



**Trinity Housing Ltd**

**HUMAN RESOURCES  
During employment**

**Equality Impact Assessment**

**Consultation Document**

**August 2009**

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**Please note that this document is available on request in alternative formats including:**

- **Large print**
- **Audiocassette**
- **Braille**
- **Computer Disc**
- **Alternative languages**

**If you would like an alternative format, please contact:**

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## Contents

		<b>Page</b>
1.	Executive Summary	4
2.	Introduction	5
3.	The Policy	8
4.	Consideration of Available Data & Research	14
5.	Assessment of Impact	17
6.	Consideration of Measures to Mitigate Against Adverse Impact	19
7.	Consultation	20
8.	Next Steps	22
	Appendix 1	23
	Appendix 2	31

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## 1. EXECUTIVE SUMMARY

- 1.1 Trinity Housing Ltd 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 dimensions.
- 1.2 As the representative body for housing associations, the Northern Ireland Federation of Housing Associations (NIFHA) has been assisting its members in the implementation of Section 75 of the Northern Ireland Act 1998 by co-ordinating a joint approach to the equality obligations. Trinity Housing Ltd is part of this joint exercise which is intended to maximise resources for equality work and to minimise the administrative impact on consultee and/or stakeholder organisations.
- 1.3 The Association screened all of its existing policies during 2004-05. The results of this exercise, including the proposed EQIA programme, were subject to a 12 week period of public consultation between July and September 2005.
- 1.4 The aim of the Human Resources (HR) policies during employment is: To operate procedures, set out in law, best practice and industry standards to:
- ensure effective and efficient management of the association
  - comply with relevant statute
  - and ensure well-being of all staff
- while working to achieve organisational aims, objectives and mission statement

This report provides the following information:

- Background information on the equality duties and Trinity Housing Ltd
- A description of the Association's current HR during employment policy areas
- Information on the scope of this review
- The sources of quantitative and qualitative data considered during the review
- Assessment of the impact of the policy on the 9 equality dimensions
- Proposed mitigating measures
- Details on the consultation process
- The next stages of the EQIA.

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## 2. INTRODUCTION

### Statutory Equality Duties

2.1 Section 75 of the Northern Ireland Act requires Trinity Housing Ltd, in carrying out its functions, to have due regard to the need to promote equality of opportunity between:

- Persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Men and women generally;
- Persons with a disability and persons without;
- Persons with dependants and persons without.

2.2 The Association must also, in carrying out its functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

2.3 In line with its equality scheme obligations, the Association screened all of its existing policies to assess whether they impacted on the promotion of equality of opportunity or the duty to promote good relations. The following questions were asked during the screening exercise:

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issue?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant groups.

A report describing the results of the screening process is available from Victoria McCullough, Senior Corporate Services Officer (see contact details on page 2).

2.4 Following this screening process and the associated consultation, the Association developed a 5 Year Equality Impact Assessment programme. HR during employment policies was scheduled for assessment in year four of this programme.

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2.5 This impact assessment has been carried out in accordance with the procedure outlined in the Equality guidance. The eight separate stages of the Equality Impact Assessment are:

1. Determining the aims of the policy
2. Collecting available data
3. Assessing the impact of the policy
4. Consideration of measures to mitigate any adverse impacts and/or alternative policies that might better achieve the promotion of equality of opportunity
5. Formal Consultation
6. Analysis of responses and decision by Association
7. Publication of results of the Equality Impact Assessment
8. Ongoing monitoring of adverse impact.

2.6 The purpose of conducting the Equality Impact Assessment is as follows:

- To identify adverse impacts and to consider mitigating factors which will eliminate adverse impact
- To consider alternative policies which would better promote equality of opportunity.

2.7 This document is a draft for consultation and contains details of the first four elements of the Equality Impact Assessment. The remaining stages will be implemented following consideration of consultation responses.

## 2.8 **About Trinity Housing Ltd**

Trinity Housing was established in 1977 and registered with the Department for Social Development for the provision of housing for elderly persons and for others in housing need.

The role of Trinity Housing today, remains the provision of housing for elderly persons but also includes, in consultation with its care partners, the provision of supported housing for people with special needs as well as general family housing. Trinity Housing works in partnership with both Statutory and other charitable and voluntary agencies for the provision of care and support in its supported housing schemes.

The Association is governed by a Board of Management, which comprises a Chairman and a Board of between 7 and a maximum of 15 members (including Chair). The Board as and when vacancies arise or when additional skills are deemed necessary will make appointments to the Board in accordance with the requirements of the Association.

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Board membership will include a range of expertise including for example, finance, legal construction/engineering, medical housing, human resources, and general business skills and representation from society both church and lay.

The current Board is 8.

The functions of Trinity Housing for purposes of the Act include its powers and duties. In this Scheme the following are to be regarded as the functions:

- Corporate Functions
- Finance and administration
- The development of housing schemes
- The management of housing and provision of housing support services
- Information Technology

The Chief Executive is responsible to the Chairman and the Board of Management of Trinity Housing as a corporate body.

Trinity Housing Senior Management Team includes the following officers:

Arthur Canning	Chief Executive
Helen Colville	Deputy Chief Executive & Head of Housing
Frankie Ormonde	Maintenance & Property Asset Manager
Andrew Bassett	Finance Manager
John Cochrane	Development Manager

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### 3. THE POLICY

#### Description of Policy

The HR during employment policies describe the HR service the Association provides to its staff and the wider community.

#### Policy Aim

3.1 The aim of the HR during employment policies is:

To operate procedures as dictated by law, best practice and industry standards to:

- ensure effective and efficient management;
- comply with relevant statute; and
- ensure well-being of all staff

while working to achieve organisational aims, objectives and mission statement

The scope of the HR activities during employment covered in this policy area include:

- **Employee Relations** – This refers to the interaction of employees with each other or with management. It also covers Trade Union interaction with the associations
- **Terms & Conditions** - This covers the contractual elements of the job
- **Performance Management** – This means the processes the association uses to ensure the objectives of the organisation are achieved
- **Work-Life Balance** – This refers to staff having a measure of control over when, where and how they work
- **Health & Well-being** – This relates to the health and safety of staff

#### Scope of Review

3.2 The main stakeholders in relation to the Human Resources policies that apply during employment are:

##### Internal

- Staff
- Management
- Board Members

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## External

- Applicants for employment and potential recruits
- Department for Social Development (DSD)
- Equality Commission
- Inspection and assessment bodies
- Labour Relations Agency
- Ombudsman\*
- Other Housing Associations / partners or providers of Housing Support Services
- Recruitment Agencies
- Regulation and Quality Inspection Authority
- S75 representative groups
- Tenants / Residents / Staff
- Trade Union Representatives
- Tribunals office
- Voluntary and community sector

## Department for Social Development

Housing Associations are subject to a high degree of regulation with the DSD having specific responsibility for monitoring their activities. The DSD gathers information on a wide range of Association services including HR during employment.

## Equality Commission / LRA

The Equality Commission for NI / LRA carry out a compliance role and publish codes of practice to assist business / organisations meet best practice and statutory obligations.

\*Anyone dissatisfied with the way in which the Association carries out its Human Resources service during employment (after having exhausted the Association's Complaints Procedure) can make a complaint directly to the Ombudsman for an independent review.

The lists at 3.2 are not exhaustive. These lists are in alphabetical order.

## **What this EQIA does not cover**

3.3 We anticipate that some aspects of HR during employment may be considered during all equality impact assessments. Whilst considered to be important by the Association, the following areas do not come under the scope of this equality impact assessment:

- Access & Communications generally as the Year 1 EQIA on this policy dealt with overall issues relating to accessing the association's services (including employment) and communicating with the organisation.

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- Complaints about HR during employment – This was covered by the Year 1 EQIA on Complaints
  - The HR Recruitment and Selection policies and procedures as these were covered in the Year 3 EQIA.
  - The training of Board Members
  - The specific HR policies of joint management partners and recruitment agencies

3.4 The HR during employment policies are intrinsically linked to all of the Association's key policies and processes, depending on the nature of the service.

### **Legislative and Regulatory Requirements**

3.5 The Association is required to comply with a range of legislative and regulatory requirements. Those listed below are relevant to HR during employment service provision:

- The Equal Pay Act (NI) 1970
- The Sex Discrimination (NI) Order 1976
- Health and Safety at Work (NI) Order 1978
- The Rehabilitation of Offenders (NI) Order 1978
- The Rehabilitation of Offenders (Exceptions) Order (NI) 1979 (amended by 1987, 2001 & 2003 Orders)
- The Disability Discrimination Act 1995
- Employment Rights (NI) Order 1996
- The Race Relations (NI) Order 1997
- Part V Police Act 1997
- The Fair Employment and Treatment (NI) Order 1998
- The Human Rights Act 1998
- Section 75 of the Northern Ireland Act 1998
- The Working Time Regulations 1998
- Maternity and Parental Leave etc Regulations 1999
- Sex Discrimination (Gender Reassignment) Regulations (NI) 1999
- Part time Workers (Prevention of Less Favourable Treatment) Regulations (NI) 2000
- Employment Equality (Sexual Orientation) Regulations (NI) 2003
- The Civil Partnership Act 2004
- The Employment Relations (NI) Order 2004
- The Equal Pay (Amendment) Regulations (NI) 2004
- Employment Equality (Sex Discrimination) Regulations (NI) 2005
- Employment (NI) Order 2003 (Dispute Resolution) Regulations (NI) 2005
- Information and Consultation of Employees Regulations (NI) 2005
- The Disability Discrimination (NI) Order 2006
- The Employment Equality (Age) Regulations (NI) 2006

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- The Work and Families (NI) Order 2006
  - Safeguarding Vulnerable Groups (NI) Order 2007

This list is not exhaustive.

3.6 In addition to HR during employment generally, Trinity Housing Ltd must also meet certain obligations, under its Equality Scheme, to ensure that complaints made about failure to meet its equality duties are dealt with effectively.

### **Reasons for Equality Impact Assessment**

3.7 The screening report gave the following reasons for carrying out an impact assessment on the policy:

- (a) Whilst there is a HR during employment policy in place, as part of our commitment to delivering an excellent customer service the Equality Impact Assessment presented an opportunity to improve the existing policy and share best practice across the Housing Association sector.
- (b) The Association believes that access to services, including HR during employment, is of high importance to S75 groups.
- (c) Trinity Housing Ltd also believes that its HR during employment policy merited an equality impact assessment to demonstrate its commitment to providing an efficient and effective service.
- (d) Due to the absence of available data at the time of screening the policy, the decision was taken to assess actual adverse impacts during the conduct of the equality impact assessment.
- (e) The changing nature of this service area means that HR policies are constantly under review and may have altered since the initial screening decision.

### **Implementation of the policy**

3.8 The HR policies during employment have been defined by the Trinity Housing Ltd's Board and / or management team. They are implemented by relevant staff throughout the Association.

3.9 HR during employment policy documents are developed in compliance with any legal requirement and agreed by Trinity Housing's Board and Senior Management Team.

3.10 Trinity Housing Ltd carries out the process of policy development in consultation with staff and through negotiation with their representative

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bodies where it appropriate. It also refers to specialist legal advisors as and when necessary.

### 3.11 Employee Relations

In Trinity Housing Ltd employee relations covers:

- Attendance
- Bullying and harassment
- Core Competency/Probation Review
- Discipline and Grievance
- Open Door Policy
- Annual Holiday Arrangements
- Health and Safety
- Data Protection
- Confidentiality
- General Standards of Service

### 3.12 Terms and Conditions

In Trinity Housing Ltd the contractual elements of the post covered under Terms and Conditions include:

- Remuneration
- Hours of Work/Overtime/Working time procedures
- Overtime
- Lay off
- Probation Period
- Sickness Absence
- Pension
- Notice Entitlements
- Retirement
- Confidentiality
- Customary/Annual Holidays
- Grievance Procedure
- Disciplinary Rules and Procedures
- Equal Opportunities Policy
- Deductions

### 3.13 Performance Management

Delivering quality services requires competent, motivated and committed staff. Performance management is one of the tools Trinity Housing Ltd uses to monitor and the contribution of the individual staff member and to assess whether they are meeting the set objectives.

Our performance management policies cover:

- Appraisal and Performance Objectives
- Core Competency
- Disciplinary and Grievance
- Induction

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- Probation
  - Supervision
  - Training – learning and development

### 3.14 Work-Life Balance

Trinity Housing Ltd offers a range of options to support the work-life of staff, these include:

- Enhanced sickness absence payments
- Enhanced Maternity / Paternity arrangements
- Flexi-time working
- Job share
- Parental Leave
- Special leave

### 3.15 Health and Well-being

Trinity Housing Ltd aims to ensure the well-being of staff through adherence to health and safety legislation and positive practice in the following areas:

- Control of Substances Hazardous to Health (COSHH)
- Display screen equipment
- Drugs and alcohol
- Fleet Safety
- Immunisations
- Infection Control
- Lone Working
- Manual Handling
- Maternity Risk Assessment
- Occupational Health
- Stress Management

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## 4. CONSIDERATION OF AVAILABLE DATA AND RESEARCH

### Sources of information

- 4.1 The following were used in considering available data relevant to the impact of the HR during employment policy:
- a) Targeted pre-consultation meetings with representative bodies held during June – July 2009 as part of the joint exercise co-ordinated by NIFHA
  - b) Internal events to assess the impact of HR (during employment) policies held during April – July 2009
  - c) A general pre-consultation exercise co-ordinated by NIFHA during July 2009
  - d) The Association's internal management information on the profile of applicants and/or job leavers
  - e) Monitoring figures for the Association
  - f) Data collected for the Annual Regulatory Return to the DSD
  - g) Qualitative Feedback from staff during employment
  - h) Internal and external audits
  - i) Complaints and compliments register
  - j) Grievances about the association's human resources policies
  - k) Information collated for monitoring returns
  - l) Equality Commission Codes of Practice
  - m) CIPD research/Legal Island
  - n) A Unified Guide to Promoting Equal Opportunities in Employment
  - o) General feedback to the association

The key issues highlighted by analysis of the above data sources are presented in the following sections.

### Data collection

- 4.2 Volunteers from NIFHA's Human Resources Forum held targeted preliminary consultation sessions were held with a number of representative organisations. Participants included Age Sector Platform, Carers NI, Coalition on Sexual Orientation, Disability Action, Gingerbread, Multi-cultural Resource Centre and Women's Support Network.

Feedback from these pre-consultation meetings with organisations representative of certain Section 75 groups is shown at Appendix 1

- 4.3 Invitations were also made to and apologies received from Age Concern/Help the Aged, the Equality Commission, NICEM, NIACRO

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- 4.4 In addition, NIFHA invited all 142 organisations listed at Appendix 2 to participate in the pre-consultation using the policy documentation available at [www.nifha.org](http://www.nifha.org) or provided in hard copy on request. Interested organisations and individuals were asked to review the policy information and consider the following three issues:
- Do you agree with our assessment of impacts?
  - In terms of the group you represent have we missed anything?
  - Is there anything we could do to improve this policy for the group you represent?
- 4.5 Feedback from the pre-consultation meetings with organisations representative of certain Section 75 groups is shown at Appendix 1

### **Profile of Employees**

- 4.6 Trinity Housing Ltd appointed 7 staff during the period April 2008 – March 2009. All relevant monitoring returns were submitted.
- 4.7 From April 2009, Trinity Housing Ltd requests data on all 9 groups under Section 75 in accordance with the guidance from the Equality Commission. The Association notified all employees of its responsibilities under Section 75, advising staff were obliged to complete the gender and community background sections but submission of information relating to the remaining categories is voluntary.
- 4.8 100% of employees returned their monitoring form between April 2008 and March 2009. Of those monitoring forms returned, the following table represents the how many staff answered under each of the 3 groups:

	% of employees who responded	% of employees who declined to answer
Community Background	100%	0
Date of birth	100%	0
Gender	100%	0

- 4.9 Dependents, Disability, Ethnicity, Martial Status, Political Opinion and Sexual Orientation have only been included in the Monitoring Forms from April 2009 therefore the above figures would not include this data.
- 4.10 The age profile of Trinity Housing Ltd employees is assessed as and when need arises. No employees are in the over 65 age group.

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## Complaints

4.11 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, during the last year the Association has received 1 complaint about its HR During Employment service but none indicated adverse impact resulting from these policies.

## Ombudsman Report

4.12 There have been no complaints submitted to the Ombudsman about Trinity Housing Ltd's Human Resources policies that apply during employment.

## Audit

4.13 The last audit/inspection which the Association had conducted on HR During Employment in November 2007 indicated no corrective action to be carried out.

## General Feedback

4.14 Trinity Housing Ltd was initially accredited with the Investors in People standard in July 2001, and was re-accredited in July 2007. Comments from the auditor included:

*"Trinity Housing Ltd is undoubtedly committed to using the Investors in People framework as a business improvement tool and was able to provide strong evidence that the organisation is meeting all aspects and requirements of the current version of the Investors in People Standard".*

4.15 Exit interviews are carried out with all staff when they leave the Association. There were 5 leavers in the period April 2008 to March 2009. No adverse impact was identified in the associated exit interviews.

4.16 During the period April 2008 to March 2009, the Association received 1 request for flexible working which was granted.

4.17 At September 2009, 0 employees were over the national default retirement age.

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## 5. ASSESSMENT OF IMPACT

- 5.1 This section outlines our assessment of the impact of the Association's HR during employment policy on the 9 Section 75 groups based on the evidence considered above.
- 5.2 The following points outline our preliminary assessment of adverse impacts arising from our HR during employment policies in relation to each of the nine groups.
- 5.3 **Age:** Having reviewed our policies, and the helpful comments from the Age Sector Platform, our initial assessment indicates Trinity Housing Ltd's HR policies which apply during employment do not bring significant differential impact in terms of age.
- 5.4 **Dependants:** Our assessment of the available information suggests Trinity Housing Ltd's policies do not result in significant differential impact for those with dependants as we offer a range of flexible options for employees. However, we recognise there may be some potential for improvement therefore we have included relevant proposals under mitigating measures (section 6).
- 5.5 **Disability:** Our assessment of impacts did not result in identification of significant differential experiences for disabled people due to Trinity Housing Ltd's HR policies during employment. However, our pre-consultation discussions with Disability Action did highlight a number of areas where improvements could be made.
- 5.6 **Gender:** NIFHAs own research highlighted gender imbalances. Figures for the year 2006-07 indicate that HAs employed just over 2500 staff. The gender split was 21 % male to 79% female but at senior level this changes to 68% male and 32% female, this was reflected even further at Chief Executive level of the 38 posts at that time only seven were held by females. By early 2009 female Chief Executives represented 15% of the total for housing associations. As a result of our research and consultation work, there is no indication of differential or adverse resulting from Trinity Housing's HR policies during employment.
- 5.7 **Marital status:** Our research and consultation work have highlighted no significant differential impact in terms of marital status resulting from Trinity Housing Ltd's HR policies during employment
- 5.8 **Political opinion:** This has not been statistically measured but no issues have been raised during consultation that indicate Trinity Housing Ltd's

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HR policies during employment lead to adverse impact on the grounds of political opinion.

- 5.9 **Racial Group:** Our research and consultation work suggest Trinity Housing Ltd's HR policies during employment do not cause significant adverse impact for those from different racial groups. However, the individual's ability to communicate in English was highlighted by the Multi-Cultural Resource Centre as a significant factor for both employment and career progression.
- 5.10 **Religious belief:** No issues have been raised during consultations which indicate Trinity Housing Ltd's HR policies during employment result in significant differential impact because of religious belief.
- 5.11 **Sexual orientation:** Our research and consultation work did not highlight any significant differential impacts relating to sexual orientation which resulted from Trinity Housing Ltd's HR policies during employment. The Rainbow Project made a number of useful suggestions for improvements.
- 5.12 Many of the issues raised during pre-consultation highlighted concerns around Access & Communications in relation to services rather than specifically to HR during employment. Access & Communications was addressed as part of the associations' Year 1 EQIAs. As a result the majority of the concerns mentioned by respondents were either covered by the Mitigating Measures proposed at that time or have been identified for action as part of that process. Nevertheless, this is an important consideration and as such is kept under review so some of the Mitigating Measures listed are intended to improve accessibility.
- 5.13 Other issues reflect general concerns but are not a specific comment on housing associations. We recognise the validity of some of these comments, especially as many associations were originally formed to tackle adverse impact and are committed to providing high quality services for the whole community.
- 5.14 Where we indicate that there is no evidence of adverse impact, this does not mean that no action will be taken. The Association is committed to promoting equality of opportunity for all and excellence in customer service, and will seek, where possible, to put measures in place to ensure that all sections of society have an equal opportunity to access appropriate redress when problems occur.

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## 6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following options could help mitigate against adverse impact arising from Human Resources policies during employment and the Association has, or will give consideration to implementing measures to mitigate against adverse impact:

- Full implementation of guidance regarding the extension of monitoring requirements
- Carry out Employee attitude survey
- Undertake further quantitative and qualitative analysis of employees leaving the association
- Continue to / Offer a range of flexible working options to make posts more suitable for those with caring commitments
- Review of policies subsequently authorised at Board level
- Diversity awareness training for all recruitment panel members
- Reflect diversity in the interview panels
- Highlight the fact that applications can be made available in different formats
- Disability - keep under review accessibility issues/language/disability etc
- Involve staff for consultation when drafting new policies during employment
- IIP re-accreditation
- Proactively take advice from external bodies such as the Labour Relations Agency when drafting or amending policies which may have the ability to be discriminatory
- Promotion of equality issues internally with staff through events, activities and promotional weeks

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## 7. CONSULTATION

- 7.1 Trinity Housing has endeavoured to give careful consideration to the measures that might be taken to make the HR during employment policies most efficient, effective and equitable. The measures outlined in section 6 are not intended to be definitive or exhaustive. The Association is planning to formally consult on its findings over a 12 week period and would welcome feedback on these proposals and any other comments that would assist us to improve the policy.
- 7.2 Trinity Housing will ensure that it consults effectively with those groups directly affected by its HR during employment policy, and their representatives.
- 7.3 Staff will be available to discuss these proposals in person, by telephone, or by e-mail, as requested. Meetings may also be arranged to discuss the way forward and the Equality Impacts of this document, if required.
- 7.4 The period of consultation will end on Friday 18 December 2009.
- 7.5 Comments in relation to this report should be submitted in writing to:
- Victoria McCullough  
Senior Corporate Services Officer
- Trinity Housing Ltd  
Maple House  
Beechill Business Park  
96 Beechill Road  
Belfast  
BT8 7QN
- 7.6 Comments in any other format will also be accepted.
- 7.7 If you require any further information, you may contact the Association using the contact details given in 7.5.

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7.8 If you require information about housing associations generally or about the Joint Equality Exercise co-ordinated by NIFHA please contact:

**The Northern Ireland Federation of Housing Associations**

**38 Hill Street**

**Belfast**

**BT1 2LB**

**T: 028 9023 0446**

**E: [equality@nifha.org](mailto:equality@nifha.org)**

**W: [www.nifha.org](http://www.nifha.org)**

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## **8. NEXT STEPS**

- 8.1 Trinity Housing will seriously consider all comments received when making a final decision on the recommendations of this EQIA.
- 8.2 The results of the EQIA will be published in the final report, which will be made available to all consultees. Alternative formats will be available on request.
- 8.3 A system will be established to ensure the ongoing monitoring of the impact of the policy on relevant groups.

## Appendix 1: Consultee comments pre-consultation

Organisation	Summary of comments received	Association's response
<b>Age Sector Platform (ASP)</b>	2006 research shows 9.6% of men aged 65+ in employment and 11% of women aged 60+ in employment – would be interested in profile of staff falling into these categories.	Noted
	Emphasis on choice in terms of retirement – talk of pension age being increased and they would not like to see people forced to work longer. Should be a choice and whether the person is still capable of doing the job.	Noted
	Statistics around people over 50 years old – more likely to still be seeking employment after 2 years than those under 50 years old.	Noted
	Consider the panels used in recruitment – consider panel members over 50 years – sends out a message to applicants – even an observing role.	Will be considered
	Do associations monitor appointees and current staff in relation to their age?	Yes
	Consider that as people get older, they may like to wind down and get ready for retirement – can they be considered for flexible working requests (albeit here is no legislation on this but in terms of good practice) by considering reduction in hours/phased working.	Upon request
	Ageing population – living longer, in better health and growing in size. Need to be aware of what they can contribute.	Noted
	Termination of employment – when people leave, particularly retirement – why not have an information pack for them to include details of support or resources which highlights the range of groups out there which seek to encourage active ageing. Could consider this as part of exit interview – try and support staff the way you would do in a redundancy situation.	Noted

Organisation	Summary of comments received	Association's response
<b>Age Sector Platform (ASP)</b>	Could extend use of packs, not just to those retiring, but in the case of people leaving due to ill health or bereavement etc	Already Exists
	"Granny leave" – so many people rely on parents for childcare. Impact on employers.	Noted
<b>Carers NI (CNI)</b>	Availability of flexible working is important for carers	Already Exists
	Access to promotion or other benefits should be the same for those on career breaks or in part-time working – the policy shouldn't depend solely on the manager	Already in place
	The two main blocks to carers taking up promotion are: 1. availability of good reliable care services 2. attitude of 1 <sup>st</sup> line manager (need to be trained, aware, positive)	Noted
<b>Disability Action (DA)</b>	Give consideration to the inclusion of a Textphone number within the list of alternative formats for those with a hearing impairment	Already in place
	DA commented the alternative formats were likely to suffice in terms of covering the needs of those with disabilities / different races however some of the other groups may have suggestions too	Noted
	'Access & Communications' were not covered by this EQIA. DA commented that whilst this was dealt with previously, these issues were cross cutting within employment matters and would therefore need to be considered again in the employment context	Noted
	'Recruitment & Selection' is not covered by this EQIA. Again DA commented that whilst this was dealt with in year 3, Associations should be reviewing the impact of this exercise. In terms of issues raised and follow up action, organisations which identified a under representation of staff with a disability should now be trying to identify if anything has since changed	Noted

Organisation	Summary of comments received	Association's response
<b>Disability Action (DA)</b>	'Training of Board members/HR policies of Joint Management partners etc' is not covered by this EQIA. DA reminded Associations that current disability legislation protected and promoted the rights of disabled people to participate in public life. Urged Associations to think about which EQIA will cover these specific circumstances if it isn't 'HR in employment'	Noted
	Suggested that the Human Rights Act should be included in list of legislative/regulatory requirements	Noted
	On Performance Management, DA suggested Associations need to thinking about the training which they are providing to staff on disability issues during induction and beyond	Staff Training - Ongoing
	Under 'sources of information', DA suggested Associations needed to look at their own monitoring figures and ask the following two questions, 1. Are disabled people applying to our organisation? If not, why not? 2. If disabled people are applying, are they successful in securing employment? If not, why not? DA proposed that the Recruitment & Selection EQIA should have identified the need for collating and reviewing this information. DA suggested that if Associations were still not doing this then now was the time to be taking action to redress this.	Noted
	Recruitment processes can impact on 'in employment' issues e.g. under-representation of disabled people can be made worse by strategies on promoting internally or use of the internal trawl	Noted
	In relation to staff surveys DA urged Associations to think about whether their organisation was a 'safe' organisation in which to declare a disability.	Yes

Organisation	Summary of comments received	Association's response
<b>Disability Action (DA)</b>	Do staff feel comfortable sharing this information or do they fear repercussions for security of employment/career development	Open door policy and confidentiality policy in place
	Suggested merit in regularly asking the question on disability, not only at recruitment stage, but throughout employment as this is an issue which can change from year to year within a staff team.	Noted
	DA suggested staff focus groups could give good feedback on above point and stressed the importance of qualitative as well as quantitative information	Noted
	Following on from this issue of whether people felt safe declaring a disability during employment, DA urged some caution on the figures of complaints. Suggested that no complaints could still signal a problem particularly if the organisational culture meant that staff did not feel that they could raise a complaint or that it would be dealt with appropriately.	Noted
	With regards to using feedback from inspections and accreditation processes for IIP & ISO etc, DA suggested these inspection reports should be reviewed in terms of disability issues raised or recommendations made. Also suggested that associations should review our systems for self assessment, recording actions to be taken and implementing those recommendations.	Noted
	Implementation of. DA reminded Associations that guidance regarding extension of monitoring duties has been out some time and implementation is required to meet the duties under S75.	Already in place
	Suggested Associations contact DA's Human Resources Dept with regards to the specific details of proactive HR policies, procedures and initiatives.	Noted

Organisation	Summary of comments received	Association's response
<b>Disability Action (DA)</b>	DA's suggested measures to mitigate against adverse impact. Included: 1. Use of Supported Employment placements 2. Consideration of special schools when school placements are being considered 3. Use of a welcoming statement where there is an under-representation of disabled people 4. Ensuring disability related hospital appointments/treatment was not recorded as sick leave 5. Updating and evaluation of disability awareness training	Noted
<b>Gingerbread</b>	Would oppose age limits related to applying for flexible working.	Noted
	Concerns about ability of Housing Associations to be flexible in respect of time off during school summer holidays	Flexi time in place
	Concerns re: childcare, i.e. access to it, affordability and quality.	Noted
	Noted it can be more economically viable for a lone parent not to be in employment, particularly if they are getting the minimum wage	Noted
	When in employment, lone parents may have to leave due to financial difficulties and go back on benefits	Noted
	Would like to see Flexible Working/Family Friendly policies	Already in place
	Would like to see Childcare Initiatives (Gingerbread is aware that whilst childcare vouchers are good idea in theory, they are mainly not in practice due to the lack of childcare on the ground)	Noted
	Be sensitive to domestic violence – skill HR people to sign-post if faced with a disclosure (Woman's Aid)	Noted / Staff training requirements
	Be sensitive to employees counselling needs during working hours	Noted
	For performance management – each case to be reviewed on an individual basis, taking account of the person's circumstances	Management procedures already in place

Organisation	Summary of comments received	Association's response
	Ensure employees have access to information on benefit entitlement (lone parents in work are not always fully aware of additional allowances whilst in work)	Noted
	Useful Statistics <ul style="list-style-type: none"> <li>• 25% of families are headed by lone parents</li> <li>• 92,000 lone parent families in N Ireland, incorporating 150,000 children</li> <li>• 90% of lone parents are lone mothers</li> <li>• 56% of lone parents are in work</li> </ul>	Noted
	In the late 90`s government set itself a programme of welfare to work and the target was to have 70% of lone parents in work by 2010. OFMDFM carried out research in respect of how to get a further 14% of lone parents into employment. It was reported that 10,000 jobs would be required and 30,000 childcare places – an impossible target	Noted
<b>Multi-Cultural Resource Centre (MCRC)</b>	The biggest issue for people from another country is often language. Most do not have English; as a result their employment options are limited.	Noted
	Cost of courses may be prohibitive for those in low paid jobs so they cannot improve their language skills which in turn reduces employment / career progression options (e.g. BIFHE course is £106	Noted
	Government needs to offer support by helping people access classes that will enable them to integrate	Noted
<b>Rainbow Project</b>	Review the paternity arrangements to ensure inclusivity. Suggested wording “child in your care”	Noted
	Review the wording in the policy for “maternity” and clarify that it is the main person responsible for providing the childcare	Noted
	Review adoption procedure to ensure inclusive wording	Noted
	Ensure if “marriage” leave is provided it includes Civil Partnerships too.	Noted

Organisation	Summary of comments received	Association's response
<b>Rainbow Project</b>	Issues around allocation of points for housing in intimidation based on sexual orientation	NIHE Responsibility
	Ensure literature is proactive and inclusive language in policies used to promote equality	Already in place
	Consider specialised training in issues faced by those of different sexual orientation	Staff training requirements
	Look at monitoring key stakeholders in terms of sexual orientation	Noted
	Review Harassment procedure and ensure specific reference is made to "Hate Crimes"	Noted
	Recommendation to draft a Policy for Domestic Violence and include all relationships in this.	Noted
	Ensure Harassment procedures refer to harassment incidents outside the workplace at social gatherings	Noted
	Consider speaking to Lesbian and Gay Older Peoples Network to assess any issues across two of the 9 groups.	Noted
<b>Women's Support Network (WSN)</b>	Suggested promotion flexible working to the male workforce as traditionally women take up most requests.	Noted
	Access to childcare is a big issue for working mothers – no childcare strategy/infrastructure in place.	Noted
	Women may put off having children because of a fear of how it will affect their career, but later encounter fertility issues.	Noted
	Transport infrastructure does not always enable women to manage childcare/work.	Noted
	Future Government changes may force mothers off income support and into work when their children reach 12 years old. Impact of this for women – need retraining and / or re-education as well as somewhere for their children to go.	Noted
	Employers for childcare – voucher scheme to assist parents in work with childcare.	Noted

Organisation	Summary of comments received	Association's response
<b>Women's Support Network</b>	Employers for childcare have also been instrumental in helping employers start up crèche facilities – may wish to consider this as an umbrella group.	Noted
	"gender segregation" within the workplace - where there still might be jobs, particularly lower paid, that would be predominantly female, with no obvious route for progression; suggested that employers should perhaps target these groups with their training programme to provide a chance for development that would allow them to move away from these roles into others with more chance for progression.	Staff training requirements

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## Appendix 2 – Equality Consultation List

Revised July 2009

Age Concern Northern Ireland
Age Sector Platform
Alliance Party for Northern Ireland
Amalgamated Engineering & Electrical Union
Amalgamated Transport & General Workers Union
An Munia Tober
Antrim Borough Council
Ards Borough Council
Armagh District Council
Association of Independent Advice Centres
Bahai Council for Northern Ireland
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Barnardos
Belfast City Council
Belfast Health & Social Services Board
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Trade Unions Council
Brainwaves Northern Ireland
British Deaf Association (NI)
Carafriend
Carers Northern Ireland
Carrickfergus Borough Council
Castlereagh Borough Council
Central Services Agency
Chartered Institute of Housing
Child Poverty Action Group (NI)
Children's Law Centre
Chinese Welfare Association
Citizens Advice Regional Office (Belfast)
CO3 Chief Officers Third Sector
Coalition on Sexual Orientation (CoSO)
Coleraine Borough Council
Committee on the Administration of Justice (CAJ)
Community Development & Health Network (NI)
Community Relations Council (CRC)
Cookstown District Council
Council for the Homeless (NI)
Craigavon Borough Council
Democratic Unionist Party
Department for Social Development
Derry City Council
Derry Well Woman

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Disability Action, Belfast
Disability Action, Derry
Down District Council
Down's Syndrome Association
Dungannon & South Tyrone District Council
East Belfast Community Development Agency
Eastern Health & Social Services Board
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh District Council
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Help the Aged Northern Ireland
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Larne Borough Council
Lesbian Line
Limavady District Council
Lisburn Borough Council
Magherafelt District Council
Magherafelt Women's Group
MENCAP
Methodist Church in Ireland
Mind Yourself
Moyle District Council
Multi-Cultural Resource Centre
Newtownabbey Borough Council
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
North Down Borough Council
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Care Trust
Northern Health & Social Services Board
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health
Northern Ireland Committee for Refugees & Asylum Seekers (NICRAS)
Northern Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Housing Council
Northern Ireland Housing Executive
Northern Ireland Human Rights Commission (NIHRC)

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Northern Ireland Mixed Marriage Association
Northern Ireland Office
Northern Ireland Women's Aid Federation
Northern Ireland Women's European Platform (NIWEP)
Northern Ireland Youth Forum
NUS USI
Office of the First Minister & Deputy First Minister
Omagh District Council
Omagh Women's Area Network
Parents & Professionals & Autism
POBAL
Polish Welfare Association
PRAXIS
Press for Change
Probation Board for Northern Ireland
Progressive Unionist Party
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
SEEDS
Sense NI
Simon Community
Sinn Fein
Social Democratic & Labour Party
Southern Health & Social Care Trust
Southern Health & Social Services Board
Staff Commission for Education & Library Boards
Strabane District Council
Supporting Communities NI
The Cedar Foundation
The Guide Dogs for the Blind Association
The Rainbow Project
The Women's Centre
Traveller Movement Northern Ireland
UCATT
Ulster Democratic Party
Ulster Scots Heritage Council
Ulster Unionist Party
Western Health & Social Care Trust
Western Health & Social Services Board
Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency (WRDA)
Women's Support Network
Workers Party
Youth Action
Youth Council for NI

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