



## **DISABILITY ACTION PLAN 2021 - 2026**

**English:** This Disability Action Plan can be made available in minority ethnic languages, on request, to meet the needs of those not fluent in English.

The document can also be made available, on request in other formats including:

- Large font
- Audiocassette
- Braille
- Computer Disc

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# DISABILITY ACTION PLAN

## Clanmil Housing Group

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## 1. INTRODUCTION

Under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), Clanmil Housing Group are required when carrying out its functions to have due regard to the need to:

- promote positive attitudes towards disabled people; and
- encourage participation by disabled people in public life ('the disability duties').

Under Section 49B of the DDA 1995, Clanmil Housing Group are also required to submit to the Equality Commission a **disability action plan** showing how it proposes to fulfill these duties in relation to its functions.

## 2. COMMITMENTS

As Group Chair and Group Chief Executive of Clanmil Housing Group, we are committed to implementing effectively the disability duties and this disability action plan. We will allocate appropriate resources (in terms of people, time and money) in order to implement effectively this plan and where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.

We will also put appropriate internal arrangements in place to ensure that the disability duties are complied with and this disability action plan effectively implemented. We will ensure the effective communication of the plan to staff and to providing all necessary training and guidance for staff on the disability duties and the implementation of the plan. We will promote the plan to all levels of staff throughout the organization and will clearly demonstrate for them their responsibilities under the Disability Action Plan.

The Group Director of Corporate Services, Karen Gilmore, will have operational responsibility for ensuring the implementation and monitoring of the plan. Annual Progress Reports will be provided through the normal reporting structures.

As part of the operational planning process, Clanmil Housing Group will build objectives and targets relating to the disability duties into the operational plans of each department. Progress on meeting objectives will be considered by the Executive Team of Clanmil Housing Group and will be reported to the Board of Management at each Board meeting under the equality agenda.

### 3. FUNCTIONS

Clanmil Housing Group is one of the largest independent Housing Associations in Northern Ireland. The high-quality homes, care and support services we provide help meet the diverse needs of a wide range of customers including; older people, families, mature singles and people with complex needs. Outlined below are the range of functions of Clanmil Housing Group:

- Clanmil Housing Group are a charitable housing association registered with the Department for Communities (DfC). It is a voluntary non-profit making organization.
- Responsibility for strategic management of Clanmil lies with the Voluntary Board of Management. Day to day management of the Clanmil Housing Group is delegated to the Group Chief Executive and the senior management team of five departments. The disability plan monitoring comes under the management of the Group Director of Corporate Services.
- The Head Office of Clanmil Housing Group is in Belfast, and there are regional offices in the North West and in Mid Ulster.
- We have over 5000 units in Northern Ireland. Our housing stock is made up of sheltered accommodation, 3 residential care homes, general family housing and supported housing schemes for people with learning disabilities, dementia, chronic mental health problems, physical disabilities, Irish Travellers and housing for older people.

Main activity areas include :-

- Allocation of Housing
- Estate Management
- Tenant Participation
- Rent collection, arrears and voids

- Community Consultation and development
- Purchase and disposal of land and property
- House Sales
- Employment
- Finance
- Supporting People
- Maintenance
- Procurement
- Complaints
- Health, and safety

#### 4. PUBLIC LIFE POSITIONS

The range of public life positions over which Clanmil Housing Group have responsibility for, are as follows:-

- *Board Members and Members of Committees*
- *Tenant Forum*

The Association is aware that there is currently an under-representation of disabled people in public life positions.

#### 5. MEASURES ACHIEVED

Under the Disability Discrimination Act 1995, the Group have undertaken a number of previous measures to promote positive attitudes towards disabled people and to encourage their participation in public life. The Group works closely with people with disabilities as well as disability advocacy groups. Already there are many examples of imaginative good practice in existence, as outlined below:

- Provision of supported housing which uses assistive technology and support services to enable tenants to remain in their homes.
- Carry out adaptation works and assistive technology to existing properties to compensate for disability.
- Disability Awareness and equality issues included in staff inductions with mandatory equality training for all staff carried out

within their first year of joining. This also includes the availability of online training for staff with a disability.

- Joint working with partner organizations delivering specialist services to people with disabilities including Health and Social Care Trusts and voluntary agencies including Action Mental Health, and An Munia Tober.
- Reasonable adjustments made for staff / tenants as necessary.
- Equipment available to readily facilitate participation by disabled people i.e. loop system for meetings, textphone in Northern Whig House, purchase of IT equipment to assist staff member who has a registered disability etc.
- Development of screening procedure to assess disability issues in relation to S75 duties including requests for statistical information in relation to stakeholders with disabilities in internal surveys.
- DDA audits carried out and plan of action agreed by the Executive team.

The Group also encourages the participation of disabled people in public life, as outlined below:

- Workplace policies
- Policy screening
- Working with Disability organisations to carry out training for all staff
- Corporate Inductions
- Recruitment & Selection training

## **6. HOW THE PLAN WILL BE PUBLISHED**

When the Plan is submitted to the Equality Commission for Northern Ireland it will be placed on the Group's website and will be available on request from Bernadette O'Donnell, HR Business Partner at the contact details listed on page 2.

The Plan will be produced in clear print and plain language and will be available in alternative formats, including large print, Braille, Easy-read, audio cassette and computer disc on request.

The Group will consult directly with disability organisations and representative groups on the Plan.

The Group will consult directly with the Equality Commission for Northern Ireland on this publication.

## **7. PROPOSED MEASURES**

The actions that the Group intends to take in this plan are outlined in Appendix A. These actions were developed from the ongoing engagement with disabled people and representative groups with all Housing Associations. Their generosity in making their time, expertise and experience available to us is very much appreciated.

## **8. GUIDING PRINCIPLES ON IMPLEMENTATION OF THE PLAN**

All actions detailed below will be discussed, developed and delivered in collaboration with people with disabilities and disability advocacy groups.

When working with disabled people we are committed to making the necessary changes in how we conduct our meetings to ensure meaningful participation by all involved.

The Group will recognise and take into account the varying needs of people with different disabilities. Clanmil Housing Group will also address the needs of people with multiple identities, such as ethnic minority women with disabilities, children and elderly people with disabilities etc. and will take account of these in the implementation of the following Plan.



The Group recognises the benefits of working in partnership with a range of other organisations in the implementation of this Plan.

We are committed to working in partnership with the disability sector in the implementation and review of the Disability Action Plan.

## 9. FIVE YEAR REVIEW OF PREVIOUS PLAN

Much work has been completed since Clanmil Housing Group published their last Disability Action Plan in 2016. The Group have carried out a five-year review of its plan and the table below details the key achievements during the lifespan of the previous plan. The table below details the completed actions and outcomes in each of those key areas.

ACTION MEASURE	RESPONSIBILITY	IMPACT
Undertook a review of forms of communication used by the Group by carrying out tenant profiling to ensure we reach our tenants with registered disabilities. Tenant information compiled from NICORE stats.	Housing Management	Ensure maximum inclusivity for our tenants who have registered disabilities so they are kept informed on all processes and services carried out by the Association
Continued to work with NI Housing Executive in the development of our property database	Development	Worked with NIHE to identify applicants early in the design process to provide homes for those with bespoke disability adaptation needs.
Consulted with local communities and political representatives to promote positive	Development	Community consultation events carried out for all new schemes in development to

attitudes regarding housing		encourage interaction with the wider community prior to new tenants moving into their new homes. 52 events were carried out.
<p>Worked with other organisations who seek to promote positive attitudes towards disabled people e.g. RNIB, Action Mental Health, MACS etc and</p> <p>Promoted use of employment support programmes such as Workable NI</p>	Corporate Services	<p>Promotion of positive attitudes towards disabled people</p> <p>Supported colleagues with mental health related conditions to access and remain in employment.</p>
Reviewed our internal policies e.g. Managing Attendance Policy	Corporate Services	Updated to reflect what measures the Association can take to assist a person with a disability to carry out their job functions e.g. what reasonable adjustments can be made to assist a disabled person during their employment
Worked with Occupational Therapists in relation to requests for	Assets	Worked with OT regarding requests for adaptations to assist disabled

adaptations to existing homes		tenants to remain in their homes. In the 5 years of the previous Disability Action Plan we carried out 951 adaptations to our existing homes.
Carried out training for all staff at all levels on Equality & Diversity	Corporate Services	<p>Ensured that all staff completed the online Equality &amp; Diversity training. During this 5 year plan there were 183 attended Equality &amp; Diversity related training events carried out.</p> <p>Trained 10 staff members on JAM card initiative through NOW Group and were recognized as a JAM card friendly organisation.</p> <p>Trained 7 staff members to become internal Mental Health First Aiders to be a first point of contact for those living with a mental ill health condition.</p>
Set up a dedicated Safeguarding Team	Housing Management/Corporate Services	To help and safeguard adults with care and support needs and ensure

		safeguarding arrangements are in place for vulnerable residents including those with disabilities.
The HR Business Partner provided Clanmil Board with copies of our Annual Progress Report under our annual Equality Scheme reporting duties	Corporate Services	Published an annual progress report to the Board in respect of disability & equality.
Explored options for improving access to information using social media	Marketing & Communications	<p>Developed Twitter and Facebook accounts to improve access to information using social media to engage with stakeholders.</p> <p>Ensured our external website is fully accessible and in a suitable format for access by those with a disability.</p> <p>Set up a chat function on our website for money and benefits advice.</p>
Internal Processes and Awards	Corporate	Won a prestigious local award for Best Employer for Equality & Diversity

		in NI – Large Company at the Legal Island Gala Awards in 2018
Carried out surveys with customers to allow for a review of findings by disability	Housing Management	Tenant surveys were carried out with all tenants to identify those with a disability and provide support on areas of social housing including money and benefits advice and advise on the impact of Welfare Reform Act
Monitored number of customer complaints in relation to access to information on services.	Business Assurance	There were 6 complaints received and closed down.
Established mechanisms for involving external organisations in discussing the equality dimension of the Associations business (to include disability groups)	Corporate Services	<p>Published screening reports outlining all policies, programmes and processes that Clanmil have equality assured.</p> <p>Increased engagement with representative groups within the disability sector and reviewed recommendations / feedback when given</p>

Carried out awareness raising of specific barriers by people with disabilities including through linking in with National Awareness Days or Weeks	Corporate Services	Increased awareness of a range of disabilities
Encouraged staff to declare that they have a disability to ensure that we have more accurate data in place	Corporate Services	Supported through our Annual Declaration process to increase the completion of disability monitoring information
Reviewed and revised our Children's Play Area policy	Corporate Services	Updated policy to include consideration for future play areas to be designed to be accessible for all
Reviewed and drafted a policy regarding the use of mobility scooters in our sheltered housing schemes	Housing Management	An audit was carried out regarding adaptations required in our sheltered schemes to allow for the storage and safety of mobility scooters in our schemes. The audit was developed alongside people who live in our homes.
Created a Service Improvement panel	Marketing & Communications/Housing	Established to find out from the people

for stakeholder publications and communications called “The Big Conversation”	Management	who live in our homes how we can best engage with them, how we can improve delivery of services to them and for our tenants to get their voice heard and be listened to about the services that matter to them. 488 tenants got involved.
Services provided during COVID pandemic	<p>Housing Management</p> <p>Corporate Services</p>	<p>During March 2020 – 2021, during the lockdown due to COVID we saw an increase of 57% of our tenants accessing money advice with our team supporting 712 people. We also assisted our 23,678 of our tenants to access support contacts, made 189 food referrals and signposted 147 people to prescription delivery services and increased phone calls and contact with our more vulnerable tenants.</p> <p>We communicated to all staff by</p>

		issuing weekly FAQs, Line Managers had more frequent check ins with all staff, shielded staff where needed and provided advice on well-being and mental health assistance.
Advert for Board Recruitment to encourage those with a disability to take up public life positions	Corporate Services	Recently advertised for 2 Non-Executive Board Members through a Recruitment Consultancy Firm

## 10. ACTION MEASURES

Clanmil Housing Group will continue to actively undertake a number of measures to promote positive attitudes towards disabled people and assist them in participating in public life through its work in connection with Section 75. Examples include:

- Partnership working arrangements with other Housing Associations
- Continue to provide disabled adaptations to tenants who have disabilities
- Continue to develop new schemes incorporating homes designed to Lifetime Home standard and specific accommodation for people with disabilities.
- Encourage disabled tenants to become involved in tenant associations



- Review all policies to identify and assess any significant issues relating to the two disability duties
- Include disability awareness in staff inductions
- Include people with a disability in review of policies
- Continue to engage with organisations and disabled people to promote positive attitudes towards disabled people and encourage participation by disabled people in Public life
- Continue to utilize the corporate twitter account to highlight events carried out to promote and raise awareness of our work with disabled people

The Group will continue to report progress made against these action measures to the Equality Commission in our Annual Progress Reports.

## **11. TIMESCALE FOR IMPLEMENTATION OF THE ACTION MEASURES AND PERFORMANCE INDICATORS / TARGETS**

Clanmil Housing Group is aware of the need to monitor progress in relation to the implementation of the Disability Action Plan to ensure that the disability duties are being met. An annual review of the plan will go some way towards monitoring and review and will help in the developing targets and Key Performance Indicators for the next year whilst detailing any significant outcomes relevant to the review period.

Outlined below are some of the performance indicators that could be implemented to assess progress in relation to the implementation of the two disability duties.

- Employee and Customer surveys to identify training needs around the disability duties
- Provide training to new staff on disability awareness as part of inductions within the first 3 months of employment
- Review all policies where an adverse impact on those with disabilities have been identified

- Information circulated to tenants asking for comments in communications sent out by the Association.

## **12. CONSULTATION PROCESS AND PUBLICATION**

Clanmil Housing Group is committed to carrying out meaningful consultation on the development of the Disability Action Plan and subsequently on the fulfillment of the two disability duties.

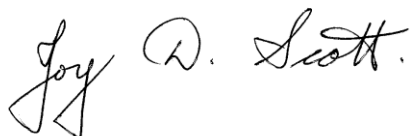
The Group will endeavor to obtain the views of disabled people and other bodies working with disabled people on issues around participation and involvement as well as developing ways to obviously and discreetly promote positive attitudes towards disabled people.

To this end it is the Groups intention to:

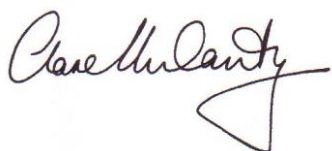
- Identify barriers faced by disabled people in participation in public life in general and specifically any barriers they have encountered in relation to their dealings with the Association.
- Identify circumstances in the past where the Association has not promoted positive attitudes towards disabled people and also identify opportunities to promote positive attitudes in future.
- Set priorities and in time monitor and review the effectiveness of measures taken.
- Consult with our tenants who do have a disability on the services we provide;
- Advertise to all our tenants through our tenants' newsletter on the development of this plan;
- Inform all staff through the staff newsletter on the development of this plan; and
- Be proactive in contacting representative organisations of disability groups for their feedback on this plan.

The consultation document will be made available on the Groups web site for views of individuals and organisations who visit the site.

Signed by:

A handwritten signature in black ink that reads "Joy D. Scott." The signature is written in a cursive style with a large, stylized 'J'.

Joy Scott  
Group Chair

A handwritten signature in black ink that reads "Clare McCarty". The signature is written in a cursive style with a large, stylized 'C'.

Clare McCarty  
Group Chief Executive

## APPENDIX 1

### MEASURES TO BE TAKEN TO IMPLEMENT DISABILITY DUTIES

ACTION MEASURES	PERFORMANCE INDICATORS / TARGETS	RESPONSIBILITY	TIMESCALE
Promote positive attitudes towards disabled people in the Group	Number of staff who have completed mandatory equality training.	Corporate Services	Annually
	Update the Groups staff Induction package to ensure it informs staff on the disability duties and the Group's Disability Action Plan.	Corporate Services	December 2021
	Staff to be informed on disability awareness days through our internal intranet site.	Corporate Services	Ongoing
	Survey all staff, in conjunction with Public Health Agency, to identify challenges in the workplace, raise awareness, promote and provide support around mental well-ness.	Corporate Services	April 2021

ACTION MEASURES	PERFORMANCE INDICATORS / TARGETS	RESPONSIBILITY	TIMESCALE
	Introduce a new Well-being Policy to all staff and carry out a number of events throughout the year to highlight and celebrate key health awareness and disability related dates.	Corporate Services	April 2021
	Review corporate documentation (both internal and external) containing positive and proportionate reference to people with a disability.	Corporate Services	Ongoing
The Group will review ways of making information on services more accessible	Seek training/guidance on best practice	Corporate Services	Ongoing
Develop staff protocol to allow staff to respond in an effective and efficient manner to accessibility queries from customers	Review and update policies and procedures to ensure reflect best practice	Corporate Services	3 yearly
Information/publications	Updated Annual Report circulated to staff and disability consultees	Marketing & Communications	Annually
	Update and review Groups website to ensure it complies with best practice with regard to	Marketing & Communications	Annually

ACTION MEASURES	PERFORMANCE INDICATORS/TARGETS	RESPONSIBILITY	TIMESCALE
	accessibility.		
	All information will, where possible, be made available in other formats on request including braille, audio formats, large print etc and within a timely fashion.	Corporate Services	Ongoing
	Launch a dedicated Tenant Portal on our website to make contacting the business more accessible to those with and without disabilities	Marketing/ICT	January 2022
	Monitor number of customer complaints in relation to access to information on services.	Business Assurance Team	Ongoing
Encourage more disabled people to apply for public appointments.	Monitor numbers of disabled people applying for and appointed to Public Life appointments.	Corporate Services	Ongoing
Increase awareness of the Disability Duties and disability legislation of those who hold a public life position.	Encourage and deliver training on disability legislation and disability duties awareness to those in public life positions	Corporate Services	Ongoing

ACTION MEASURES	PERFORMANCE INDICATORS/TARGETS	RESPONSIBILITY	TIMESCALE
Maintain accurate records on the disability status of staff to monitor employment procedures	Continue to monitor applicants and staff to collate and analyse results.	Corporate Services	Ongoing
	Continue to carry out mandatory pre-employment medical checks as part of recruitment clearance process	Corporate Services	Ongoing
Consider creating meaningful placement opportunities for people with disabilities (work placements / shadowing)	Continue monitoring numbers and percentage of applicants at each stage of internal and external recruitment and selection by disability, to identify priorities for action	Corporate Services	Ongoing
Identify, provide and promote opportunities for more engagement for people with a disability in key work areas	Re-establish, promote and market a staff forum for representatives from each department to engage in all areas of work including disability	Corporate Services	September 2021
Continue monitoring the numbers of staff in post to identify priorities for action	Carry out annual exercises to encourage staff to declare disabilities/long term health conditions and ensure consideration is given to the implementation of all identified reasonable adjustments	Corporate Services	Annually (Nov)

<b>ACTION MEASURES</b>	<b>PERFORMANCE INDICATORS/TARGETS</b>	<b>RESPONSIBILITY</b>	<b>TIMESCALE</b>
Continue to carry out surveys with customers to allow for a review of findings by disability	Tenant Surveys to be carried out with all tenants to identify those with a disability and provide support on areas of social housing and advice on impact of any changes to the Welfare Reform Act.	Housing Management	Annually
Enhance opportunities for more Tenant Engagement	A Tenant Engagement Structure has been developed across the business to involve tenants on making a difference, influencing change and improving the service for all tenants and improve satisfaction levels.	Housing Management	2021 onwards
Provide a number of solutions to specific access requests	Provide sign language interpretation at external events and face-to-face meetings to talk through the content of our application materials.	Corporate Services	Ongoing
Establish mechanisms for involving external organisations in discussing the equality dimension of the Associations business (to include disability groups).	Publish screening reports, outlining all policies, programmes and processes that Clanmil have equality assured  Report findings on screening in Annual Report to ECNI	All departments  Corporate Services	Quarterly  By 31 <sup>st</sup> August each year



ACTION MEASURES	PERFORMANCE INDICATORS/TARGETS	RESPONSIBILITY	TIMESCALE
Carry out adaptation requests as requested by Occupational Therapists and continue to work with NIHE to pre-allocate Design & Build properties for those with disabilities.	Adaptations are carried out as requested, where funding is available from NIHE	Assets	Ongoing
	Work with partners regarding pre-allocation where we can whilst we	Development	Ongoing
Lobby NI Housing Executive and local political representatives to retain Supporting People (SP) funding to secure the continued protection of vulnerable adults by keeping SP as a properly funded, dedicated housing support programme.	Continue to work alongside NIFHA, Council for the Homeless NI & other voluntary and charitable agencies to strengthen the Supporting People (SP) programme that provides support to our tenants including those living with a disability	Housing Management	Ongoing
Continue to provide a range of service models to enable older people to maintain/sustain independence in the tenure of their choice	Revise current care plans for tenants living in our independent living schemes and residential care homes to ensure they are tied up with tenants specific needs	Housing Management	Ongoing
Continue to develop on joined up services with community care sector for older people with mental health issues /dementia	Examine alternative housing support service models for extending the community based approach	Development	Ongoing

ACTION MEASURES	PERFORMANCE INDICATORS / TARGETS	RESPONSIBILITY	TIMESCALE
	Attempt to identify development opportunities for new accommodation based services for older people with dementia and mental health issues	Development	Ongoing
Seek the views of staff and service users on the content and implementation of the Disability Action Plan and disability equality generally.	Identify opportunities with internal staff to gauge knowledge and encourage staff with a disability to submit articles to in-house magazines, newsletters etc to make others aware of how their disability affects them day to day	Corporate Services	Ongoing
Ensure that key staff are competent in using text phones and ensure all reception staff have access to service	All reception staff are able to communicate effectively with all stakeholders who visit reception during office opening hours	Corporate Services	Ongoing
Provide health and wellbeing awareness training for staff	All staff to be offered the opportunity to attend training on any area of health and well-being e.g. stress awareness, bereavement, suicide awareness etc	Corporate Services	Ongoing
Provide advice to all managers in managing stress and mental health issues	Ongoing monitoring of sickness absence procedures, continuing provision of occupational health	Corporate Services	Ongoing

ACTION MEASURES	PERFORMANCE INDICATORS / TARGETS	RESPONSIBILITY	TIMESCALE
	appointments and advice on contact with staff who have identified areas of stress in and outside the workplace		
Develop and communicate a protocol to assist managers to support their team members	Organise bespoke training for Line Managers to assist with supporting team members with specific health/disability related conditions	Corporate Services	Annually
Ensure people with a disability have full access to training and development opportunities	Consideration to be given to access to buildings, interpreters at training events etc to assist any staff member with a disability to attend all training sessions	Corporate Services	Ongoing
ECNI Mental Health Charter	We will sign up to, adopt and implement the principals contained within the Mental Health Charter and associated workplans developed by the consortium of mental health organisations and the Equality Commission for Northern Ireland	Corporate Services	December 2021