



**Trinity Housing
Annual Progress Report
(2008-09)**

To

**Equality Commission for Northern
Ireland**

17 August 2009

EQUALITY COMMISSION FOR NORTHERN IRELAND
Public Authority 2008 - 2009
Annual Progress Report on Section 75 of the NI Act 1998 and
Section 49A of the Disability Discrimination Order (DDO) 2006

Name of public authority

Trinity Housing Ltd

Equality Officer

S75 and DDO:
Victoria McCullough
Senior Corporate Services Officer
Trinity Housing Ltd
Maple House
Beechill Business Park
96 Beechill Road
Belfast
BT8 7QN
T: 02890 6900250
F: 02890 690251
M: 02890 690265
E: victoriamccullough@trinityha.org

S75 Executive Summary

Trinity Housing is committed to fulfilling its responsibilities under section 75 of the Northern Ireland Act 1998. In its Equality Scheme, the Association gave an undertaking to carry out an Equality Impact Assessment (EQIA) on each policy, or group of related policies, where screening had indicated significant issues in relation to one or more of the nine equality categories.

The Association screened all of its policies during 2004-2005 as part of the Joint Equality Exercise coordinated by the Northern Ireland Federation of Housing Associations (NIFHA). The results of this exercise, including the proposed EQIA programme, were subject to a 12 week consultation period between July and September 2005. A 5 year timetable was established to conduct Equality Impact Assessments and Trinity Housing is currently in the fourth year of this process.

The Association's third Annual Progress Report to the Equality Commission details our progress to date, current position and future aims with regards to our Equality Scheme. In line with the 5 year timetable, the Association has completed Year 1 EQIAs on Access and Communication and Complaints; Year 2 EQIAs on Housing Management and Maintenance and; Year 3 EQIAs on Care and Support and Human Resources (HR) Recruitment & Selection. These EQIAs are now at stage 7 and are subject to monitoring. During 2008-09, following the joint public consultation on the year 3 EQIAs, the Association received feedback on these documents and no immediate changes were required to the policies. Work on Year 4 EQIAs, Charging Policies and HR During Employment, began in November 2008. Year 4 EQIAs are currently at stage 4 of the process for conducting EQIAs and will shortly go to a formal public consultation exercise. Furthermore, Trinity Housing submitted a Disability Action Plan to the Equality Commission in June 2007 and work on this is ongoing.

Trinity Housing continues to be committed to ensuring that all necessary resources are made available to support the effective promotion of equality of opportunity and good relations in all its policies and practices. This includes making sure there are effective internal arrangements in place to ensure the duties are effectively complied with and are monitored and reviewed accordingly.

The following provides information on the main initiatives planned in the coming year to ensure the Association improves outcomes in terms of equality of opportunity and good relations for individuals from the nine categories covered by Section 75.

In the coming year the Association will continue to:

- Meet the equality objectives as set out in its Business Plan.
- Continue to provide updates on Equality work to stakeholders and communicate progress to staff, Board members and tenants.
- Continue to provide training on equality as necessary.
- Monitor progress on the Disability Action Plan and Equality Scheme.
- Investigate opportunities to maintain the profile and importance of equality issues and the need for diversity in the Association’s work and activities.

The following table details examples of changes to policies or practices which have resulted in outcomes:

	Outline change in policy or practice which have resulted in outcomes	Tick if result of EQIA
Persons of different religious belief	•	
Persons of different political opinion	•	
Persons of different racial groups	• Use of Language Line	✓
Persons of different age	• Alteration to policies resulting from Age Discrimination legislation	
Persons with different marital status	•	
Persons of different sexual orientation	•	
Men and women generally	•	
Persons with and without a disability	<ul style="list-style-type: none"> • Text phone added to contact details • Facility to provide materials in alternative formats on request • Alterations to buildings including Association offices 	<ul style="list-style-type: none"> ✓ ✓
Persons with and without dependants	•	

Section 1: Strategic Implementation of the Section 75 Duties

The following outlines evidence of progress made by the Association in developing and meeting equality and good relations objectives, performance indicators and targets in corporate and annual operating plans during 2008-09.

Trinity Housing sets out objectives in its business plan in order to ensure progress is made in developing and meeting equality and good relations duties. Targets were incorporated into the Association's corporate plan for the year ending 31st March 2009 and the Association can report that those corporate objectives were met and continue to be monitored.

The Association's targets for 2008-09 were:

- a. To ensure our corporate objectives are completed for year 3 EQIAs on Care & Support and HR Recruitment & Selection and to continue to monitor year 1 and 2 EQIAs and our Disability Action plan.
- b. To review training to ensure all staff and board members retain adequate awareness of the Association's duties.
- c. To induct and train new staff in order that they are aware of their responsibilities to the Association and to the wider public and for them to have regard for the Association's Equality obligations.

Evidence of progress made in relation to the above targets:

- Year 1, 2 and 3 EQIAs have been completed and are subject to monitoring (See section 3 – table 2). The Association continues to monitor the disability action plan which was submitted to the Equality Commission in June 2007. An update/review of the Disability Action Plan was undertaken during the year and is due for completion in April 2009. The purpose of the review is to update the Plan. The format has been changed to include a list of previous action measures and lists action points that are ongoing.
- Updates on Equality were provided regularly during the year to staff at staff training sessions and also to Board members at Board meetings. Key stakeholders were also updated on progress in the Association's annual report.
- During April 2008 – March 2009, 7 new staff joined the Association and at their induction they were made aware of the Association's Equality

obligations. An Equality scheme section is included in induction packs. No new Board members were recruited during the reporting period.

- Following a review of access to information services, various measures were taken for example:
 - Provision of a Minicom (text phone).
 - Continued promotion of language line and availability of documents in alternative formats on request.
 - Trinity Housing's website is under construction and discussions are ongoing to ensure it meets the relevant access standards.
 - The Association has a dedicated Officer as a point of contact for equality related issues.

Section 2: Screening

The table below provides detail on the five year EQIA timetable.

Five year EQIA timetable

Title of policy subject to screening	Was the <u>F</u>ull Screening Report or the <u>R</u>esult of initial screening issued for consultation? <i>Please enter <u>F</u> or <u>R</u></i>	Was initial screening decision changed following consultation? <u>Yes/No</u>	Is policy being subject to EQIA? <u>Yes/No</u>? If yes indicate year for assessment.
Access and Communications	F	No	Yes – Year 1
Allocations	F	No	No
Care and Support	F	No	Yes – Year 3
Charging Policies	F	No	Yes – Year 4
Complaints	F	No	Yes - Year 1
Corporate	F	No	No
Development	F	No	No
Finance	F	No	No
Governance	F	Yes – decision was taken to treat this matter as a policy development matter instead of conducting programmed EQIA	No
House Sales	F	No	No
Housing Management	F	No	Yes – Year 2
Human Resources (Recruitment & Selection)	F	No	Yes – Year 3
Human Resources (During Employment)	F	No	Yes – Year 4
Human Resources (Staff Exit)	F	No	No
Maintenance	F	No	Yes – Year 2
Procurement	F	No	Yes – Year 5

Section 3: Equality Impact Assessment (EQIA)

Please see below for an update of policies subject to EQIA during 2008-09, stage 7 EQIA monitoring activities and an indicative EQIA timetable for 2009-10:

EQIA Timetable – April 2008 - March 2009

Title of Policy EQIA	EQIA Stage at end March 09 (Steps 1-6)	Outline adjustments to policy intended to benefit individuals, and the relevant Section 75 categories due to be affected.
Charging Policies	4	
HR During Employment	4	

Ongoing EQIA Monitoring Activities April 2008- March 2009

Title of EQIA subject to Stage 7 monitoring	Indicate if differential impacts previously identified have reduced or increased	Indicate if adverse impacts previously identified have reduced or increased
Access and Communication	Reduced	Reduced
Complaints	Reduced	None identified
Housing Management	None identified	None identified
Maintenance	None identified	None identified
HR Recruitment & Selection	Reduced	None identified
Care & Support	None identified	None identified

2009-10 EQIA Time-table

Title of EQIAs due to be commenced during April 2009 – March 2010	Existing or New policy?	Please indicate expected timescale of Decision Making stage i.e. Stage 6
Charging Policies – ongoing	Existing	December 2009
HR During Employment - ongoing	Existing	December 2009
Procurement	Existing	December 2010

Section 4: Training

This section outlines training provision during the year associated with the Section 75 Duties/Equality Scheme requirements including types of training provision and conclusions from any training evaluations.

Training undertaken during 2008-09 and Planned Training for 2009-10:

Induction

- During April 2008 – March 2009, 7 new staff joined the Association and at their induction they were made aware of the Association's Equality obligations. An Equality scheme section is included in induction packs. No new Board members were recruited during the reporting period.

EQIA Training

- November 2008 – Finance Manager attended an information session organised by NIFHA on Charging Policies.
- December 2008 – a member of staff attended an Equality Meeting organised by NIFHA to hear proposals for Year 4 EQIAs, to agree a timetable, feedback on the Annual Progress Report to ECNI and hear forthcoming changes in relation to Section 75.
- December 2008 – A member of staff attended a seminar organised by NIFHA on Section 75 Managing the Process which gave an overview of Section 75: Past, Present and Future and Screening & EQIAs.

Equality Awareness Training

- May 2008 – A Presentation was given to staff at staff training on DDO.
- September 2008 - a member of staff attended an Equality Awareness seminar delivered by the Equality Commission for Northern Ireland.
- October 2008 - a member of staff attended a seminar delivered by Legal Island on Essentials of Equality Law.
- October 2008 – a member of staff attended the Launch event for eliminating SO Discrimination in NI held by the Equality Commission for NI.

- November 2008 - Equality and Diversity Training was delivered to all staff by Denise Cranston Consulting. Feedback from staff for this session was very positive.

Other

- RQIA Strengthening User Involvement in Northern Ireland.
- Best Practice in Design for People with Dementia.
- Home Adaptation and OT Recommendations.
- Supported Housing Regulation.

The Association plans to provide further Equality training to Board members and staff during 2009-10 as necessary.

Section 5: Communication

The following outlines how the Association communicated progress on delivery of the Section 75 Duties during the year and evidence of the impact/success of such activities.

Association's Annual Progress Report to Equality Commission

Annual Report for 2007/08 on the implementation of the Association's Equality Scheme was submitted to the Equality Commission in August 2008. A copy of this report was made available to key stakeholders.

EQIA Consultation Documents

EQIA Reports that reach stage 5 of the process are issued to all consultee organisations and made available to key stakeholders.

Trinity Housing Association's Annual Report 2008/09

Update on the Association's Equality scheme and Disability Action Plan is included in the Association's Annual Report. This report is issued to all key stakeholders.

Tenant's Newsletter

The Association produces two Tenants Newsletters annually and these are a very useful tool to communicate with key stakeholders. Progress on equality and disability duties are included in this Newsletter.

Tenant's Forum

The Creation of the Tenants Forum has provided a very direct forum to consult with key stakeholders. Tenants Forums are held twice a year with particular attention being paid to the location and accessibility of venues. This provides an opportunity to communicate with key stakeholders.

Website

Work on the Association's website has commenced and is ongoing. When the website is operational, Equality documents will be made available here i.e. Equality scheme, Disability Action plan and EQIA reports. The website currently provides detail on our Equality Scheme, timetable and Disability Action Plan.

Events at Housing Schemes

Various events are held at our housing schemes on an ongoing basis for example, Multicultural Awareness Day, Falls Awareness Day, Cross Community Trips facilitated by the PSNI. Further detail on events can be found on page 16 of this report.

Internal Communications

- Board members and staff are updated regularly on the progress of Equality work.
- A DDA Forum meets to monitor and report on issues in relation to the Association's Disability Action Plan.
- The Association has set up an equality forum with a representative from each department to monitor and report on equality issues.
- There is an equality section on the Association's intranet where equality documents are made available for staff.
- There are a number of internal meetings at an operational level where equality can arise as part of the agenda.

Section 6: Data Collection & Analysis

The following outlines the systems that were established during the year to supplement available statistical and qualitative research or any research undertaken/commissioned to obtain information on the needs and experiences of individuals from the nine categories covered by Section 75.

The main sources of data collected were from the Association's own internal management systems and include the following:

- NICORE* – statistics of all lettings made by the Association which includes 7 of the 9 groups.
- The Association's Data Protection form includes a section to gather information on Political Opinion and Sexual Orientation.
- Monitoring forms for Applicants and current staff
- Housing Waiting List data
- Tenant Satisfaction Surveys
- Service Reviews
- Mystery Shopping Exercise (SCNI)
- Comments, Compliments and Complaints give opportunity for feedback
- Responses to the consultation documents
- Annual Report from the Northern Ireland Commissioner for Complaints
- Code of practice/guidance from the Equality Commission
- Benchmarking exercise

External data was collected from the following sources:

- Pre-consultation research commissioned by NIFHA and undertaken by IMS Consultants. (For further information on the joint work carried out by NIFHA and Housing Association's on data collection refer to Appendix 1).
- The Association can also refer to Northern Ireland Statistics and Research Agency website as and when necessary.

Below outlines use of the Commission's Section 75 Monitoring Guide:

- The Association revised its monitoring form and consulted the Commission's Section 75 Monitoring Guide for that purpose.

*NICORE is data collected for NIFHA by Housing Associations for new tenants. It covers all of the equality groups except sexual orientation and political opinion which Trinity collects separately at sign up.

Section 7: Information Provision, Access to Information and Services

This section provides details of any initiatives/steps taken during the year, including take up, to improve access to services including provision of information in accessible formats.

No requests for information in alternative formats or interpretation services were required by our service users during the period 1st April 2008 to 31st March 2009. However, the Association states on its publications that this is available and has systems in place to provide information and publications in alternative formats on request.

The Association also has Language Line, a telephone based interpretation service, in place. To date, no one has availed of this service however availability of it was made known to an individual but after consideration the service was not required.

The Association is planning to send out a tenant satisfaction survey to include a section on access.

Section 8: Complaints

During the period 1 April 2008 to 31 March 2009 the Association received 15 complaints. None of the complaints received related to section 75.

Section 9: Consultation and Engagement

Section 9 provides details of the measures taken to enhance the level of engagement with individuals and representative groups during the year.

Formal consultation with individuals and representative groups was conducted and co-coordinated by NIFHA as part of the joint Equality Exercise on Year 3 of the EQIA programme. (See Appendix 1 Consultation and Engagement). All responses to the consultation exercise are collated and referred back to the Association.

Trinity Housing also consults and engages with its tenants and a range of voluntary and community groups throughout the year as part of its ongoing activities. Trinity aims to continue and further develop this work and to seek further opportunities to engage with local and regional groups to ensure that consultation is inclusive.

Section 10: The Good Relations Duty

This section provides details of additional steps taken to implement or progress the good relations duty during year as well as the findings or expected outcomes from this work.

The Association continues to progress the good relations duty. Trinity Housing provides general needs family housing, housing for the elderly and supported accommodation. During 2008-09 various events were organised by the housing department and held at our schemes for example:

- A multicultural event was organised for our tenants where representatives from the Chinese and Indian Community attended to talk about their traditions and customs. A typical Indian meal was prepared by representatives of the Indian Community and served to tenants for lunch.
- An event was held at one of our sheltered schemes to mark World Elder Abuse Day to raise awareness of elder abuse. Attendees included representatives from Engage with Age, The Office of Care and Protection, Age Concern and PSNI.
- Falls Awareness Day was organised to raise awareness among our elderly tenants of the dangers of falling.
- The Housing Department attended the Sheltered Housing Conference where one of our scheme Co-ordinators did a presentation about her involvement in intergenerational work. This initiative sees local school children and elderly residents living in our sheltered housing scheme come together to work on various projects. The project aim is to increase understanding and improve community relations between different age groups, to facilitate the interaction of older tenants with the wider community and to encourage mutual respect and understanding of the needs of the Association's tenants living in sheltered accommodation.
- To mark Age Awareness Week a coffee morning was held at one of our sheltered housing schemes with speakers from Age Concern and Occupational Therapists from Health & Social Care Trusts.
- A coffee morning was held at one of our supported schemes to mark World Mental Health Day.
- Tenants from one of our sheltered schemes attended Cross Community day trips facilitated by the PSNI.

These initiatives have been successful and received positive feedback. The Association plans to programme further events in the future.

Trinity Housing has also submitted a housing scheme under the “shared futures” initiative. The project is subject to planning permission and departmental approval. The aim of this project is to promote good relations and tolerance between people of different religions through the construction of a scheme for the purpose of providing mixed community housing.

The Association as an employer is committed to equality of opportunity and strives to provide a safe and neutral workplace for its employees.

Below outlines use of the Commission’s Good Relations Guide:

The Association received the Commission’s Good Relations Guide and has found this to be a useful source of information. In addition to the initiatives already undertaken by the Association with regards to promoting good relations, consideration will be given at a future equality meeting to implementing some of the good practice examples in the Guide.

Section 11: Additional Comments

The Association is aware and has set a target that one of the outcomes it is seeking by undertaking the EQIA is to mainstream equality of opportunity and good relations in all aspects of the Association’s work including the improvement of access to services, to improve the quality and efficiency of service delivery and to ensure that equality is central to all policies and policy making.

Annual Report 1 April 2008 / 31 March 2009
'Disability Duties' Questions

1. How many action measures for this **reporting period** have been?

20

Fully
Achieved

3

Partially
Achieved

Not
Achieved

2. Please outline the following detail on **all actions that have been fully achieved** in the reporting period.

2 (a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

Level	Public Life Action Measures	Outputs ¹	Outcomes / Impact ²
National ³	N/A		
Regional ⁴	Department for Social Development / NIFHA	There have been a number of public consultations regarding policies which impact on regional services	Influence Policy
Local ⁵	Internal Tenant Forums and Tenant Meetings	Attendance positive at forums and meetings	Increase awareness

¹ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

² **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

³ **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments

⁴ **Regional**: Situations where people can influence policy decision making at a middle impact level

⁵ **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local fora.

2(b) What **training action measures** were achieved in this reporting period?

	Training Action Measures	Outputs	Outcome / Impact
1	Induction – Advise new staff of Association’s obligations under the Disability Duties	7 new staff joined the Association during the period 1 April 2008 to 31 March 2009	Increase awareness of disability duties
2	Training to staff on disability duties	Presentation to staff on DDO in May 2008	Increase awareness of disability duties
3	Equality and Diversity	Training to all staff in November 2008	Increase awareness of equality and disability duties
4	Essentials of Equality Law	Seminar attended by HR staff	Increased knowledge in this area

2(c) What Positive attitudes **action measures** in the area of **Communications** were achieved in this reporting period?

	Communications Action Measures	Outputs	Outcome / Impact
1	Trinity Housing Annual Report / Trinity Newsletter	Update to key stakeholders on progress of equality and disability duties	Increased Awareness
2	Disability Action Plan (updated version)	Available to staff via the intranet and stakeholders notified in Newsletter	Increased Awareness
3	Annual Report to ECNI	Available to staff and stakeholders	Increased awareness and demonstration of progress
4	Official Openings and Events at housing schemes	To celebrate and communicate with tenants in an inclusive way	Promotes positive attitudes

2 (d) What action measures were achieved to ‘**encourage others**’ to promote the two duties:

	Encourage others Action Measures	Outputs	Outcome / Impact
1	General Awareness of the duties to key stakeholders	Training and communication	Increasing awareness increases tolerance, respect and understanding.
2	Specific project events and official openings	To celebrate and communicate with tenants in an inclusive way	Encourage participation

2 (e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs	Outcomes / Impact
1	DDA Forum set up	Meetings held on a 6 monthly basis to review and monitor action points in relation to the duties	Association keeps focus on the duties and continues to take appropriate action measures
2	Complete an audit of sheltered and supported housing schemes with regards to disability and access	Following audit, short, medium and long term objectives to be implemented as required.	Monitor and ensure compliance

3. Please outline what action measures have been **partly achieved** as follows:

	Action Measures partly achieved	Milestones ⁶ / Outputs	Outcomes/Impacts	Reasons not fully achieved
1	DDA audits of our schemes carried out. As a result short, medium and long term objectives for action were set. Medium term objectives for occupation and use of our premises partly achieved.	Working through priorities – all short term objectives have been achieved and work has begun on medium term objectives.	Under constant review	In consultation with tenants no action yet required.

⁶ **Milestones** – Please outline what part progress has been made towards the particular measures; even if full output or outcomes/ impact have not been achieved.

4. Please outline what **action measures have not been achieved** and the reasons why?

	Action Measures not met	Reasons
1	DDA audits of our schemes carried out. As a result short, medium and long term objectives for action were set. Regarding long term objectives for occupation and use of our premises no action currently required.	Working through priorities and in consultation with tenants and scheme coordinators no action is currently required.

5. What **monitoring tools** have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?

(a) Qualitative

- DDA forum meets throughout the year to discuss/review any issues and monitor progress.
- Form to record and monitor accessibility issues at schemes.
- Monthly and quarterly scheme visits record any issues.
- Scheme co-ordinator meetings, tenant forum meetings and scheme visits are an opportunity to raise issues.

(b) Quantitative

- NICORE form records if applicant has a disability as registered in the Disability Discrimination Act.
- Association has a Register to record number of Adaptations carried out at properties.

6. As a result of monitoring progress against actions, has your organisation either:
- made any **revisions** to your plan during the reporting period or
 - taken any **additional steps** to meet the disability duties which were **not outlined in your original** disability action plan / any other changes.

Please delete: Yes

A review of the Plan is underway and due to be completed in April 2009. The purpose of the review is to update the Plan and it will be made available for staff on the intranet. The format has been changed to include a list of previous action measures and lists action points that are ongoing. The plan continues to be monitored.

If yes please outline below:

	Revised/Additional Action Measures	Performance Indicator	Timescale
1	The Association's website is being created and measures will be taken to ensure it meets the required accessibility standards.	Feedback on the website.	July 2009-June 2010.

7. Do you intend to make any further **revisions to your plan** in light of your organisations annual review of the plan? If so, please outline proposed changes?

None currently planned



APPENDIX 1

Housing Associations' Joint Equality Exercise

Annual Progress Report 2008-09

The Northern Ireland Federation of Housing Associations (NIFHA) is the umbrella body for 33 registered and 7 non-registered housing associations in Northern Ireland. NIFHA is not a designated body, but since 2004 the Federation has been assisting members to implement the Statutory Equality Duties. The designated associations have participated in this joint approach co-ordinated by NIFHA throughout the initial development of Equality Schemes and in the roll out of their agreed EQIA timetable.

This joint work has been facilitated by the Federation's Corporate Services Manager and the EQIA Co-ordination Group (ECG) comprised of individuals across the membership. From January 2009 responsibility for steering the joint exercise moved to the Federation's Business Committee. Responsibility for discharging the Statutory Equality and Good Relations Duties within the individual organisation lies with each designated housing association. NIFHA's role is purely a supportive one. The following information outlines the collective work that was carried out with or on behalf of NIFHA's member associations.

General

Between April 2008 and March 2009 the Federation provided support for members participating in the Joint Equality process by:

- Facilitating / providing administrative services for 7 meetings of the ECG
- Issuing 'E Cards' as prompts for action and / or as information updates
- Providing updates on equality & diversity in NIFHA's twice monthly e-News
- Arranging meetings and joint events as appropriate
- Organising training relevant to the associations' equality work
- Co-ordinating all relevant Public Consultation exercises
- Arranging joint Public Notices relating to the designated Housing Associations' equality work
- Acting as a conduit for information and consultee responses
- Managing, maintaining and sharing a Joint Consultee List
- Reflecting the views of members when responding to equality-related consultations undertaken by other organisations
- Liaising with the Equality Commission for Northern Ireland
- Representing the housing association movement through participation in the NI Housing Executive's (NIHE) Consultative Forum on Equality
- Acting as a liaison point for organisations representing Section 75 groups
- Providing support (in the form of information, advice, and templates) to assist designated associations in fulfilling their statutory duties

EQIA Process

Between April 2008 and March 2009 NIFHA co-ordinated joint work on the third and fourth years of our members' collective Equality Impact Assessment (EQIA) timetable. During the reporting period we worked collaboratively with associations to complete the Year 3 EQIAs and begin those scheduled for Year 4. The following table details the Equality Impact Assessments conducted within this time frame.

Year 3 Equality Impact Assessments	Year 4 Equality Impact Assessments
<ul style="list-style-type: none"> • Care & Support policies • HR Recruitment & Selection policies 	<ul style="list-style-type: none"> • Charging policies • HR During Employment policies

NIFHA's participation in the joint work on the Year 3 EQIA process ended at Stage 6 when the Federation placed public notices announcing the availability of the final reports. All the associations' reports were also made available (on request) by NIFHA in the form of a composite disc. Requests for hard copies or individual reports were referred to and handled by the relevant association.

NIFHA's members commenced Year 4 of the planned EQIA timetable in November 2008. The housing associations' Charging and Human Resources (During Employment) policies were the focus of the reviews. NIFHA facilitated practical events where representatives of all designated associations had the opportunity to review the aims of the policies to be assessed and determine the scope of the Year 4 EQIA work. As a result of these sessions two working groups were formed to develop templates for the Year 4 EQIA reports which would relate to the way housing associations operate.

As in previous years individuals from a range of associations were actively involved in the development of the template documents. The Federation's Corporate Services Manager and members of the two working groups met regularly between February and July 2009 to draft template documents. All designated associations were given the opportunity to comment on the drafts before they were completed. The purpose of the templates was to make cross-sector comparison easier for consultees.

The Equality Co-ordination Group had been disappointed at the quantity and quality of responses received when we commissioned consultants to undertake pre-consultation research in 2008. Those working on the joint project felt this research method had not been successful on this occasion and comments received indicated a lack of knowledge about associations business. Indeed in the 2008 research document the consultants had stated:

"60% of the issues cited under Care and Support and 50% of the issues cited under HR Recruitment and Selection were unrelated to the policies and focused more on concerns outside of the Housing Associations control. This demonstrates clear misunderstanding about the information required from consultees, personal face to face consultations would help eliminate the confusion."

Following discussions with members a more direct approach to research for Year 4 EQIAs was agreed. Volunteers from relevant NIFHA forum groups (Finance and Human Resources) would be delegated to undertake consultation meetings with representatives of various groups representing the nine S75 categories. Feedback from these pre-consultation meetings would inform the impact assessments. The Year 4 EQIAs were only at the research stage at the end of this reporting period.

Training

During 2008-09, the NIFHA training programme included seminars to assist members with equality and diversity such as:

- Managing Section 75 Processes
- Discovering Diversity

Such events were advertised on www.nifha.org and in a mailing to members, so all designated associations had the opportunity to participate. NIFHA also sign-posted members to other suitable training.

In addition to general training NIFHA arranged a practical workshop on conducting Equality Impact Assessments for those who had not previously been involved in this process. In our member support role the Federation also facilitated occasional sessions for individual associations to raise awareness of their equality obligations.

Communications

Throughout 2008-09 NIFHA's Corporate Services Manager continued to act as liaison between the Equality Commission and the designated housing associations. In addition, the Federation acted as the main link between members and those with an interest in promoting equality of opportunity, such as consultee organisations, voluntary groups or statutory bodies. Reported Federation communication output only relates to the joint aspects of our members' work and is intended to complement each individual association's messages about their respective equality and good relations activities.

NIFHA staff answered queries, provided general information about associations and co-ordinated the public engagement element of the joint exercise. The Federation also used regular publications like POSH magazine or Annual Reports and its website (www.nifha.org) to showcase the work members have undertaken to implement equality of opportunity and promote good relations. POSH is issued three times a year and has a print run of 2000 copies. These publications are circulated to a wide range of individuals and organisations including all those on NIFHA's list of consultee organisations and every elected representative in Northern Ireland.

Federation staff actively participate in the events of other organisations, availing of these opportunities to promote the positive contributions our member associations make in a wide variety of areas including equality and diversity.

Data Collection & Analysis

Research commissioned by NIFHA and conducted by IMS (NI) Ltd for the Year 3 EQIAs was detailed in the Annual Report for 2007-08. As indicated in the section on the EQIA Process NIFHA's members decided to take a different approach to this task for the Year 4 EQIAs. The data collection process for the Year 4 EQIAs had only begun as the reporting period ended.

Information Provision; Access to Information and Services

NIFHA itself is not designated under Section 75 but the Federation has maintained its commitment to producing information and publications like our magazine, POSH, in formats that use accessible fonts and type styles. NIFHA also strives to ensure that information provided on www.nifha.org is accessible and takes a positive approach to requests for production of materials in alternative formats.

The Federation regularly provides information and advice for members in relation to translation, interpretation services and producing material in alternative formats. NIFHA also shares any information received about suppliers of these services. This information sharing is aimed at equipping the housing associations to respond promptly to any requests where accessibility may be a factor. How these services are implemented remains the responsibility of the individual association.

Consultation and Engagement

During 2008-09 NIFHA undertook the following consultation and engagement activities as part of our member support work for the Housing Associations' Joint Equality Exercise:

- Conducted regular pre-consultation exercises to ensure that the joint consultee list continued to be accurate, up-to-date and valid
- Co-ordinated the formal consultation on Year 3 of the EQIA programme on behalf of the designated associations by publicising the 12 week consultation period in the three main Northern Ireland daily papers (June 2008)
- Publicised the public consultation for the Year 3 EQIAs on www.nifha.org
- Issued a composite disc containing the draft EQIA Reports of the 32 designated housing associations to 160 consultee organisations in June 2008 (additional discs were also issued on request and to each member)
- Arranged consultation meetings with various organisations representative of the nine equality categories (June – August 2008)
- Collated consultee feedback and circulated all general consultee responses to designated associations (September 2008)
- Collated final reports of Year 3 EQIAs and publicised their availability in the three main Northern Ireland daily papers (December 2008)
- Issued a composite disc containing the associations' final EQIA Reports on request
- Throughout the year NIFHA staff regularly participated in a range of inter-agency groups which enable engagement with 'equalities' organisations – this is in addition to electronic networking and consultation with relevant groups.
- Where appropriate NIFHA has also consulted with members and provided detailed written responses on relevant consultation exercises by other organisations (see additional comments section).

Good Relations Duty

The Federation continued to be an active participant in the Shared Future Housing Advisory Panel, chaired by the NIHE. The panel is made up of representatives from 15 different organisations engaged in the development of a workable strategy for supporting mixed community housing across Northern Ireland. NIFHA is involved in this group in its role as an umbrella organisation while the individual housing associations implement the strategy within the community. During the reporting period the Federation also explored and encouraged the use of the Shared Housing 'brand' in existing housing association developments. To this end the topic of shared neighbourhoods was the focus of a workshop at NIFHA's Annual Conference in November 2008.

The above-mentioned Advisory Panel commented on the implementation of the strategy in relation to:

- The development of new Shared Future housing schemes (Causeway Meadows, Lisburn was opened on 22 January 2009)
- The Phase 2 of the Shared Neighbourhood Programme (involving 10 existing housing areas)
- The Community Relations Council's report on interfaces

In addition, NIFHA maintained its involvement with a variety of inter-agency groups working to foster good relations, such as:

- Community Relations Council
- Supporting Communities Northern Ireland – NIFHA has a place on the Executive Committee of this organisation
- NICVA

Initiating and maintaining such strategic alliances is integral to our work on behalf our membership. The experience gained through these activities enables NIFHA to offer members useful assistance and share best practice thus enhancing the associations approach to the good relations duty. It also allows the Federation to highlight the many excellent contributions of housing associations in this important area of work.

Disability Duties

Once NIFHA's initial work to help members produce Disability Action Plans had been completed responsibility for their implementation was handed over to the individual association.

In more general terms NIFHA undertakes a range of activities which help ensure the action measures of other bodies and/or cross-sector priorities reflect the needs of disabled people. For example, the Federation's Chief Executive participated in a DHSS & PS Working Group set up to develop accommodation standards for persons with learning disability.

Additional Comments

A significant part of NIFHA's engagement on behalf of members during 2008-09 centred on providing a comprehensive response to the Equality Commission's proposed *new Guidance on Implementing Section 75*. The Federation lobbied strongly on behalf of housing associations, through participation in the Commission's consultation workshops and in a detailed written response, to ensure:

- Our Members would not have to produce a new Equality Scheme until 2010;
- Any new process would be in proportion to an association's size;
- Proposed compliance checks should not add to the already heavy burden of regulation to which housing associations are subject; and
- Proposals which would have required public consultation on every single policy would not be implemented.

The Federation was aided in this task by volunteers from within our membership who participated in the Equality Co-ordination Group, internal discussions and working parties as well as at the various consultation meetings held by the Equality Commission. We believe it is worth reiterating these points in our progress report as the final outworking of the Commission's Review of Section 75 has not yet occurred.

We would like to stress that housing associations are positive about and committed to the equality duties but have a genuine concern that the current system is unnecessarily cumbersome, process driven and demanding of significant resources that could be used to effect real improvements in the equality of opportunity / type of relations experienced by many in our society. In particular, we believe that the existing Section 75 processes are based on a "one size fits all" approach which does not facilitate flexibility. Clearly, a small association with housing stock of less than 200 homes does not have the same impact on public services as the Northern Ireland Housing Executive, a government department or a Health Trust. Therefore, we urge the Equality Commission to devise a system which takes account of this disparity while enabling all designated bodies to make a positive difference.

Lucinda McMurrin

Corporate Services Manager
NIFHA
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