization are inadequately appreciated by external observers.

6.4! Conclusions

Our conclusions are as follows:

- Although NTMABS has a high throughput of work and activity, several external observers commented that it appeared to be overstretched, suggesting the need for greater prioritisation and concentration of effort;
- The metrics, protocols and documentation of the organization present problems, with the range and depth of activities not fully recorded. The annual report is underused and could fill a strong reflective, promotional and advocacy purpose;
- The website requires more focus, dropping less relevant material and improving the range of more relevant material;
- There is a need to add skillsets to the board, especially strategic thinkers and experts in such areas as metrics, media, evaluation, engagement with public administration and dissemination. Their contributions should be published. There are possibilities for more open recruitment of board members and searching for the newer generation of Traveller leaders.

¹¹⁰ www.boardmatchireland.ie.

7! Issues, conclusions and recommendations

This section concentrates on the role, functions and structure of NTMABS, its appropriate alignment with CIB and its social inclusion remit. It contains some overall conclusions (7.1), followed by recommendations (7.2) before some final remarks (7.3).

7.1! Conclusions

NTMABS operates in a difficult economic and social environment in a country with one of the highest levels of personal indebtedness in the European Union. It is evident, from chapter 1, that the nature of debt differs between mainstream, low-income and the Traveller community, each having its own characteristics and solutions. Irish government approaches have concentrated on mainstream debt, with a more limited attention given to low-income debt.

NTMABS works in an unusual architecture, part of a decentralized network of 53 MABS organizations, functioning under a centralized structure under the Department of Social Protection and the Citizens Information Board, the sole funder. It is the only specialized organization within the network, which makes its position appear anomalous and may be why it is frequently treated more like a local than a national MABS within the context of CIB.

NTMABS has a substantial range of outputs with a budget of €325,000, a small staff (4 FTE staff) and a skilled board drawn from a range of professions, occupations and disciplines. It has carried out a range of activities crossing its key current *Strategic plan 2010-2012* areas, notably community education, local development, alternative credit, policy and research and organizational development, which are substantial for an organization of such limited resources. In examining the architecture of the MABS network and CIB, NTMABS appears to be in an anomalous and isolated, even vulnerable, position as the only specialized agency of its kind among 51 generic services. The notion of a specialized service providing specialized support to generic services is not a new one in Irish social policy or public administration. Nor is it a problem, for it is apparent that NTMABS invests, through its community education programmes and local area development, substantial resources in encouraging the mainstream use, by Travellers, of local, generic MABS services. There is a complex, extended architecture of National Management Forum, National Executive Committee, MABS Forum, National Association of Citizen's Information Services, CIS chairs and CIS development managers, which is not well suited to an engagement by a specialized service like MABS. A general problem with the architecture is that it does not appear to provide a healthy, reflective space where organizational issues and options may be discussed in an open, clinical manner. A specific problem identified was the lack of a working relationship between NTMABS and MABSndI.

The current architecture is predicated on the notion that local MABS deal directly with Travellers, with local MABS informed and trained to do so by NTMABS (but do not provide a direct service). Here it is clear that local MABS had quite a range of

experiences of Travellers using their services, from little use to as many as 15% to 20% of users. Their distinctive needs are strongly suggestive of the need for a specialized support services like NTMABS. A core problem was the lack of an ethnic identifier, a proposal recommended for many years, but whose lack of implementation makes precise measurement impossible. NTMABS is well regarded and considered an outgoing, collaborative organization. NTMABS is not networked at European level, making it more difficult to widen the debate on financial exclusion (>1.1).

NTMABS has developed several schemes in the area of alternative credit. Although there are some short, individual evaluations, there has been no comprehensive examination of these pilots, nor dissemination of their outcomes. It does not seem that NTMABS has the resources to mainstream, replicate or upscale these pilots, nor does it have a design to do so, which creates the danger that they will remain stand-alone, largely Dublin focused projects rather than pilots capable of wider application in other locations. NTMABS have a largely administrative role in these schemes, which is probably not appropriate for a highly-skilled specialized agency of this kind.

In the area of policy work, NTMABS has published a range of succinct policy documents and has carried out quality research which has been commended. Whereas NTMABS is well represented horizontally, especially across the Traveller community, it does not appear to have vertical connections or engaged in a substantial way in the policy-making community. It has not achieved representation on those bodies concerned with advising government on financial inclusion, nor does it appear to have asked for such representation. External observers were critical of what they considered both its limited policy impact and national media footprint.

Although NTMABS does not formally deal directly with clients, in practice it does receive referrals. One of the questions we examined was whether NTMABS should accept routine casework, but to do so would cut across the successful mainstreaming approach developed by its community education and local development activities. Instead, there is a case for the expansion of NTMABS' role to take on casework for both complex cases beyond the capacity of local MABS services; and for strategic casework in the areas of debt, credit and the regulation of financial institutions. This would also have the double merit promoting systemic change for financial inclusion and in providing ground truth to inform its policy work.

Chapter 6 identified three areas of concern: the limited documentation of the organization, which means that many aspects of its work go unrecorded or unpublished; the insufficiently focussed nature of the website; and the need for a different balance of human resources on the board, bringing in skills in the area of strategic development, metrics, evaluation, public administration and dissemination, with the addition of a public recruitment pool and the newer, younger generation of Traveller leadership, turning it into a 'leading' board.

In summary, NTMABS is effective for its size, but the analysis here suggests the need to re-focus, re-prioritize and re-concentrate its scarce resources. Overall, our principal finding is that it can be more ambitious, reducing the time and energy spent on comparatively low-level tasks and functions and take on a more challenging, leading

role in engaging with the political-administrative system concerned with financial exclusion; develop strategic casework that will drive systemic change; build connections to European solutions to indebtedness; and increase its media footprint. These more ambitious tasks would be more appropriate to the high levels of skills and experience already present. At the risk of simplification, Table 7.1 summarizes the nature of that change:

Table 7.1: Re-orientation: principal elements			
<i>Stop</i>	<i>Less</i>	<i>More</i>	<i>Start</i>
Administration of loan schemes	Horizontal networking	Engagement with actors concerned with financial inclusion (departmental, agencies, Oireachtas)	Complex casework beyond competence of local MABS
Routine referrals	Engagement with local MABS as they seek to develop their roles as financial intermediaries	Metrics	Strategic casework, with development of criteria, information campaign to inform MABS
		National media	Engagement with redress institutions e.g. Financial Services Ombudsman.
		Dissemination strategies	Development of stronger links with CISs
		NTMABS activity posted on website	Structured engagement with CIB in relation to social policy and service delivery
		Connections to Europe	

7.2! Recommendations

7.2.1! NTMABS Overall Role & Purpose

The need for NTMABS as a specialized support agency for Travellers remains. It has achieved a substantial workflow with limited resources. By taking an even more strategic focus it could, with its existing financial resources and high level of human resources, carry out a more ambitious role in the area of financial exclusion.

Recommendation 1: NTMABS should not only continue as a specialized support agency within MABS, but develop a more ambitious, strategic role.

The CIB/MABS Forum is a shared space where issues of policy can be discussed and debated in a structured and open way, developed and reported, including the role of specialized support and other agencies. This Forum could deal with operational issues, such as the introduction of an ethnic identifier.

Recommendation 2: NTMABS to seek and obtain member status at the CIB/ MABS Forum in order to ensure it is aware of the issues across the MABS Network. The application of an ethnic identifier could be progressed at this Forum.

7.2.2. NTMABS Focus & Activities

Community Education and engagement with local MABS

Over the next number of years the capacity of local MABS companies to take on any additional work, training and capacity building will be compromised as they become increasingly immersed in their role as intermediaries in the personal insolvency legislation.

Recommendation 3: NTMABS may need to re-conceptualise its community education model in recognition of the fact in the short to medium term local MABS companies may have very limited capacity to engage in community education related activities, so as to focus more on debt prevention. Despite this, it is important that connections to mainstream MABS providers be maintained as best as possible and extended to CIS.

Strategic casework

NTMABS should take on a casework function for (1) complex cases beyond the competence of local MABS and (2) a strategic casework function that will promote systemic change for those affected by financial exclusion, the outcomes to be shared and disseminated to MABS, the CISs, the CIB and further afield, leading to significant new ground truth about financial inclusion. Routine casework should not be accepted.

Recommendation 4: NTMABS take on a formal casework function focused on small number (maximum 3-4 cases per year) of complex and strategic cases critical to financial inclusion and financial literacy, sharing and disseminating the learning with MABS, the CISs and CIB. This will require the setting of clear, well understood and communicated criteria through an updated client assessment policy; the informing of MABS, CISs and CIB accordingly.

At Policy Level

This evaluation identified how well NTMABS was networked at horizontal level, but that vertical engagement with national level (with state agencies, government departments and other authorities concerned with financial exclusion) and European level could be developed.

Recommendation 5: Engage vertically with policy-making bodies

- **At a national level: in a small number of priority areas of financial inclusion, seeking representation on advisory bodies. A short situational analysis would first be useful, followed by a strategy with the identification of key institutions and individuals; and a mailing list.**
- **At EU level: establish connections with and affiliations to relevant European networks, participate in their activities and ensure that more enlightened European models inform Irish policies against financial exclusion.**

Pilots and Schemes

Although individual pilot schemes were developed with some success, no systems were put in place for their time limits, mainstreaming, overall evaluation or dissemination; and NTMABS has found itself drawn in to their routine administration. This remains a valid and important field of work, provided it is undertaken systematically.

Recommendation 6: NTMABS must find a way to devolve responsibility for the administration of loan schemes, either to another organization or have the task contracted out.

Recommendation 7: NTMABS should re-design its approach to pilots, setting time limits and putting in place, at the start, arrangements for individual and comprehensive evaluation, disseminating, up scaling and mainstreaming.

Communications

There is a need for NTMABS to increase and re-focus the level of its media activity, for this will reinforce the engagement outlined in recommendation 6. This will require the development of its principal communications tool, its mailing list, which should be a top priority.

Recommendation 8: Radically improve NTMABS media footprint, appoint a media spokesperson, get interviews, articles and coverage into mainstream printed and electronic media, as well as specialized media related to financial exclusion. A mailing list is a priority.

Recommendation 9: Finalise the work on refocusing the NTMABS website, to carry much more information about NTMABS and its publications, dropping material about other organizations; enhancing the use of social media tools (e.g. Facebook, Twitter, Vimeo) for information sharing purposes. A short media strategy should be first developed.

7.2.3! NTMABS Resources

Recommendation 10: Reconfigure and upskill human resources in such a way as to meet the changing priorities of NTMABS (see recommendations 4 and, 5 in particular).

The Board & Governance

The board performs a valuable role in supporting the staff and ensuring that the organization is fully compliant with the requirements of the CIB and its other legal responsibilities. This evaluation outlined the importance not only of widening the skills base but that the board should take a leading, strategic role. Modifications are also suggested that will address the organizational issues raised in chapter 3.

Recommendation 11: The board should take a leadership role in ensuring that NTMABS develop its policy role in promoting Traveller financial inclusion, with board members presenting publicly on issues of financial inclusion and developing thinking as to how that can be promoted and achieved. Consideration should be given to the establishment of a research, communication and policy focused board sub-committee to support this work.

Recommendation 12: Continue to strengthen the board by the addition of board members with skills in those areas where this report has highlighted deficits, namely media, evaluation, public administration and metrics. Public recruitment (e.g. through Boardmatch) should be considered. Three Travellers will join the Board in 2014.¹¹¹

Recommendation 13: To address the organizational issues discussed in chapter 3, there should be an arrangement for a mutual board seat with MABSndI. There should be representation of the CIB on the NTMABS board. There is scope for linkages, probably informal rather than formal, with the local authorities and the Irish League of Credit Unions.

7.2.4! Operational Issues

Although NTMABS is a small, lean organization, there are several ways in which its effectiveness could be sharpened. There is a need for NTMABS to:

Recommendation 14: Develop metrics and protocols to:

- 1) Ensure that all aspects of the work of NTMABS are fully captured and recorded, especially for the annual report;
- 2) Capture those areas raised in 6.2, namely participation in community education and training; local area development, publications outputs, website statistics, media impact, engagement with state agencies and volunteer time;

Recommendation 15: Redevelop the annual report beyond its current narrative and accounting function into an advocacy role that outlines the key issues of financial exclusion facing the Traveller community, sets a situational analysis, reflects on the key issues arising, examines how they should be resolved and has messages the relevant actors. It should be published promptly (e.g. the 2014 annual report [covering 2013] not later than April 2014) and themed around key issues.

We were invited to prioritize these recommendations according to timescale and suggest the following (table 7.2):

¹¹¹ Catherine Joyce, Bridget Quilligan, Missy Collins.

Table 7.2: Suggested time prioritization of recommendations		
Short	Medium	Overall/long-term
4: <i>Criteria for complex, strategic casework</i>	2: <i>Ethnic identifier and shared space for policy debate within MABS/CIS/CIB</i>	1: <i>More ambitious, strategic role</i>
5: <i>Situational analysis of policy-makers, European networks; mailing list</i>	3: <i>Revised community education model</i>	8: <i>Improvement in media footprint</i>
6: <i>Identify ways to devolve loan administration</i>	4: <i>Development complex, strategic casework</i>	11: <i>Board leadership role as a voice on financial exclusion</i>
7: <i>Criteria for pilots</i>	5: <i>Commence engagement with policy-makers, European networks</i>	
8: <i>Media strategy, mailing list</i>	6: <i>Devolve loan administration;</i>	
9: <i>Refocus website</i>	7: <i>New approach to pilots</i>	
10: <i>Reconfiguration of human resources for 3, 4</i>	12: <i>Strengthening of board with new skills</i>	
11: <i>Board subcommittee for policy, research, communications</i>		
13: <i>Mutual seat recognition</i>		
14: <i>Revise, improve metrics</i>		
15: <i>Revise, improve annual report</i>		

As may be seen, work on several of these tasks can begin quickly (left column), before being put into effect in the medium term (middle column), leading to long-term change.

7.3! Final remarks

NTMABS is a small but effective, skilled and experienced organization working in a challenging economic, social and financial environment and in a complex institutional setting. The case for a specialized agency which focusses on Travellers is a convincing one. Its base is sufficiently strong for its role to be more ambitious, with an engagement with the principal institutional actors concerned with financial exclusion, a strategic casework function, a stronger media footprint and a European dimension. We recommend a number of specific changes which, in our view, would considerably enhance its performance and impact.

Annex 1! Detailed terms of reference

1 Review the role, value, extent and nature of the relationships between NTMABS, MABS the CIS and the CIB

- Outline the role and functions of NTMABS and how these align with the roles and functions of CIB and its delivery partners, MABS and Citizens Information Services (CIS);
- Examine the added value that NTMABS brings to CIB as a unique agency with a clear focus on difference & diversity;
- Assess the contribution of NTMABS in building effective local networks between Travellers, MABS and other relevant service providers;
- Establish the level of engagement & collaboration with MABS & the CIS;
- Identify the extent of joint working / joint projects in common areas at organizational level and with CIB, MABS and MABSndI, the central support service;
- Establish the level of shared understanding of the statutory role and responsibilities of CIB with NTMABS;
- Establish the extent to which NTMABS's organizational structure is aligned with the strategic needs of CIB;
- Establish the extent to which a shared and consistent organizational view is understood & presented to third parties & the public e.g. in policy submissions, PR events etc. & make recommendations accordingly;
- Establish the appropriateness of NTMABS Memorandum and Articles of Association in the context of CIB's statutory obligations;
- Make recommendations to ensure better alignment of the roles, structure and functions of NTMABS with MABS, CIS and CIB and better co-ordination so that the needs of the Traveller community are best served while ensuring an efficient and effective use of public monies.

2 Review the role and value of NTMABS to the Traveller community,

- Identify whether the aims and intended outcomes of NTMABS reflect the needs of the Traveller community;
- Assess the capacity of NTMABS to adapt to the changing needs of the Traveller community in terms of the broader socio economic issues in Ireland;
- Assess the contribution of NTMABS in the development, promotion and implementation of a community education programme for the Traveller community;
- Establish the level of engagement and collaboration with other dedicated Traveller organizations and organizations who work with the Traveller community.

3 Examine the value of the piloting and social policy work of NTMABS' work

- Examine to what extent NT MABS has affected change through piloting alternative financing projects;
- Develop social policy as related to financial and social inclusion issues

4 Identify and assess the effectiveness and efficiency of NTMABS in relation to:

- Use of resources;
- Boundaries and possible overlaps and duplication of work with other organizations, ensuring clarity between them.