



Clanmil Housing Association

**HUMAN RESOURCES
Recruitment and Selection**

Equality Impact Assessment

Final Report

December 2008

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Karen Gilmore
Clanmil Housing Association
Northern Whig House
3 Waring Street
BELFAST
BT1 2DX

Tel:	}	02890 876000
Fax:	}	02890 876001
Text Phone	}	02890 329914
Email:	}	karen.gilmore@clanmil.org.uk
Website:	}	www.clanmil.org

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1. EXECUTIVE SUMMARY

- 1.1 Clanmil Housing Association 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. Clanmil Housing Association 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 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 HR recruitment and Selection policy is:

To identify a suitable pool of candidates to meet the needs of the business (whilst operating within available resources).

This report provides the following information:

- Background information on the equality duties and Clanmil Housing Association
- A description of the Association's current HR Recruitment and Selection policy
- 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. This includes potential differential impacts based on disability and race
- Proposed mitigating measures
- Details on the consultation process
- The next stages of the EQIA.

2. INTRODUCTION

Statutory Equality Duties

2.1 Section 75 of the Northern Ireland Act requires Clanmil Housing Association, 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 Karen Gilmore (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. The HR Recruitment and Selection policy was scheduled for assessment in year three of this programme.

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 Clanmil Housing Association

Clanmil Housing Association is a charitable Housing Association registered with the Department of Social Development. It is a voluntary non-profit making organisation.

Over the years we have developed an expertise in both building and managing housing for older people, people with disabilities and special needs. We also have experience of providing care directly and in partnership. Today we are involved in the development and management of affordable housing all over Ireland for anyone in housing need.

Our housing stock is made up of sheltered accommodation, 3 residential care homes, specialised housing units and general family

housing. We have over 1967 units throughout Northern Ireland and over 170 staff.

In our mission statement we “aim to be a primary provider of high quality homes at the lowest possible economic rent for everyone in housing need”. We were accredited ISO 9001:2000 in 1995, and the Investor in People Award in 2005.

3. THE POLICY

Description of Policy

The HR Recruitment and Selection policy describes the Recruitment and Selection service the Association provides to its tenants and wider community.

Policy Aim

3.1 The aim of the HR Recruitment and Selection Policy is:

To identify a suitable pool of candidates to meet the needs of the business whilst operating within available resources

The scope of the HR Recruitment and Selection activities covered in the policy include:

- Job analysis –The process of identifying the need for a post
- Job Description and Person specification –assessing the requirements and competencies required for the post
- Advertising –The use of appropriate advertising methods and media when recruiting
- Selection process – Panel composition, shortlisting, interview procedures and/or testing
- Monitoring - To comply with legal obligations in relation to collecting relevant statistical information on our applicants for employment.
- Vetting and checking – This covers reference checks, POCVA/ AccessNI checks, medical checks, Permit to Work, Social Care Council, Qualification checks and relevant external bodies, where appropriate

Underpinning objectives include:

- Compliance with legislation, statutory codes of practice and internal policies
- Consistency of treatment
- Provision of equal access to the process
- Having the reputation as a fair and equitable employer
- Meeting the resource needs of the business
- Providing a quality service to a range of stakeholders

Scope of Review

3.2 The main stakeholders include anyone seeking access to the Association's HR Recruitment and Selection service or any other stakeholder of the Association. This can be any of the following:

External

- Applicants for employment and potential recruits
- Equality Commission
- Tenants and Residents
- Legislative Bodies
- Department for Social Development (DSD)
- Elected representatives
- General public
- Inspection and assessment bodies
- Other Housing Associations
- Other statutory agencies
- Trade Union Representatives
- Northern Ireland Housing Executive (NIHE)
- Partners or providers of Housing Support Services
- S75 representative groups
- Suppliers/Consultancy Services
- Access NI
- Recruitment Agencies

Internal

- Board members
- Management
- Staff

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 Recruitment and Selection.

Inspection and Assessment bodies

There are also other organisations that may be involved in aspects of the Association's Recruitment and Selection service.

- Labour Relations Agency

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- Quality Improvement Authority
 - Industrial Tribunals Office
 - Equality Commission

Ombudsman

Anyone dissatisfied with the way in which the Association carries out its Recruitment and Selection service (after having exhausted the Association's Complaints Procedure) can make a complaint directly to the Ombudsman for an independent review.

Other Third Parties

There may be occasions to involve third parties when reviewing the Association's Recruitment and Selection policy.

The lists shown under 3.2 are not exhaustive.

What this EQIA does not cover

3.3 We anticipate that some aspects of Recruitment and Selection 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.
- Complaints about HR Recruitment and Selection – This was covered by the Year 1 EQIA on Complaints
- The policies and procedures during employment – this will be covered in the EQIA in Year 4.
- The recruitment of Board Members
- The specific recruitment and selection policies of joint management partners and recruitment agencies

3.4 The Recruitment and Selection policy is 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 Recruitment and Selection service provision:

- The Equal Pay Act (NI) 1970
- Employment Rights (NI) Order 1996
- The Sex Discrimination (NI) Order 1976
- The Disability Discrimination Act 1995
- Employment Rights (NI) Order 1996
- The Race Relations (NI) Order 1997
- The Fair Employment and Treatment (NI) Order 1998
- Section 75 of the Northern Ireland Act 1998
- The Employment Equality (Sexual Orientation) Regulations (NI) 2003
- The Civil Partnership Act 2004
- The Equal Pay (Amendment) Regulations (NI) 2004
- The Employment Equality (Sex Discrimination) Regulations (NI) 2005
- The Disability Discrimination (NI) Order 2006
- The Employment Equality (Age) Regulations (NI) 2006
- Safeguarding Vulnerable Groups (NI) Order 2007
- The Rehabilitation of Offenders (NI) Order 1978
- Part V Police Act

This list is not exhaustive.

3.6 In addition to Recruitment and Selection generally, Clanmil 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 Recruitment and Selection 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) Clanmil believes that access to services, including HR Recruitment and Selection, is of high importance to S75 groups.

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- (c) Clanmil also believes that its HR Recruitment and Selection policy merited an equality impact assessment to demonstrate its commitment to providing an efficient and effective service to its tenants. The Association provides services to a diverse range of customers including many client groups with special needs.
 - (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.

Implementation of the policy

- 3.8 The Recruitment and Selection policy has been defined by the Association's Board management team. It is implemented by all relevant staff in the Association.

Standards

- 3.9 HR Recruitment and Selection Policy documents are agreed by Clanmil Board and Senior Management Team, and in compliance with any legal requirement.
- 3.10 Clanmil Housing Association carries out the process of recruitment and selection in accordance with the Statutory Codes of Practice, including those set out by the Equality Commission and the Labour Relations Agency.

3.11 Job analysis

Jobs are planned through annual resource planning, staffing budgets, turnover of staff, natural wastage or on a project basis or as a possible outcome of a flexible working request.

3.12 Job Description and Person Specification

Job descriptions and person specifications are reviewed and if necessary, updated for all vacancies, as required. Skills and abilities are determined by the requirements of the post.

Consideration will be given to the relevance of criteria required and account will be taken of equivalent standards.

3.13 Advertising

All posts will be advertised dependant on the nature of the post and the circumstances of the job.

Consideration will be given at all times to accessibility of advertising methods for the widest pool of applicants. This will include screening adverts for negative or discriminatory language or imagery.

3.14 Selection process

This will include panel composition, shortlisting, interview procedures and/or testing.

Where available, panels will be constituted with due regard to a representative panel for recruitment exercises. The same panel will be used throughout the recruitment process.

Every effort will be made to facilitate attendance at the interview for applicants.

Tests applied during the recruitment process for certain posts will be screened to ensure they are relevant to the job and criteria required for the post.

3.15 Monitoring of recruitment and selection process

This refers to the monitoring of employees.

All registered employers must monitor their workforce by community or background, by gender, by Standard Occupational Classification, applicants, appointees, promotees and job leavers.

Applicants, appointees, promotees and job leavers will complete monitoring returns and this will form the basis of the annual monitoring return to the Equality Commission.

A more in depth monitoring exercise is carried out three yearly in line with the Article 55 requirements for the Equality Commission.

3.16 Vetting and checking

This procedure covers reference checks, POCVA checks, medical checks, Permit to Work, Qualification checks, AccessNI Criminal

record checks and relevant external bodies, where appropriate. References and Medical clearance will be taken for all posts.

All applicants for designated posts will be referred to the relevant statutory bodies, which may include criminal record checks (Access NI) POCVA checks (AccessNI), Regulation and Improvement Checks, Northern Ireland Social Care Council Checks, Home Office checks, Nursing and Midwifery Council and qualification equivalencies checks.

There are specific procedures for each vetting and checking process. These are largely determined by other statutory agencies or specific insurance requirements.

Clanmil also verify any gaps in employment, self employment, benefits claims or periods of study / travel.

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 Recruitment and Selection policy:
- a) Pre-consultation research commissioned by NIFHA and undertaken by IMS Consultants during March – April 2008
 - b) Internal data collection events held as part of the joint exercise co-ordinated by NIFHA
 - c) The Association's internal management information on the profile of applicants and /or job leavers
 - d) Data collected for the Annual Regulatory Return to the DSD
 - e) 2001 Northern Ireland Census Data
 - f) Office for National Statistics
 - g) Northern Ireland Research and Statistics Agency data
 - h) Data from the 2006 Life and Times Survey
 - i) Data from benchmarking exercises
 - j) Qualitative Feedback from Recruitment and Selection staff
 - k) Complaints and Compliments register
 - l) Grievances about Clanmil's Recruitment and Selection process
 - m) Internal and External audits
 - n) Responses received in relation to Associations original Equality Scheme Consultation
 - o) CIPD research / other benchmarking surveys and research

- p) Internal exit interview process with staff
- q) Equality Commission for Northern Ireland – Statement on Key Inequalities in Northern Ireland produced 2008.
- r) Staff Attitude surveys which include equality questions

The key issues highlighted by analysis of the above data sources are presented in this section.

IMS Pre-consultation Survey

- 4.2 A Report from IMS Consultants, prepared for NIFHA, providing consultation feedback on the impact of Recruitment & Selection policies dated April 2008 highlighted various issues that may affect the groups within the Section 75 categories. A full report, which includes responses from the ECG, is available at Appendix B. The issues raised in relation to the respective S75 groups are detailed below.
- 4.3 Housing Associations held two meetings during November 2007 where a range of staff took an assessment of the impact of both the Care and Support and Human Resources – recruitment and selection policies.

The feedback collected at those events has also been taken into account when considering the impact of these policies.

The table below summarise the outcome of the work detailed at 4.2 and 4.3.

Key issues highlighted for each of the nine Section 75 categories.

S75 Category	Source of data	Issues highlighted
Age	IMS pre-consultation survey	Consultees considered there was a general bias against employing older people Consultees highlighted the fact that specifying timed experience can exclude some younger people
	Housing association meetings in Nov 2007	Legislation may require a person to be over 18 or 21 for certain jobs. Insurance (e.g. for drivers) may be difficult to get at certain ages which would restrict the employer's options
Dependents	IMS pre-consultation survey	No issues were cited by consultees
	Housing association meetings in Nov 2007	The need to have 24 hour provision in certain Care or Support services may cause

		<p>adverse impact for some people with dependents – for example, providing night cover or having to work anti-social hours may be problematic for those with dependents</p> <p>The availability of flexible working practices can help to reduce adverse impact for staff with dependents</p> <p>Family friendly policies could help</p>
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S75 Category	Source of data	Issues highlighted
Disability	IMS pre-consultation survey	<p>Employers will fill quota as regards disabled employees but are not pro-active in employing from this group *</p> <p>Access to documentation and information in different formats or from different sources</p> <p>Difficulty in gaining suitable job experience faced by those with disabilities *</p> <p>Need to consider people with mental health issues *</p> <p>Limited opportunity for high level jobs *</p> <p>Disabled people are under represented in employment *</p> <p>* seemed to be general comments rather than about associations</p>
	Housing association meetings in Nov 2007	<p>Staff suggested there was potential for adverse impact in application processes</p> <p>Staff highlighted access issues generally and the need to make reasonable adjustments as key concerns for anyone with a disability</p> <p>Staff were also conscious that the nature of certain jobs had the potential to limit their suitability for some people with a physical disability</p>
Gender	IMS pre-consultation survey	Limited choices for men at senior level
	Housing association meetings in Nov 2007	<p>Staff noted that it was characteristic of the social care sector to have a higher proportion of females in the workforce although this is not the case for senior positions.</p> <p>Recruitment of staff at different starting salaries for same post, with the potential for claims under 'Equal Pay' especially where it affects those who have broken career experience (e.g. females having a family) or who are unaware of the potential to negotiate their starting salary as there tends to be greater awareness among males</p>
Marital status	IMS pre-consultation survey	Application / monitoring forms should have sufficient boxes to allow someone to record a civil partnership
	Housing association meetings in Nov 2007	The main point highlighted was the impact of having to work on a rota system i.e for those employed in care or support work

S75 Category	Source of data	Issues highlighted
Political opinion	IMS pre-consultation survey	Consultees cited no issues
	Housing association meetings in Nov 2007	For those with convictions resulting from political activities the association should consider the context e.g. how long ago, nature of offence and impact on job / client group
Racial Group	IMS pre-consultation survey	Highlighted racism in employment (generally) i.e. employer pick 'local person' if presented with 2 similar CVs Availability of documentation / information in appropriate languages People from such groups can only achieve basic levels due to communications issues
	Housing association meetings in Nov 2007	Ensure that processes used do not exclude people whose first language is not English Identified criminal records checks as an area where Migrant Workers were treated differently i.e. often checking is not possible – this may cause adverse impact for UK applicants Need to ensure educational equivalencies can be assessed to avoid causing adverse impact
Religious belief	IMS pre-consultation survey	Ensure suitable pool of candidates take 'Civil Service' like approach to recruitment and recruit internally
	Housing association meetings in Nov 2007	Increase understanding through training for Managers on differing religious beliefs and/or practices Many associations offer 24 hour services which may impact on employees' ability to practice their religion Consider things like holy days when arranging interviews
Sexual orientation	IMS pre-consultation survey	Consultees made general comments indicating that there are prejudices against this group within employment, seen and unseen and that there is discrimination due to sexual orientation.
	Housing association meetings in Nov 2007	No issues were raised in this area but participants in the events recognised that lack of monitoring in this area could make it more difficult to determine if there was adverse impact

Profile of Applicants for Employment

4.4 Insert details as relevant to your association, for example:

The Association currently has 170 members of staff and our last annual Monitoring return to the Equality Commission indicated we received 272 applications for employment and recruited 43 staff during the year.

4.5 At present, Clanmil does not collect data on political opinion or sexual orientation. The 2006 Northern Ireland Life and Times Survey indicates that 0% of respondents described themselves as gay or lesbian. A research report by Youthnet argues that analysis of the Census 2001 indicates that between 2 and 10% of the population may be lesbian, gay or bisexual.

4.6 According to the 2006 Northern Ireland Life and Times Survey 36% considered themselves to be unionist, 23% stated that they were nationalists whilst 40% stated that they were neither.

During June 2008, Clanmil will add these categories to their monitoring form at the application for employment process to begin to gather the information on sexual orientation and political opinion.

4.7 Research from the Belfast Islamic Centre in 2007 estimates circa 6,000 residents who are Muslim as opposed to 1,943 cited in the 2001 census.

4.8 The statistics recorded in the Equality Commission Statement on Key Inequalities in Northern Ireland highlight issues in employment in relation to specifically females in higher managerial posts, issues for females with dependants, people with disabilities, barriers in relation to age, sexual orientation, migrant workers and the travelling community.

Complaints

4.9 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, during 2007-2008 the Association has received no complaints about its Recruitment and Selection policies that would indicate adverse impact arising from these policies.

Inspection/ Satisfaction Reports

- 4.10 Staff Satisfaction Reports carried out 2005/2006 indicated high support for Equality and Opportunity at Clanmil in which over 91% of staff indicated they strongly agreed their working environment was free from, discrimination. In exit interviews, staff are asked to comment on equality within Clanmil and there have never been any adverse issues raised.

Ombudsman Report

- 4.11 There have been no complaints raised with Clanmil where Clanmil was found to be at fault by the Ombudsman in relation to the Recruitment and Selection practices of this association.

Internal Audit

- 4.12 A full system review by Internal Auditors on Recruitment and Selection carried out in 2001 and reviewed in 2003 highlighted no adverse impact in relation to the employment practices pre employment within Clanmil Housing.
- 4.13 A full system review of recruitment and selection is scheduled to take place during the 2008-2009 programme of audits.

General Feedback

Investors in People

- 4.14 Clanmil Housing are accredited with the Investors in People standard.

ISO External Audits

- 4.15 The recruitment and selection procedures which include all pre employment procedures within Clanmil are included in the ISO 9000 : 2000 quality accreditation.
- 4.16 The procedures are all audited once yearly internally and periodically audited by external auditors SGS Yarsley.
- 4.17 The last audit conducted by the external auditors on recruitment and selection in 2005 indicated no corrective action to be carried out.

Other Feedback

- 4.18 RQIA inspection reports for the three residential care homes have raised no issues with the recruitment and selection policy for Clanmil

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- 4.19 The Northern Ireland Housing Executive Supporting People Review carried out in January 2007 and published in August 2007 raised no adverse issues in relation to the recruitment and selection process.

5. ASSESSMENT OF IMPACT

- 5.1 This section outlines our assessment of the impact of the Association's Recruitment and Selection policy on the 9 Section 75 groups based on the evidence considered above.
- 5.2 It has become apparent, following the conduct of this EQIA, that there are very few adverse impacts that are directly related to the Recruitment and Selection policy.
- 5.3 Many of the issues raised during the IMS Pre-consultation survey highlighted concerns around Recruitment and Selection in relation to services rather than specifically to Recruitment and Selection. 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.
- 5.4 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.
- 5.5 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 recruitment and selection, 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.

6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following are options that could potentially mitigate adverse impact arising from the HR Recruitment and Selection policies:

- Where appropriate and lawful, positive action advertising will be used. We will review our welcoming statement in advertisements. Consideration will be given to a positive welcoming statement to attract more male applicants across some categories of staff within the Association.
- Keep under review the written policies and procedures for recruitment and selection within Clanmil following the outcome of the consultation of the EQIA.
- Advertisements for all posts will state clearly that application forms are available in alternative formats on request.
- Promotion of Work-life Balance / family friendly policies. Continue to offer and improve the Clanmil Worklife Balance package for staff.
- Carry out a reviewed and updated staff attitude survey during 2008.
- Review the survey system for applicants, appointees and recruiters in relation to the recruitment and selection policy and procedures within Clanmil.
- Ongoing monitoring and implementation of the exit interview strategy for staff.
- IIP re-accreditation due during 2008.
- Continue to monitor applicant composition for statutory and company reports.
- Monitoring of the 9 groups for recruitment. Review format for monitoring.
- Revise the application form to remove any reference of the nine groups and include the monitoring information required on a separate confidential monitoring form

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- Include statistics from the groups of sexual orientation and political opinion in quarterly remuneration and staffing reports
 - Action any findings from the annual monitoring returns.
 - Consideration given to online recruitment.
 - Effective training regular and up-to-date.
 - Keep under review any accessibility issues to the recruitment and selection process i.e. language, disability etc.
 - Where external consultants are used, we will ensure that all selection techniques are valid and reliable.
 - Provide the Textphone number on all correspondence with applicants.
 - Consider the use of the Disability Advisory Service to advertise posts which could be considered by those with a disability

CONSULTATION

- 7.1 Clanmil Housing has endeavoured to give careful consideration to the measures that might be taken to make the Recruitment and Selection policy 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 Clanmil Housing will ensure that it consults effectively with those groups directly affected by its Recruitment and Selection policy, and their representatives.
- 7.3 Staff will be available to discuss these proposals in person, by telephone, textphone, 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 29 August 2008
- 7.5 Comments in relation to this report should be submitted in writing to:

Karen Gilmore

Clanmil Housing Association
Northern Whig House
3 Waring Street
BELFAST
BT1 2DX

- 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.
- 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
☎ 028 9023 0446
🌐 www.nifha.org

8. NEXT STEPS

- 8.1 Clanmil 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 A

The following tables have been taken from the 2006 Northern Ireland Life and Times survey. This survey has been used only to give indicative information in relation to the 9 Section 75 categories. Fieldwork for the 2006 survey was carried out between October 2006 and mid March 2007. 1230 adults were interviewed. The modules included were:

- Informal carers
- Community relations
- Healthcare
- Attitudes to Minority Ethnic People
- Political attitudes
- Background information on the respondents

AGE

Age of respondent (in age categories)

	%
18-24	14
25-34	14
35-44	19
45-54	20
55-64	15
65+	19

DEPENDENTS

Some people have extra family responsibilities because they look after someone who's sick, handicapped or elderly. May I check, is there anyone living with you who is sick, handicapped or elderly whom you look after or give special help to (for example, a sick, disabled or elderly relative, wife, husband, child, friend)?

	%
Yes	11
No	89

What about people not living with you, do you provide some regular service or help for any sick, disabled or elderly relative, friend or neighbour not living with you?

	%
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Yes	14
No	86

DISABILITY

Do you have a long-standing illness, disability or infirmity? By long-standing I mean anything that has troubled you over a period of time or that is likely to affect you over a period of time?

	%
Yes	32
No	68

GENDER

Sex of respondent

	%
Male	43
Female	57

MARITAL STATUS

Marital status of respondent

	%
Single (never married)	28
Married	53
Living as married	4
Separated	4
Divorced	4
Widowed	7

POLITICAL OPINION

Generally speaking, do you think of yourself as a unionist, a nationalist or neither?

	%
Unionist	36
Nationalist	23
Neither	40
Don't know	1

RACIAL GROUP

To which of these groups do you consider you belong?

	Number of respondents*
White	1206

Black	2
Asian	5
Chinese	2
Irish Traveller	2
Other (please specify)	8
None of these	4
Don't know	1

RELIGIOUS BELIEF

Do you regard yourself as belonging to any particular religion? If yes, which?

	%
No religion	13
Catholic	40
Church of Ireland or Anglican or Episcopal	15
Baptist	1
Methodist	3
Presbyterian	22
Free Presbyterian	2
Brethren	0
United Reform Church (URC) or Congregational	1
Pentecostal	1
Church of Scotland	0
Elim Pentecostal	0
Reformed Presbyterian	0
Non-subscribing Presbyterian	0
Church of Nazarene	0
Jehovah's Witness	0
Protestant - no-denomination	0
Christian - no denomination	1
Hindu	0
Other, please specify	0
Don't know	0
Refused	0

SEXUAL ORIENTATION

Can you tell me which of these best describes you?

	%
I am 'gay' or 'lesbian' (homosexual)	0
I am heterosexual or 'straight'	98
I am bi-sexual	0
I do not wish to answer this question	2

Appendix B



CONSULTATION AND FEEDBACK ON EQUALITY IMPACT OF CARE & SUPPORT AND HUMAN RESOURCES- RECRUITMENT & SELECTION POLICIES

Prepared for NIFHA by IMS (NI) Ltd
Ref: final/ 12/5/08

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1.0 Background

The Northern Ireland Federation of Housing Associations (NIFHA) represents and supports the voluntary housing movement in Northern Ireland. As an umbrella organisation representing, supporting and promoting the activities of the 36 registered and 7 non-registered Housing Associations in Northern Ireland, the Federation's purpose is to enhance the ability of housing associations to improve the social well being of people in Northern Ireland.

NIFHA and its members are striving to turn this vision into a reality. Housing Associations actively work to benefit the community by providing affordable accommodation and related housing services to those in greatest housing need. NIFHA's members manage approximately 30,000 units of accommodation. This equates to a quarter of all social housing in NI and since 1998 they have been responsible for virtually all new homes built.

NIFHA offers members a range of training programmes, including seminars and workshops, for support with housing policy and research, communications, administration and finance. NIFHA's main role is to promote its member housing associations and to provide representation and support for those members in the work that they do. As such, the Federation has been assisting its members in the implementation of Section 75 by co-ordinating a joint approach to the equality obligations.

Throughout the implementation of the equality process the Federation and its members have taken the view that by working jointly they can maximise resources – in terms of time, knowledge, expertise, staffing or finances – and at the same time minimise the administrative impact on consultee and/or stakeholder organisations. However, this approach is not intended to lessen the responsibility of each association. Mainstreaming equality and good relations is a major task, but NIFHA and its members believe that by working on the principle of **'joint effort, individual responsibility'** we can make a positive difference.

1.1 Scope of Research

As part of the Housing Associations consultation process, IMS (NI) Ltd a market research company was appointed to conduct a pre-consultation exercise to help NIFHA's members assess the impact of the Care and Support and HR – Recruitment and Selection policies on the Section 75 equality categories.

The policy aims and scope of the research project were agreed in consultation by NIFHA's Equality Co-ordination Group and working with IMS (NI) Ltd the consultation script was developed and administered.

The aim of the Care & Support policies is:

- To deliver to people with care and / or support needs appropriate services which maximise their quality of life (whilst operating within available resources).

The Care and Support function covers a broad range of policies that define how we provide care and / or support services to individuals with particular needs. This includes service areas such as:

- ¹Housing Support – This covers support services funded by supporting people grant* which is managed by the NIHE.
- Care Support – This covers care services funded by the health and social care trusts; the department of health and by personal care charges. By care support we mean personal care e.g. help with daily living tasks.
- Residential/Nursing Care – This covers care support provided in accommodation registered with the Regulation and Quality Improvement Authority (RQIA). This is usually funded by the health and social care trusts.
- Training and Employment Support – This covers training and employment support funded by the Department of Employment and Learning (DEL) and/or other government departments. By training and employment support we mean foyers; training schemes for tenants and assistance to individuals to access employment.

The aim of the Human Resources- Recruitment and Selection policy is:

- **To identify a suitable pool of candidates to meet the needs of the business (whilst operating within available resources).**

The Human Resources Recruitment and Selection function covers a broad range of policies that define how Housing Associations recruit and select new employees. This includes areas such as:

- Job analysis – This means the process of identifying the need for a post
- Job Description and Person specification – This refers to assessing the requirements of the post and the competencies required for the post
- Advertising – This refers to the use of appropriate advertising methods and media when recruiting
- Selection process – This covers panel composition, short listing, interview procedures and testing
- Monitoring of recruitment and selection process means how we comply with legal obligations in relation to collecting relevant statistical information on applicants for employment.
- Vetting and checking – This covers reference checks, POCVA checks, medical checks, Permit to Work, Qualification checks and relevant external bodies, where appropriate

1.1.1 Information Required

In consultation with NIFHA it was agreed the following information should be gleaned from the consultation process:

- Which aspects of the above policies most affect the Section 75 equality categories?
- What specific groups are affected and how?
- How could we make our policies fairer?

¹ See appendix I for full breakdown of definition

1.1.2 What the EQIAS do not include.

Care and Support

1. Access & Communications generally as the Year 1 EQIA on this policy dealt with overall issues relating to accessing the association's services (including care and support) and communicating with the organisation.
2. How we deal with complaints about Care and Support as this was covered by the Year 1 EQIA on Complaints
3. Situations where the association provides the building where the service is received but another organisation provides the support service.
4. How we handle repairs or improvements in a Care and Support setting as this was covered by a Year 2 EQIA
5. Setting support and other charges - this will be covered in a separate EQIA

Human Resources – Recruitment and Selection

1. 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.
2. How we deal with complaints about Recruitment and Selection as this was covered by the Year 1 EQIA on Complaints
3. The policies and procedures during employment – this will be covered in the EQIA in Year 4.
4. The recruitment of Board Members
5. **The specific recruitment and selection policies of joint management partners and recruitment agencies**

Please note: Copies of previous EQIA reports as mentioned above are available on request. Contact NIFHA if you require a composite disc containing all the associations' EQIA reports, alternatively hard copies may be obtained directly from the individual association. Contact details for Housing Associations can be found at www.nifha.org.

1.2 Methodology

A total of 150 consultees (see appendix II for list of consultee's who responded) were sent pre-consultation information with a covering letter during the week commencing 3rd March 2008. Telephone consultations began week commencing 10th March and finished on 18th March. A total of 25 surveys were successfully completed, however this was not without its problems, consultees were difficult to contact and when contact was made many declined due to time pressures or lack of interest.

After initial piloting of the script IMS and NIFHA amended the tele-script and provided a more thorough briefing for the telemarketers, they in turn explained to consultees that the consultation exercise was of benefit and directly impacted the people they represented and this improved overall success rate.

In total 465 calls were made which averages at approximately 3.1 per contact, however this figure is slightly skewed by the fact that 28 of the contacts on the list had no named person or were invalid i.e. telephone number no longer in use etc. Many of the remaining 57 contacts were contacted 6/7 times to no avail.

It is worth noting that NIFHA, the designated Housing Associations and IMS (NI) Ltd were disappointed with the number and quality of the responses. While all three parties recognise the capacity and time pressures faced by consultee organisations it was felt this method of gathering information would be the least resource intensive. The housing associations are keen to ensure that their policies are effective and that service users are involved in the policy making process so it is regrettable that over half of the consultee organisations either could not or would not respond. The following table gives a breakdown of the outcomes:

Breakdown of Outcomes

Outcome	Actuals	Percentages
Completed	25	17%
Declined	23	15%
Call backs	57	38%
Emailed to be followed up again	17	11 %
Invalid	28	19%
Totals	150	100%

1.3 Reasons for Response Rates

The majority of the completed consultations were primarily by the larger agencies, government departments and local councils. Similarly to last year it became apparent due to the nature of the sector and the agency structures that many of the smaller consultees did not have the resources or time to complete the consultation exercise or were just uncontactable by telephone. 23 consultees declined to complete the survey with the main reasons listed below:

- It is not relevant to us,
- They refused to prioritise as everyone should be viewed as equal,
- Policies land on desk every day, and no time to read them all,
- Too busy to carry out survey,
- Do not have capacity to respond,
- Not central to their work,
- Not interested.

2.0 Emerging Trends and Recommendations

The telephone research was slow with many call backs; few named consultees were available, many only working part time or on a voluntary basis. Out of 150 contacts only 25 consultations were conducted by telephone (mostly with the larger agencies – see appendix II for breakdown) Many of the consultees on the list did not have the correct contact information and again this is due to the nature of the industry where volunteers are responsible or in some cases the agency was no longer in existence. Surprisingly 23 of the consultees declined to complete the questionnaires due to time pressures or perceived lack of valuable input.

There appears to be a general lack of awareness with the consultee groups generally about Housing Associations, NIFHA and their role. It would be recommended that before any further consultations take place or as part of NIFHA's ongoing relationship building within the equality community that specific PR events are organised to demonstrate the relevance of the work of HA's to the individuals the consultees represent and to thank those who take time out to give valuable feedback.

IMS recommends that the consultation script may be simplified i.e. one topic one consultation, some respondents found it confusing discussing Care and Support issues and then jumping to HR Recruitment and Selection issues.

To ensure an increased response rate with future consultations, it would be recommended that the surveys be conducted face to face or in a focus group scenario and a copy of the actual questions be sent with the pre-consultation information which will allow consultees to have answers prepared in advance.

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.

It is important to note that 70% of the consultees were particularly interested in Housing Care under Care and Support which means that most of the responses related particularly to this area; however many of their key concerns about Care and Support are in relation to accessibility and quality of information available and the impact this has on all equality groups.

Under HR Recruitment and Selection some consultees expressed concern about ensuring fair policies are implemented that don't discriminate against candidates, specifically those that are disabled or older. There was also concern from representatives of the lesbian, gay, bisexual or transsexual communities about how staff may be treated once recruited and recommend an initial review for all staff within 6 months of selection. It should be stressed that these were general concerns about all employers across all sectors and not directly related to housing associations.

3.0 Summary of Key Findings

3.1 Reasons for pre-consultation

It would increase response rate
Recognised as good practise
Would encourage more informed feedback
Demonstrate NIFHA's commitment to engage with consultees

3.2 Use of IMS

Track record with last consultation
Easier to manage than administering internally
Better response rates
More objective feedback

3.3 Response rates

150 consultees
25 completed
23 declined
57 call backs
17 emailed but didn't respond
28 invalid
Call rate on average 3.2 however most were 6/7 call backs.

3.4 General issues on why consultees did not complete.

General lack of apathy towards consultation exercise – not interested
Not relevant
No time to respond

3.5 Focus of the responses– Carer and Support

Housing Care	70%
Care Support	44%
Residential / Nursing Care	36 %
Training and Employment support	44%

3.6 Focus of the responses - HR

Job Analysis	36%
Job description and specification	44%
Advertising	45%
Selection process	37%
Monitoring	48%
Vetting and Checking	28%
Other	16%

It is important to note that whilst the key issues are summarised in the tables below, many are not directly relevant to the two policy areas under review or within the associations' power to implement. For this reason it is necessary that the comments are

working together for better housing

not taken in isolation. NIFHA's Equality Coordination Group has responded to the points made where appropriate in Section 4 of the report and it is recommended that you read this section. However, the Coordination Group's responses are for the most part general in nature so if any consultee wishes to discuss the issues s/he raised in greater detail the Federation would be happy to facilitate a meeting.

3.7 Key Issues for Care and Support

Lack of understanding about the services available.

Communities in certain rural areas will have a lack of care. Equality issues will depend on the Housing Associations administering the support

BME'S will be affected

Language barrier in terms of understanding how to access information and the quality of information available.

Single people have issues on availability of housing and support.

With older people there can be a lack of care at home, mobility and access issues.

People with disabilities need to be included in policy making

Young people with same sex relationships find it difficult to access support

Specific consideration should be given to groups with multiple problems i.e. disabled persons who need care and support because of age, race or sexuality.

3.8 Key Issues for HR- Recruitment and Selection

Take civil service like approach to recruitment and internally recruit.

If the policy is effective it should affect all the groups.

Perception of racism toward migrant workers.

There needs to be access to documentation / information in the appropriate language/s.

There is a perception with consultees that there is a bias against employing older people

Application forms need to address the balance between age / experience and skills requirement so as not to exclude younger people.

Employers will fill their quota as regards disabled employees- but are not pro active in employing from this group.

All groups included. No disqualification.

Access to documentation and information in different formats from different sources.

Appropriate job experience for those with disabilities.

Consideration for those with mental health issues.

Opportunities for high level jobs are very limited.

Perception of prejudice against this sexual orientation group within employment.

4.0 Responses to Survey

4.1 Care and Support

Q1 : Under Care and Support there are (as identified by NIFHA Consultation group), 4 main areas of support. Please indicate the area/s applicable to you in terms of the groups you represent.

The table below indicates the main areas of interest by consultees, under Care and Support. The main area that most consultees are interested in is Housing Support which includes support services funded by supporting people grant.

Support Area	% Responded
Housing Support	70%
Care Support	44%
Residential/Nursing Care	36%
Training and Employment Support	44%

Q2: Under the following equality categories can you please state the groups that will be most effected by the Care and Support policies and state the issues that may affect them.

Equality Categories	Specific Groups Represented by Consultees	What are the issues	Response by NIFHA's ECG
Religious belief - Protestants; Catholics; people of non-Christian faiths; people of no religious belief	<ul style="list-style-type: none"> Travellers Migrant workers from rural communities 	<ul style="list-style-type: none"> Equality of service Communities in certain rural areas will have a lack of care. It depends on which Housing Association is administering the support BME'S will be affected Limit houses which are taken by one part of the community. 	<p>Housing Associations (HAs) are committed to providing high quality services for the whole community and many were originally formed to tackle adverse impact.</p> <p>We acknowledge and welcome the consultees' comments however some of the issues are not in the associations' control:</p> <ul style="list-style-type: none"> Health & Social Care Trusts determine the level and type of care provision Northern Ireland Housing Executive (NIHE) determines housing need
Political opinion - Unionists; Nationalist		<ul style="list-style-type: none"> No issues cited by consultees 	

members/supporters of any political party			
Racial group - White people; Chinese; Travellers; Indians; Pakistanis; Black people	<ul style="list-style-type: none"> Black and minority backgrounds Chinese and Migrant Workers 	<ul style="list-style-type: none"> They may be unaware of what sort of care and support there is available, if they have been victims of racism or hate crimes. Language barrier in terms of understanding how to access information and the quality of information available. 	<p>We note the issues raised but consider they relate to Access and Communications rather than Care and Support policies.</p> <p>Housing associations recognise the vital role Access and Communications plays in enabling equality of opportunity therefore we prioritised these policies in our first EQIA in 2005/06.</p>
Men and women generally - Men (including boys); women (including girls), Trans-gendered people, Transsexual people		<ul style="list-style-type: none"> There may be a need to keep separate policies for men and women. Homophobic attacks on homes. 	<p>Housing associations are committed to meeting legal obligations and applying best practice therefore such policies could only be applied if it is appropriate.</p> <p>The Care and support policies under review in this EQIA only relate to the specific types of service stated at 1.1. It does not cover homophobic attacks which are crimes.</p>
Marital Status -Married people; unmarried people; divorced or separated people; widowed people	<ul style="list-style-type: none"> Single groups Divorced groups 	<ul style="list-style-type: none"> Single people have issues on availability of housing and support. Divorced people find it difficult to get a new home- which limits the choice of where to home the children 	<p>The HAs acknowledge and welcome the consultees' comments listed however as mentioned previously some of the issues are not in the associations' control:</p> <ul style="list-style-type: none"> Health & Social Care Trusts determine the level and type of care provision the Northern Ireland Housing Executive (NIHE) determines housing need
Age - Children under 16; people of working age (16/65); people over 65	<ul style="list-style-type: none"> Older people, post retirement Young people 	<ul style="list-style-type: none"> With older people there can be a lack of care at home, mobility and access issues. Over 60's have specific care needs which aren't necessarily addressed. There are issues surrounding the access to services for older and younger groups, and how the services are currently delivered. Older people- in run down housing due to financial issues. 	<p>This EQIA relates only to the specific types of service stated at 1.1; however the HAs acknowledge and welcome the consultees' comments.</p> <p>While HAs have to work within the criteria laid down by a range of statutory organisations we advocate a joined-up approach to ensure that no individual / group experiences adverse impact.</p>
Persons with a physical, sensory, mental or learning disability - as	<ul style="list-style-type: none"> All disability groups Mental Health groups 	<ul style="list-style-type: none"> Mobility and access issues, if there is personal care available Are policies amended to specifically accommodate mental health area? 	<p>This EQIA relates only to the specific types of service stated at 1.1, however the HAs acknowledge and welcome the consultees' comments.</p>

defined in sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995	<ul style="list-style-type: none"> Deaf people 	<ul style="list-style-type: none"> This section of the community need to be included in policy making Everyone has different needs through their life span. Some are more dependant than others. Main issues are where, when and how people can have access and also to push for an independent society 	HAs are committed to involving service users in the policy making process and welcome this opportunity to obtain feedback from external stakeholders.
Persons with dependants - Persons with personal responsibility for the care of a child; a person with an incapacitating disability; or a dependant elderly person	<ul style="list-style-type: none"> Carers 	<ul style="list-style-type: none"> No issues cited by consultees 	
Sexual orientation - Heterosexual people; homosexual people; bisexual people		<ul style="list-style-type: none"> Younger people in particular who have possibly been put out of home by family because of sexual orientation find there is no housing / care support available to them. Higher consideration should be given if they have been victims of hate crimes or homophobic attacks on homes. People who have grown up in a society which is not-accepting of same sex relationships and may be alone feeling they have to hide their true identity if they have to move to residential homes. 	<p>This EQIA relates only to the specific types of service stated at 1.1, however the HAs acknowledge and welcome the consultees' comments.</p> <p>While HAs have to work within the criteria laid down by a range of statutory organisations we advocate a joined-up approach to ensure that no individual / group experiences adverse impact.</p>
Cross-cutting or multi-group - (this is applicable if the group involved falls into more than one group)		<ul style="list-style-type: none"> Specific consideration should be given to ethnic groups with other problems Specific consideration should be given to groups with multiple problems i.e. disabled persons who need care and support because of age, race or sexuality. 	<p>HAs are committed to providing high quality services for the whole community and many were originally formed to tackle adverse impact.</p> <p>We acknowledge and welcome the consultees' comments.</p>

Q3: Under the four main support areas, how could we amend the policies?

Policy Area	Comments on how to amend policies.	
Housing Support	<ul style="list-style-type: none"> • Currently not sure of content of policies, but they should be monitored and evaluated to ensure successful implementation. • The sexual orientation group needs to be treated as a specific issue, regarding intimidation, hate crimes or fear of revealing their identity. • Consideration must be given to victims of hate crimes and if they require particular help. • All policies must be amended with involvement from users and their representatives. • Policies must be fair and include the needs of all; they should not discriminate due to illness or personal situations. • There should be funding made available to support specific groups with problems accessing housing and subsequent care support. • For all support areas- main discussions/arguments are that the 'real people' who are living in those situations should be the ones to propose a policy. 	care ones
Care Support	<ul style="list-style-type: none"> • Consultations on policies, engaging with groups affected ensuring carers are informed of decisions. • Policies must be amended with involvement from users and their representatives. • Policies should specifically cater for mental health and separate sexes. • Outreach programme for care groups to gain better understanding of impact of policies. 	
Residential/Nursing Care	<ul style="list-style-type: none"> • Must be amended with involvement from users and their representatives. • Work with specific housing associations that cater for the needs of the elderly Chinese community. 	
Training and Employment Support	<ul style="list-style-type: none"> • Specific issue as they may feel fear of revealing their identity to employers/co-workers. • Policies should be compliant with flexible working laws. • A variety of schemes would be necessary to cover all sections of the community. • Equal choices must be given to all sections of the community. • Must be amended with involvement from users and their representatives • Migrant workers should have access to training and employment support. • Men/women, migrant workers and multi groups - the information barrier is the main problem. Majority of information provided is not available in Chinese. Housing Executive information is available in Chinese. 	is

Q4: Additional issues or comments specifically about Care and Support.

Additional Comments

- Seems to be a centralised approach, should responsibility lie with each individual Housing Association.
- There must be consultation with recipients of care and support and those providing the care and support
- Ensure effective communication support- e.g. - interpreters need to be booked well in advance
- Women, Men, Single Parents etc in the rural areas need more care so they can become more independent. One of the main questions is 'how can you define care?' everyone needs to be cared for and everyone will be a carer at some point of life it is not just for the elderly society, but for everyone.
- Many of the Chinese immigrants are not getting what they are entitled to e.g. benefits, care and support. Language barrier is a huge problem within the community and more support should be provided. Consultees feel that they are not always updated about new policies, so more from NIFHA would be great.

The Equality Co-ordination Groups Responses to the points raised at Q3 & 4

- We acknowledge and welcome the consultees' comments and thank them for taking the time to participate in this pre-consultation exercise.
- The Housing Associations are committed to involving service users in the policy making process and welcome this opportunity to obtain feedback from external stakeholders.
- The designated associations will consider this information when conducting the impact assessment stage of the Care & Support EQIA. As every association is an independent voluntary organisation each will gauge how the comments apply within their own organisation.
- As stated earlier some of the issues raised are not within the control of the Housing Associations, for example the training and employment support mentioned is only available in certain housing situations, however we are happy to refer such points to the relevant body.
- NIFHA co-ordinates a joint exercise to assist the 35 designated Housing Associations with the implementation of their equality obligations. As explained at 1.0 (Background) this collaborative approach is intended to streamline the administrative side of the process and encourage the sharing of good practice but responsibility for the implementing the Statutory Duties still remains with the individual association. The Equality Commission has commended this approach.
- We believe the consultees' comments will prove useful when determining appropriate Mitigating Measures.

4. 2 Recruitment and Selection

Q5 : Detailed below are the areas of interest under the HR Recruitment and Selection policies expressed by the consultees.

The main areas that consultees are most interested in are job description, person specification and advertising, however the split was relatively even across all recruitment areas.

Recruitment and Selection area	% Responded
Job analysis	36%
Job Description and Person Specification	44%
Advertising	45%
Selection process	37%
Monitoring	48%
Vetting and checking	28%
Other – Please list <ul style="list-style-type: none"> Positive discrimination to fill posts. Even if advertise rely heavily on word of mouth Recognise qualifications that are from different countries. Application forms need to be reviewed in line with EQIA policies. 	16%

Q6: Under the following equality categories can you please state the groups that you feel will be most affected and what would the issues be?

The groups that are most affected tend to be foreign workers, older employees and persons with a physical, mental or learning disability. The main issues perceived to be affecting these groups tend to be discriminatory which impacts on the person's ability to achieve their full potential within the industry.

Equality Categories	Specific Groups Represented by Consultees	What are the issues?	Response by NIFHA's ECG
Religious belief - Protestants; Catholics; people of non-Christian faiths;		<ul style="list-style-type: none"> Ensure suitable pool of candidates, take civil service like approach to recruitment, does it mean we would not have to openly advertise 	The 35 designated HAs are independent organisations which operate in line with ECNI guidance. HAs cannot take a civil service approach as this would not be a representative pool of applicants.

people of no religious belief			
Political opinion - Unionists generally; Nationalist generally; members/supporters of any political party		<ul style="list-style-type: none"> • No issues cited by consultees 	
Racial group - White people; Chinese; Travellers; Indians; Pakistanis; Black people		<ul style="list-style-type: none"> • There is still racism within employment where 2 identical CV's are sent in more often the person with a "local" or familiar name is employed over a "foreign" or unfamiliar name. • There needs to be access to documentation / information in the appropriate language/s. • These groups can only achieve basic levels, due to communication issues. 	<p>We acknowledge and welcome the consultees' comments. Some points are not consistent with our information but we welcome the opportunity for further discussion. HAs are committed to employing staff on the merit principle.</p> <p>We note the issues raised but consider that a number relate to Access and Communications rather than Recruitment and Selection policies. Housing Associations recognise the vital role Access and Communications plays in enabling equality of opportunity therefore we prioritised these policies in our first EQIA. HAs are committed to setting appropriate requirements for posts, including communications skills.</p>
Men and women generally - Men (including boys); women (including girls), Trans-gendered people, Transsexual people		<ul style="list-style-type: none"> • Limited choices for men at senior level. 	<p>This is not consistent with our information. 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 is reflected even further at Chief Executive level of the 38 posts at that time only 7 were held by females.</p>
Marital Status -Married people; unmarried people; divorced or separated people; widowed people		<ul style="list-style-type: none"> • No issues cited by consultees 	
Age - Children under 16; people of working age (16/65); people over 65	over 60's	<ul style="list-style-type: none"> • There is a bias against employing older people who are approaching retirement as the employers feel they may not have them for long enough or they may present health problems. • Specifying timed experience (i.e. 2 years exp needed) rather than competency can exclude 	<p>We acknowledge and welcome the consultees' comments but believe this is not entirely reflective of our sector. For further information see the specific HAs EQIA reports.</p> <p>HAs are committed to setting appropriate requirements</p>

		younger people.	for posts.
Persons with a physical, sensory, mental or learning disability - as defined in sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995		<ul style="list-style-type: none"> • Employers will fill their quota as regards disabled employees- but are not pro active in employing from this group. • Access to documentation and information in different formats from different sources. • How can those with disabilities gain suitable job experience? • Consideration for those with mental health issues. • Opportunities for high level jobs are very limited. • These groups are under represented in employment. 	<p>We acknowledge and welcome the consultees' comments but believe this is not reflective of our sector.</p> <p>To our knowledge the quota system no longer applies. We note the issues raised but consider they relate to Access and Communications rather than Recruitment and Selection policies. (This was addressed in a previous EQIA see above)</p> <p>Many HAs were originally formed to tackle adverse impact and they are very conscious of the issues raised. Some have programmes in place to encourage the employment of people with disabilities. HAs worked with Disability Action to identify the most relevant priorities when developing Disability Action Plans.</p>
Persons with dependants - Persons with personal responsibility for the care of a child; a person with an incapacitating disability; or a dependant elderly person		<ul style="list-style-type: none"> • No issues cited by consultees 	
Sexual orientation - Heterosexual people; homosexual people; bisexual people		<ul style="list-style-type: none"> • There are prejudices against this group within employment, seen or unseen. • There is discrimination due to sexual orientation. 	HAs are committed to equality of opportunity and promoting good practice in relation to all of the Section 75 categories. We appreciate this is a generic comment and not specific to HAs
Cross-cutting or multi-group		<ul style="list-style-type: none"> • All groups included. No disqualification 	Housing associations welcome applications from all sections of the community.

Q7 How can we amend policies to be more inclusive?

Policy area	Comments on how to amend policies
Job analysis This means the process of identifying the need for a post	<ul style="list-style-type: none"> No issues cited by consultees
Job Description and Person specification This refers to assessing the requirements of the post and the competencies needed for the post	<ul style="list-style-type: none"> On application forms there are often just 2 boxes to tick- single or married. Those who are in a long term relationship or a civil partnership are not considered. The job specification needs to be more flexible Job descriptions need to be more flexible in hours and location. Is there a possibility of home -working or job sharing to enable caring? Some of the specifications aren't really necessary for the job, i.e. driving licence/specific qualifications it is more important to consider skills and experience of the individual. Ensure the wording on recruitment documents is not a barrier to applicants.
Advertising This refers to the use of appropriate advertising methods and media when recruiting	<ul style="list-style-type: none"> There is a need to reach various groups through advertising in different languages. Providing translations or different formats for racial and disabled groups. There should be guidelines as to where recruitment ads are placed. Wording in adverts should be more specific, encouraging applications from disabled people rather than just saying we are equal opportunities employer. Offer a range of formats for applications. Advertise in specific press to encourage disabled applicants
Selection process This covers panel composition, short listing, interview procedures and testing	<ul style="list-style-type: none"> Those who are in a position to select candidates or employees need a training programme of sexual- orientation / race/age awareness provided by some of the groups that work specifically in these areas. There is a culture of hidden prejudice in NI that many employers are unaware of. To select through all groups taking into consideration years of experience v's competency. Selection panel must be representative of Section 75 - groups must be properly trained and not just "aware" of disability issues. The selection process needs to be reviewed
Monitoring of recruitment and selection process means how we check that the way we implement the process is in line with our policy aim	<ul style="list-style-type: none"> All ages should be considered, not just religious/sex monitoring. There should be monitoring of those who asked for applications (specifically in different formats) and did not return them. Applications from people with disabilities should be monitored; Housing Associations should work in agreement with other organisations if necessary. There is a need to monitor sexual orientation of candidates if successful.

Vetting and checking This covers reference checks, POCVA checks, medical checks, Permit to Work, Qualification checks and relevant external bodies, where appropriate	<ul style="list-style-type: none"> Implementation of good and thorough disability awareness training.
Other – please note	<ul style="list-style-type: none"> Flexible hours to meet everyone's needs Need to include policy for the recruitment of board members including procedures, and job descriptions.

Q8 : Additional Comments

Additional Comments
<ul style="list-style-type: none"> Refer to the Equality Commission Recently published research on employers for carers - www.carersni.org Section 75 needs to be adhered to at all times and this should be monitored The polices in general need to be inclusive of all groups needs. There should not be a fear that if they disclose personal information they may face discrimination. There is a requirement for more recruitment and selection training within the industry to facilitate progress.

ECG's Response to the points raised at Q7 & Q8

- We acknowledge and welcome the consultees' comments and thank them for taking the time to participate in this pre-consultation exercise.
- Housing Associations comply with Equality Commission guidance on gathering monitoring information. Associations currently collect a range of data on their monitoring forms.
- Housing Associations are committed to involving service users in the policy making process and welcome this opportunity to obtain feedback from external stakeholders.
- Housing Associations comply with employment law and ECNI guidelines, including those on the placing of adverts. They are also committed to implementing equality of opportunity and promoting good practice.
- The designated associations will consider this information when conducting the impact assessment stage of the Recruitment & Selection EQIA. As every association is an independent voluntary organisation each will gauge how the comments apply within their own organisation.
- We believe the consultees' comments will prove useful when determining appropriate Mitigating Measures.
- Whilst the practices of the individual organisation may vary in general Housing Associations have a positive approach to flexible working policies.

Q9 : List of additional relevant research that could be considered.

Relevant Research	
Care and Support	HR – Recruitment and Selection
<ul style="list-style-type: none"> • Belfast council will publish a "state of the borough" document in summer 2008 and this will be accessible through their website • There are other EQIA's completed by the public sector that would be published. 	<ul style="list-style-type: none"> • Equality Commission's employment policy. • "Blocked Opportunities for Employment", "Breaking the silence '98", Disability Action- Researching Employment in Hospitality
<ul style="list-style-type: none"> • Recent research by Equality commission 	<ul style="list-style-type: none"> • Staff Commission for Education & Library Boards "equality impact assessment" on recruitment.
<ul style="list-style-type: none"> • NIHE research on homelessness and sexual orientation- access to temp housing • Administration of justice- Recreation and Reality policies 	<ul style="list-style-type: none"> • Equality commission "unified code on process and equality code"

Appendices

Appendix I : Pre- Consultation Information

PRE-CONSULTATION RESEARCH FOR YEAR 3 EQUALITY IMPACT ASSESSMENTS

Consultation

We are currently carrying out a pre-consultation exercise to help us assess the impact of our Human Resources Recruitment & Selection and Care & Support policies across the Section 75 equality categories.

We will be seeking to make contact with you by telephone between 3 March and 14 March 2008.

The purpose of this document is to provide you with details about:

- What Housing Associations are and what they do
- Our Human Resources Recruitment & Selection policies
- Our Care & Support policies
- The type of information we need from you

What housing associations are and what they do

A housing association is a voluntary organisation which works to help the community by providing decent, affordable accommodation and related support services to those in greatest need. For more details please go to www.nifha.org.

The Equality Commission has designated 35 Housing Associations. They are all independent organisations and vary in size and provide different types of accommodation and services.

The Department for Social Development (DSD) regulates all registered Housing Associations.

Housing Associations are the main providers of the social housing development programme. The Northern Ireland Housing Executive manages this programme. Most schemes are funded through a mixture of grants from the DSD and private finance.

AIM OF POLICIES

The aim of the Human Resources recruitment and selection policies is to identify a suitable pool of candidates to meet the needs of the business (whilst operating within available resources).

The aim of the Care & Support policies is to deliver to people with care and / or support needs appropriate services which maximise their quality of life (whilst operating within available resources).

What we mean by Human Resources – Recruitment & Selection

Our Human Resources recruitment and selection function covers a broad range of policies that define how we recruit and select new employees. This includes areas such as:

- Job analysis – This means the process of identifying the need for a post
- Job Description and Person specification – This refers to assessing the requirements of the post and the competencies required for the post
- Advertising – This refers to the use of appropriate advertising methods and media when recruiting
- Selection process – This covers panel composition, shortlisting, interview procedures and testing
- Monitoring of recruitment and selection process means how we comply with legal obligations in relation to collecting relevant statistical information on applicants for employment.
- Vetting and checking – This covers reference checks, POCVA checks, medical checks, Permit to Work, Qualification checks and relevant external bodies, where appropriate

What we mean by Care and Support

Our Care and Support function covers a broad range of policies that define how we provide care and / or support services to individuals with particular needs. This includes service areas such as:

- **Housing Support** – This covers support services funded by supporting people grant* which is managed by the NIHE. By housing support we mean:
 - sheltered housing for older people
 - supported housing for people with special needs
 - floating support which is outreach services based on the needs of the individual regardless of whether they are a tenant of the association

**Please see below for details.*

- **Care Support** – This covers care services funded by the health and social care trusts; the department of health and by personal care charges. By care support we mean personal care e.g. help with daily living tasks.
- **Residential/Nursing Care** – This covers care support provided in accommodation registered with the Regulation and Quality Improvement Authority (RQIA). This is usually funded by the health and social care trusts.

- **Training and Employment Support** – This covers training and employment support funded by the Department of Employment and Learning (DEL) and/or other government departments. By training and employment support we mean foyers; training schemes for tenants and assistance to individuals to access employment.

* Supporting People funding may be available to help the following types of people:

- Older people
- People with learning difficulties
- People with mental health problems
- People with physical disabilities
- Women fleeing domestic violence
- Homeless people
- People struggling to meet their tenancy conditions
- People leaving institutional care

QUESTIONS

We want to know:

- Which aspects of the above policies most affect the Section 75 equality categories?
- What specific groups are affected and how?
- How we could make our policies fairer?

WHAT THESE EQIAS DO NOT INCLUDE

Human Resources – recruitment and selection

This EQIA will **NOT** cover:

1. 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.
2. How we deal with complaints about Recruitment and Selection as this was covered by the Year 1 EQIA on Complaints
3. The policies and procedures during employment – this will be covered in the EQIA in Year 4.
4. The recruitment of Board Members
5. The specific recruitment and selection policies of joint management partners and recruitment agencies

Care and Support

This EQIA will **NOT** cover:

1. Access & Communications generally as the Year 1 EQIA on this policy dealt with overall issues relating to accessing the association's services (including care and support) and communicating with the organisation.
2. How we deal with complaints about Care and Support as this was covered by the Year 1 EQIA on Complaints
3. Situations where the association provides the building where the service is received but another organisation provides the support service.
4. How we handle repairs or improvements in a Care and Support setting as this was covered by a Year 2 EQIA
5. Setting support and other charges - this will be covered in a separate EQIA

Appendix II – Consultee List

	Name	Organisation
1	Kevin Higgins	Association of Independent Advice Centres/ ADVICE NI
2	Marie Craig	Belfast City Council
3	Steve Williamson	Carafriend
4	Helen Ferguson	Carers Northern Ireland
5	Lisa Adair	Carrickfergus Borough Council
6	Anne Basten	Central Services Agency
7	Lucy Cochrane	Citizens Advice Regional Office
8	Majella McCloskey	CO3 Chief Officers Third Sector
9	Angela Trimby	Department for Social Development
10	Patricia Bray	Disability Action
11	Daniel Holder	Dungannon & South Tyrone District Council
12	Fred Munce	Methodist Church in Ireland
13	Christine McConney	Mind Yourself
14	Margaret Donaghy	Multi-Cultural Resource Centre
15	Shirley Poxton	North Down Borough Council
16	Mary Coffey	Probation Board for Northern Ireland
17	Brian Symington	Royal Institute for Deaf People (NI)
18	Michael Hughes	Rural Community Network
19	Anna Low	Sai Pak Chinese Welfare Association
20	Deirdre Vaughn	Staff Commission for Education & Library Boards
21	Brian Holmes	Supporting Communities NI
22	Mirjam Bader	The Rainbow Project
23	Thomas McAfee	UNISON
24	Nicola Helferty	Western Health & Social Services Board
25	Kathleen Feenan	Women's Information Group

Appendix III- NIFHA – Equality Survey

1	(When speaking to contact – in the case of no contact given please ask for the person responsible for policy development/ implementation)
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	<p>Good Morning/Afternoon</p> <p>My name is _____</p> <p>I am calling from IMS on behalf of the Northern Ireland Federation of Housing Associations and we are currently conducting research to help us assess the problems or issues that any of our Care & Support and Human Resources – recruitment and selection policies may cause for the group(s) you represent. Would you be able to run through the questions now?</p> <p><i>Please note that the candidate may not be able to complete questions on both sections – please ask before the questionnaire starts if they are able to answer questions on care and support and Recruitment and Selection. They can answer one, or both sections.</i></p> <p>If no – Thank and close – or ask if you can call back at a time that suits. If they have refused please note reason for not participating.</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div> <p>If yes – progress to next question.(3)</p>
	<p>Section 1 – Care and Support</p>
<p>2</p>	<p>Specific Policy Area</p> <p>Under Care and Support there are 4 main areas, which of these areas, if any are applicable to your group? (Tick as many boxes as necessary.)</p>

	<u>Support Area</u>	Please tick
	Housing Support This means support services funded by supporting people grant* which is managed by the NIHE. By housing support we mean: <ul style="list-style-type: none"> sheltered housing for older people supported housing for people with special needs floating support which is outreach services based on the needs of the individual regardless of whether they are a tenant of the association 	
	Care Support This means care services funded by the health and social care trusts; the department of health and by personal care charges. By care support we mean personal care e.g. help with daily living tasks.	
	Residential/Nursing Care This means care support provided in accommodation registered with the Regulation and Quality Improvement Authority (RQIA). This is usually funded by the health and social care trusts.	
	Training and Employment Support This covers training and employment support funded by the Department of Employment and Learning (DEL) and/or other government departments. By training and employment support we mean foyers; training schemes for tenants and assistance to individuals to access employment.	
3	Groups Affected Under the following equality categories can you please state the groups that you feel will be most affected by Care and Support policies? What are the main issues that you feel will effect this group?	

Categories	Specific Groups (enter details)	What are the issues ?
Religious belief - Protestants; Catholics; people of non- Christian faiths; people of no religious belief		
Political opinion - Unionists generally; Nationalist generally; members/supporters of any political party		
Racial group - White people; Chinese; Travellers; Indians; Pakistanis; Black people		
Men and women generally - Men (including boys); women (including girls), Trans- gendered people, Transsexual people		
Marital Status -Married people; unmarried people; divorced or separated people; widowed people		
Age - Children under 16; people of working age (16/65); people over 65		
Persons with a physical, sensory, mental or learning disability - as defined in sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995		
Persons with dependants - Persons with personal responsibility for the care of a child; persons with personal responsibility for the care of a person with an incapacitating disability; persons with personal r		

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4 Under these 4 main support areas, how could we amend the policies to be more inclusive of your group's needs?

Support	Groups Affected	Comments on how to amend policies.
Housing Support This means support services funded by supporting people grant* which is managed by the NIHE.		
Care Support This means care services funded by the health and social care trusts; the department of health and by personal care charges. By care support we mean personal care e.g. help with daily living tasks.		
Residential/Nursing Care This means care support provided in accommodation registered with the Regulation and Quality Improvement Authority (RQIA). This is usually funded by the health and social care trusts.		
Training and Employment Support This covers training and employment support funded by the Department of Employment and Learning (DEL) and/ or other government departments. By training and employment support we mean foyers; training schemes for tenants and assistance to individuals to access employment.		

5 Are there any other issues or comments that you feel may not have been covered in the above question? (list below)

	Comments
	Section 2: Human Resources – Recruitment & Selection

6	We are interested in finding out what recruitment and selection policies most affect the groups you represent from these main areas. (Please tick as many boxes as necessary.)	
	Recruitment and Selection area	Please tick
	Job analysis -This means the process of identifying the need for a post	
	Job Description and Person Specification This refers to assessing the requirements of the post and the competencies needed for the post	
	Advertising This refers to the use of appropriate advertising methods and media when recruiting	
	Selection process This covers panel composition, short listing, interview procedures and testing	
	Monitoring of recruitment and selection process means how we check that the way we implement the process is in line with our policy aim	
	Vetting and checking This covers reference checks, POCVA checks, medical checks, Permit to Work, Qualification checks and relevant external bodies, where appropriate	
Other – Please list		

7	Groups Affected
	Can you please state the groups that you feel will be most affected by the policies under these categories?

Categories	Specific Groups (enter details)	What are the issues?
Religious belief - Protestants; Catholics; people of non-Christian faiths; people of no religious belief		
Political opinion - Unionists generally; Nationalist generally; members/supporters of any political party		
Racial group- White people; Chinese; Travellers; Indians; Pakistanis; Black people		
Men and women generally - Men (including boys); women (including girls), Trans-gendered people, Transsexual people		
Marital Status - Married people; unmarried people; divorced or separated people; widowed people		
Age - Children under 16; people of working age (16/65); people over 65		
Persons with a physical, sensory, mental or learning disability - as defined in sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995		
Persons with dependants- Persons with personal responsibility for the care of a child; persons with personal responsibility for the care of an adult		

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8	Under the 6 main recruitment areas, how could we amend the policies to be more inclusive of your group's needs?		
	Policy	Groups Affected	Comments on how to amend policies.
	Job analysis This means the process of identifying the need for a post		
	Job Description and Person specification This refers to assessing the requirements of the post and the competencies needed for the post		
	Advertising This refers to the use of appropriate advertising methods and media when recruiting		
	Selection process This covers panel composition, short listing, interview procedures and testing		
	Monitoring of recruitment and selection process means how we check that the way we implement the process is in line with our policy aim		
	Vetting and checking This covers reference checks, POCVA checks, medical checks, Permit to Work, Qualification checks and relevant external bodies, where appropriate		
	Other – please note		

9	<p>Are there any other issues or comments that you feel may not have been covered in the above question?</p>						
10	<table border="1"> <tr> <td colspan="2" data-bbox="569 602 1740 678"> <p>Do you know of any relevant research we could consider that may impact the above policy areas (both Care and Support and Recruitment and Selection) ?</p> </td> </tr> <tr> <td data-bbox="569 704 926 802">Care and Support</td> <td data-bbox="926 704 1740 802"></td> </tr> <tr> <td data-bbox="569 802 926 894">Recruitment and Selection</td> <td data-bbox="926 802 1740 894"></td> </tr> </table>	<p>Do you know of any relevant research we could consider that may impact the above policy areas (both Care and Support and Recruitment and Selection) ?</p>		Care and Support		Recruitment and Selection	
<p>Do you know of any relevant research we could consider that may impact the above policy areas (both Care and Support and Recruitment and Selection) ?</p>							
Care and Support							
Recruitment and Selection							
13	<p>Confirm contact details if necessary. (see checklist)</p>						
14	<p>Thank you very much for your time Close</p>						

Appendix C : Comments Received from Consultation with the Organisations Responses

Organisation	Summary of comments received	Association's response
Disability Action	Disability Action welcomes the offer of alternative formats, and requested that the Association lists the range available.	Clanmil advised Disability Action of this list. The range of alternative formats is listed in our EQIA on page 2. Clanmil would be happy to include any further recommendations Disability Action may have to this list if they feel it needs expanded.
	Disability Action recommend that a textphone number is included in the Association's covering letter.	The Association's headed paper includes the textphone number and is therefore available on any written correspondence. A copy of our letterhead was forwarded to Disability Action.
	Disability Action recommend that the recruitment and selection of Board Members fall under the scope of this EQIA.	After much consideration, in conjunction with the joint process Clanmil are taking part in with the Northern Ireland Federation of Housing Associations, it was felt that the recruitment and selection of Board Members fell under the area of Governance, which was not subject to an EQIA. Policies have been screened and there are no adverse impacts to the representation of the Clanmil Board.
	Disability Action recommend that our monitoring system include disability.	Clanmil do monitor disability and a copy of our monitoring form was provided to Disability Action.

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Organisation	Summary of comments received	Association's response
	Disability Action recommend Disability Awareness training to ensure that the essential/desirable criterion does not create an adverse impact on people with disabilities.	Clanmil provide Recruitment and Selection Training, and refresher training, to all those involved in the process, and this training has an emphasis on equality and the corresponding legislation. A copy of the course content for this training was forwarded to Disability Action. Disability issues are fully addressed within this training.
	Disability Action recommend that application forms are available in alternative format on all advertisements, and that there should be an indication of how they can be obtained.	At present this information is provided in the covering letter to an application pack and guidance notes, but not the job advertisement. We acknowledge that applicants should be aware of this at the earliest opportunity and will therefore make a commitment to amend our future job adverts by making this inclusion.
	Disability Action asked if selection methods are validated to ensure they do not have an adverse impact on disabled applicants.	Clanmil ask applicants to contact us if they require any special assistance to enable them to participate in the recruitment process. Any test set as part of the selection process is validated in terms of being job related.

Organisation	Summary of comments received	Association's response
		<p>However, we do accept that disabled applicants may find some tests difficult to complete, and as we have yet to come across this, we would welcome input from Disability Action on how we can ensure tests are validated to prevent discrimination. Clanmil have written to Disability Action for further assistance.</p>
	<p>Disability Action requested information as to how the application forms collect information relating to disability, so that any potential reasonable adjustments can be considered.</p>	<p>Clanmil's application monitoring form asks all applicants to state if they have a disability. Also, when applicants are invited to interview they are asked to contact our Personnel Department if they have a disability or require any special assistance to enable them to take part in the recruitment process. This information is also included in guidance notes for all applicants. A copy of the monitoring form and invite to interview letter were provided to Disability Action. This is the process for all recruitment of new posts. Clanmil would welcome any further adjustments to our procedure which Disability Action feel would be more beneficial.</p>
	<p>Disability Action recommend Disability Awareness Training for all interview panel members.</p>	<p>Recruitment and Selection Training places particular emphasis on equality and ensuring the prevention of discrimination against any of the 9 groups under S75.</p>

		Disability related issues are fully covered in this training.
Organisation	Summary of comments received	Association's response
	Disability Action raised the matter of the external auditor's background on equality legislation, in particular relating to disability.	Clanmil advised Disability Action that our external auditors are providing general feedback on the recruitment and selection process and adherence to procedures. The procedures have been screened to ensure compliance with disability and the 9 groups.
	Disability Action suggested a positive welcoming statement to disabled people.	Clanmil Housing has a general welcoming statement. However we have recently produced a policy on employing disabled people, and this is included with all job application packs.
	Disability Action recommended Disability Awareness Training for external consultants.	In selecting external consultants, it is a requirement in the letter of appointment that reference is made to disability awareness, and their experience thereof.
Equality Commission	Equality Commission recommends formal job descriptions and personnel specifications, and to ensure that criteria do not have any impact in terms of direct or indirect discrimination.	Each post within Clanmil has a specific job description and person specification. These are reviewed by the interview panel prior to any recruitment exercise. All recruitment panels are fully training on recruitment equality issues for the 9 groups.
	Equality Commission recommends regular training for those involved with recruitment and selection	All staff involved in recruitment panels are externally trained. All recruitment panels receive

	panels.	refresher training on a 3 yearly basis, or as the legislation changes.
Organisation	Summary of comments received	Association's response
	Equality Commission recommend that internal data gathering is carried out on an ongoing basis in order to monitoring the continuing impact of the policy.	Monitoring is carried out in line with monitoring guidance from the Equality Commission, namely the annual return and Article 55 review.
	Equality Commission point out that we may find it beneficial to draw up on research carried out by other organisation and in other jurisdictions.	Clanmil note this point and will look at secondary research for best practice.
	Equality Commission would welcome a list of the formal consultees engaged in this EQIA exercise.	A full list of consultee organisations re included at the back of the EQIA.