



Clanmil Housing Association

**HUMAN RESOURCES
DURING EMPLOYMENT**

Equality Impact Assessment

Final Document

February 2010

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If you would like an alternative format, please contact:

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

Tel:	}	028 9087 6000
Fax:	}	028 9087 6001
Textphone:		028 90 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 Human Resources (HR) Policies During Employment policy is:
To operate procedures set out in law, best practice and industry standards to:
- ensure effective and efficient management of associations;
 - comply with relevant statute;
 - ensure well-being of all staff
- whilst working to achieve organisational aims, objectives and mission statement.

This report provides the following information:

- Background information on the equality duties and Clanmil Housing Association
- A description of the Association's current HR During Employment policy areas
- Information on the scope of this review
- The sources of quantitative and qualitative data considered during the review
- Assessment of the impact of the policy on the 9 equality dimensions. This includes potential differential impacts based on disability and race
- Proposed mitigating measures

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- 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, Director of Corporate Services (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 During Employment policies were scheduled for assessment in year four 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 2100 units throughout Northern Ireland and over 180 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, both which were successfully reaccredited.

3. THE POLICY

Description of Policy

The HR During Employment policies describes the HR service the Association provides to its staff and the wider community.

Policy Aim

3.1 The aim of the HR During Employment Policy is:

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

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

while working to achieve organisational aims, objectives and mission statement.

The scope of the HR activities during employment covered in these policy areas include:

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

Underpinning objectives include:

- Meeting the resource needs of the business
- Effective management of staff

Scope of Review

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

Internal

- Staff
- Management
- Board members

There are also a range of other individuals or organisations that have an interest in Human Resources policies that apply during employment. This can be any of the following:

External

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

*Department for Social Development

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

** Equality Commission (EC) and Labour Relations Agency (LRA)

The EC for Northern Ireland and LRA carry out a compliance role and publish Codes of Practice to assist organisations to meet statutory obligations and best practice.

***Ombudsman

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

The lists shown under 3.2 are not exhaustive. These lists are in alphabetical order.

What this EQIA does not cover

- 3.3 We anticipate that some aspects of HR During Employment Policies 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 During Employment – This was covered by the Year 1 EQIA on Complaints
 - The HR Recruitment and Selection policies and procedures as these were covered in the Year 3 EQIA.
 - The training of Board Members
 - The specific HR policies of joint management partners and recruitment agencies
- 3.4 The HR During Employment policies are intrinsically linked to all of the Association's key policies and processes, depending on the nature of the service.

Legislative and Regulatory Requirements

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

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

This list is not exhaustive.

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

Reasons for Equality Impact Assessment

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

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

Implementation of the policy

3.8 The HR policies During Employment have been defined by the Association's Board and / or management team. They are implemented by relevant staff throughout the Association.

3.9 HR During Employment policy documents are developed in compliance with any legal requirement and agreed by Clanmil Housing's Board and Senior Management Team.

3.10 Clanmil Housing Association carries out the process of policy development in consultation with staff and through negotiation with their representative bodies, where appropriate.

3.11 Employee Relations

Clanmil Housing Association employee relations covers:

- Attendance
- Bullying and harassment
- Capability

-
- Disciplinary and grievance
 - Trade Unions
 - Staff Consultation/Briefing
 - Access NI/ Independent Safeguarding Authority

3.12 Terms and Conditions

In Clanmil Housing Association the contractual elements of the post covered under Terms and Conditions include:

- Equal Pay
- Grading
- Job evaluation
- Leave
- Pensions
- Salaries
- Working time procedures
- Minimum Wage legislation
- Fair Retirement Procedures

3.13 Performance Management

Delivering quality services requires competent, motivated and committed staff. Performance management is one of the tools Clanmil Housing Association uses to monitor and the contribution of the individual staff member and to assess whether they are meeting the set objectives. Our performance management policies cover:

- Appraisal
- Induction
- Probation
- Supervision
- Training – learning and development
- Capability
- Discipline and Grievance

3.14 Work-Life Balance

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

- Career breaks
- Flexi-time working
- Home working

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- Job share
 - Special leave
 - Paid Dependants and Extended Dependants leave
 - Term Time Working
 - Parental Leave
 - Enhanced Maternity / Paternity arrangements
 - Enhanced sickness absence payments

3.15 Health and Well-being

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

- Display screen equipment
- Drugs and alcohol
- Stress Management
- Risk Assessment
- Occupational Health
- Fleet Safety
- Maternity Risk Assessment
- Manual Handling
- Lone Working
- Control of Substances Hazardous to Health (COSHH)
- Infection Control
- No Smoking

4. CONSIDERATION OF AVAILABLE DATA AND RESEARCH

Sources of information

- 4.1 The following were used in considering available data relevant to the impact of the HR During Employment policy:
- a) Targeted pre-consultation meetings with representative bodies held during June/July 2009 as part of the joint exercise co-ordinated by NIFHA
 - b) Internal events to assess the impact of HR (during employment) policies held during April to July 2009.
 - c) A general pre-consultation exercise co-ordinated by NIFHA during July 2009.
 - d) The Association's internal management information on the profile of applicants and/or job leavers
 - e) Monitoring figures for the Association
 - f) Data collected for the Annual Regulatory Return to the DSD
 - g) 2001 Northern Ireland Census Data
 - h) Northern Ireland Research and Statistics Agency data
 - i) Data from benchmarking exercises
 - j) Staff surveys
 - k) Qualitative Feedback from staff during employment
 - l) Clanmil Housing Association's Service Review Surveys
 - m) Internal and external audits
 - n) Complaints and compliments register
 - o) Grievances about the association's HR practices
 - p) Information collated for monitoring returns
 - q) Equality Commission Codes of Practice
 - r) CIPD research
 - s) A Unified Guide to Promoting Equal Opportunities in Employment
 - t) General feedback to the association

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

Data collection

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

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- 4.3 Invitations were also made to and apologies received from Age Concern / Help the Aged, the Equality Commission, NICEM, NIACRO
- 4.4 NIFHA also invited all 142 organisations listed at Appendix 2 to participate in the pre-consultation using the policy documentation available at www.nifha.org or provided in hard copy on request. Interested organisations and individuals were asked to review the policy information and consider the following three issues:
- Do you agree with our assessment of impacts?
 - In terms of the group you represent have we missed anything?
 - Is there anything we could do to improve this policy for the group you represent?
- 4.5 Feedback from the pre-consultation work is meetings with organisations representative of Section 75 groups are shown at Appendix 1.

Profile of Employees

- 4.6 Clanmil Housing Association currently has appointed 21 staff during the period August 2008 – August 2009. All relevant monitoring returns were submitted.
- 4.7 At present, Clanmil Housing requests data on all 9 groups under Section 75. Following monitoring guidance from the Equality Commission ,in August 2008, the Association wrote to all employees outlining the responsibilities under Section 75. The Association advised employees that they were obliged to complete the gender and community background sections but that the remaining groups were voluntary: Date of birth; Dependants; Disability; Ethnicity; Marital Status; Political Opinion and Sexual Orientation.
- 4.8 81% of employees returned their monitoring form. Of those monitoring forms returned, the following table represents the how many staff answered under each of the 9 groups:

	% of employees who responded	% of employees who declined to answer
Community Background	100%	0
Date of birth	100%	0
Dependants	85%	15%
Disability	95%	5%
Ethnicity	96%	4%
Gender	100%	0
Marital Status	89%	11%

Political Opinion	77%	23%
Sexual Orientation	77%	23%

4.9 The profile of staff at that time was as follows (where a question was unanswered by staff it is noted):

Gender

Male	14%
Female	86%

Community Background

Protestant	65%
Roman Catholic	34%
Non-determinant	1%

Disability

No disability declared	77%
Question unanswered	23%

Marital Status

Single	12%
Married/civil partnership	52%
Divorced	7%
Separated	4%
Widowed	3%
Not answered	22%

Political Opinion

Nationalist	8%
Unionist	19%
Neither	38%
Unanswered	35%

Sexual Orientation

Different sex	61%
Same sex	4%

Unanswered	35%
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Dependants

Child/children	30%
Person with a disability	3%
Dependant older person	3%
No dependants	35%
Not answered	29%

4.10 At the same time (August 2008), the Association amended the monitoring form for applicants for employment in order to gather the same information.

4.11 Some statistics from the 2007 Northern Ireland Life and Times Survey in relation to the S75 categories are shown at Appendix A

4.12 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.

4.13 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.

Complaints (including grievances)

4.14 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, during 2008-2009, the Association has received

- no complaints about its HR During Employment policies that would indicate adverse impact arising from these policies
- There were three informal grievances about its HR During Employment service but none indicated adverse impact resulting from these policies

Staff Surveys

4.15 A staff survey carried out in 2006 -2007 showed that 92% of staff agreed or strongly agreed that they felt they had equal access to training and development opportunities relevant to their job. 61% of staff agreed or strongly agreed that jobs and promotions were based on merit.

The age profile of employees is analysed on an annual basis. The last exercise was carried out at the end of March 2009, which indicated 13% of employees in the over 65 age group. The Association's retirement policy encourages staff to work beyond retirement age, and this has seen an increase in the number of employees in this age group i.e from 8 in 2007 to 24 employees in 2009.

Ombudsman Report

4.16 There have been no ombudsman's complaints in relation to Clanmil Housing Association and the topic of the EQIA HR during employment.

Internal Audit

4.17 A full system review by Internal Auditors on HR During Employment procedures carried out in 2001 and reviewed in 2003 and a full audit conducted in 2009 highlighted no adverse impact in relation to the employment practices pre employment within Clanmil Housing Association.

4.18 A full review of HR During Employment procedures has commenced during 2009 and is tabled below:

CORPORATE SERVICE AUDITS 2009

February	CS010 - Flexi System CS015 – Attendance at Short Courses, Seminars, Conferences CS001 – Procedure for Sick Lines, Doctors Certificates, Hospital Certificates and Self-Certification Forms
March	CS012 – Monitoring for the Equality Commission CS002 – Termination of Employment
May	CS003 – New Starts, Vetting & Clearance
June	CS018 – Requests for Individual Training
July	CS021 - Translation Services
August	CS005 – Payroll Variations CS019 – Occupational Health Service CS017 – Requests for Group Training
September	CS020 – Evaluation of Training CS023 – Maternity Procedure
October	CS007 – Selection
November	CS024 – Risk Assessment Reporting

	CS031 – Worker Registration Scheme
December	CS004 - Inductions CS006 - Recruitment

4.19 The HR During Employment procedures which include all pre-employment procedures within Clanmil Housing Association are included in the ISO 9000:2000 quality accreditation. These procedures are all audited once yearly internally and periodically audited by external auditors SGS Yarsley ICS Ltd.

4.20 The last audit conducted by the external auditors on HR During Employment in June 2009 indicated no corrective action to be carried out.

General Feedback

4.21 There have been 6 RQIA reports during 2008-2009 and there were no adverse impacts highlighted.

4.22 Clanmil Housing Association was initially accredited with the Investors in People standard in 2005, and was re-accredited in November 2008 . Some comments from the auditor included ;

“they described clear policies on equality of opportunity and access to support and development” and

“all staff interviewed provided positive comments regarding their belief that managers throughout the organisation are fair and equitable in their approach to ensuring all staff have the same access to learning and development opportunities.”

4.23 Exit interviews are carried out with all staff when they leave the Association. A standard question within the exit interview asks if the employee feels that Clanmil are committed to equality of opportunity in relation to training and development. There were 34 leavers in the period April 2008 to March 2009, and from those leavers, there was no adverse impact identified at the associated exit interviews .

4.24 During the period April 2008 to March 2009, the Association received 14 requests for flexible working. Of those 14 requests, all 14 were granted.

4.25 At the 31st March 2009, 24 employees (13%) were over the national default retirement age.

5. ASSESSMENT OF IMPACT

5.1 This section outlines our assessment of the impact of the Association's HR during employment policy on the 9 Section 75 groups based on the evidence considered above.

5.2 The following points outline our preliminary assessment of adverse impacts arising from our HR during employment policies in relation to each of the nine groups.

5.3 **Age:** Having reviewed our policies, and the helpful comments from the Age Sector Platform, our initial assessment indicates Clanmil Housing Association's HR policies which apply during employment do not bring significant differential impact in terms of age.

5.4 The age profile of Association staff at 31st March 2009 is outlined in the table below:

Age Group	% and No. of employees at 31.03.09	Gender Breakdown
18 to 24	5% (9 staff)	8 female and 1 male
25 to 44	42% (76 staff)	63 female and 13 male
45 to 64	39% (70 staff)	59 female and 11 male
65 +	14% (26 staff)	23 female and 3 male
Total	100% (181 staff)	153 female and 28 male

5.5 **Dependants:** Our assessment of the available information suggests Clanmil Housing Association's policies do not result in significant differential impact for those with dependants as we offer a range of flexible options for employees. However, we recognise there may be some potential for improvement therefore we have included relevant proposals under mitigating measures (section 6).

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- 5.6 **Disability:** Our assessment of impacts did not result in identification of significant differential experiences for disabled people due to Clanmil Housing Association's HR policies during employment. However, our pre-consultation discussions with Disability Action did highlight a number of areas where improvements could be made, and we will be progressing these.
- 5.7 **Gender:** Our own research has highlighted gender imbalances. Figures for the year 2006-07 indicate that HAs employed just over 2500 staff. The gender split was 21% male to 79% female but at senior level this changes to 68% male and 32% female, this was reflected even further at Chief Executive level of the 38 posts at that time only seven were held by females. By early 2009 female Chief Executives represented 15% of the total for housing associations. As a result of this information we are exploring measures to mitigate this situation.
- 5.8 **Marital status:** Our research and consultation work have highlighted no significant differential impact in terms of marital status resulting from Clanmil Housing Association's HR policies during employment
- 5.9 **Political opinion:** This has not been statistically measured but no issues have been raised during consultation that indicate Clanmil Housing Association's HR policies during employment lead to adverse impact on the grounds of political opinion.
- 5.10 **Racial Group:** Our research and consultation work suggest Clanmil Housing Association's HR policies during employment do not cause significant adverse impact for those from different racial groups. However, the individual's ability to communicate in English was highlighted by the Multi-Cultural Resource Centre as a significant factor for both employment and career progression.
- 5.11 **Religious belief:** No issues have been raised during consultations which indicate Clanmil Housing Association's HR policies during employment result in significant differential impact because of religious belief.
- 5.12 **Sexual orientation:** Our research and consultation work did not highlight any significant differential impacts relating to sexual orientation which resulted from Clanmil Housing Association's HR policies during employment. The Rainbow Project made a number of useful suggestions for improvements.

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- 5.13 Many of the issues raised during pre-consultation highlighted concerns around Access & Communications in relation to services rather than specifically to HR during employment. Access & Communications was addressed as part of the associations' Year 1 EQIAs. As a result the majority of the concerns mentioned by respondents were either covered by the Mitigating Measures proposed at that time or have been identified for action as part of that process. Nevertheless, this is an important consideration and as such is kept under review so some of the Mitigating Measures listed are intended to improve accessibility.
- 5.14 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.
- 5.15 Where we indicate that there is no evidence of adverse impact, this does not mean that no action will be taken. The Association is committed to promoting equality of opportunity for all and excellence in customer service, and will seek, where possible, to put measures in place to ensure that all sections of society have an equal opportunity to access appropriate redress when problems occur.

6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following are options that could potentially mitigate adverse impact arising from the HR During Employment policies:

- Continue to offer a range of flexible working options to make posts more suitable for those with caring and family commitments (ongoing)
- Consider the use of 'Welcome' statements to redress under-representation in the various categories of the 9 groups (as identified under represented groups are advertised).
- Carry out employee updated attitude survey which details issues in relation to HR policies during employment in 2009-2010 (May 2010).
- Undertake further quantitative and qualitative analysis of employees leaving the association (ongoing)
- Annual review of policies subsequently authorised at Management Team level (ongoing)
- IIP re-accreditation (November 2011)
- Ongoing diversity awareness training for all recruitment panel members (training refreshed 3 yearly for all involved)
- Reflecting diversity in the panels (as and when appropriate)
- Highlight the fact that applications / HR policies and procedures can be made available in different formats (policies updated February 2010 to advise of this)
- Advertise in specific press to encourage disabled applicants
- Disability – keep under review accessibility issues/language/disability etc
- Involve staff for consultation when drafting new policies during employment (ongoing)
- Proactively take advice from external bodies such as the Labour Relations Agency when drafting or amending policies which may have the ability to be discriminatory (ongoing recent examples completed 2009)
- Promotion of equality issues internally with staff through events, activities and promotional weeks (ongoing through 2009/2010).
- Review the Harassment Procedure to make specific reference to the comments raised by the consultee groups (February 2010)
- Develop and Publish a Domestic Violence Policy (February 2010)
- Introduce an information pack for those staff who are retiring to sign post them in the right direction for advice (April 2010).
- Proactively take part in high profile “awareness” weeks to raise equality awareness of the specific issues faced by the 9 groups
- Update the annual staff declaration forms to gather more up to date information on staff in relation to developed disabilities (November 2009)

7. CONSULTATION

- 7.1 Clanmil Housing Association has endeavoured to give careful consideration to the measures that might be taken to make the HR During Employment 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 Association will ensure that it consults effectively with those groups directly affected by its HR During Employment policy, and their representatives.
- 7.3 Staff will be available to discuss these proposals in person, by telephone, or by e-mail, as requested. Visual aids will also be used where appropriate. Meetings may also be arranged to discuss the way forward and the Equality Impacts of this document, if required.
- 7.4 The period of consultation will end on Friday 18th December 2009.
- 7.5 Comments in relation to this report should be submitted in the first instance 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 including:
Email: housing@clanmil.org.uk
Phone: 028 9087 6000
Fax: 028 9087 6001
Textphone: 028 9032 9914
In person: Northern Whig House, 3 Waring Street, Belfast, BT1 2DX.
- 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 Association 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

Northern Ireland Life and Times Survey 2007

Political Attitudes

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

	%
Unionist	36
Nationalist	24
Neither	40
Other	0
Don't know	0

Gender of Respondent

	%
Male	49
Female	51

Marital Status of respondent

	%
Single, that is never married	27
Married and living with husband/wife	59
A civil partner in a legally recognised Civil Partnership	0
Married and separated form husband/wife	4
Divorced	4

Widowed	6
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Dependants

Does the respondent have any children aged 16 or under (living or not living with them)?

	%
Children 16 or under	31
No children 16 or under	69

Sexual Orientation

	%
I am gay or lesbian (homosexual)	1
I am heterosexual or straight	98
I am bi-sexual	1
I do not wish to answer this question	1
Don't know	0

Race/Ethnic background

To which of these groups do you consider you belong?

	%
White	1164
Black	3
Asian	7

Chinese	1
Mixed (please specify)	1
Other (please specify)	1
None of these	1

Do you consider yourself to be a member of a minority ethnic community?

	%
Yes	4
No	96
Don't know	0

Appendix 1: Consultee comments pre-consultation

Organisation	Summary of comments received	Association's response
Age Sector Platform (ASP)	2006 research shows 9.6% of men aged 65+ in employment and 11% of women aged 60+ in employment – would be interested in profile of staff falling into these categories.	At the end of March 2009, Clanmil employed 20 females over 60 and 3 males over 65, which represented 13% of the total workforce.
	Emphasis on choice in terms of retirement – talk of pension age being increased and they would not like to see people forced to work longer. Should be a choice and whether the person is still capable of doing the job.	Clanmil operate a Fair Retirement Policy, with the choice for retirement with the employee. Clanmil would agree that this choice should not be taken away.
	Statistics around people over 50 years old – more likely to still be seeking employment after 2 years than those under 50 years old.	Clanmil have noted the comment.
	Consider the panels used in recruitment – consider panel members over 50 years – sends out a message to applicants – even an observing role.	Clanmil recruitment panels are comprised of the most appropriate person to recruit the post. We would not have sufficient staff to have someone over 50 on each panel.
	Do associations monitor appointees and current staff in relation to their age?	Clanmil proactively monitor all staff and appointees in relation to age. This information is continually reviewed and considered annually by the Board of Management of Clanmil Housing.
	Consider that as people get older, they may like to wind down and get ready for retirement – can they be considered for flexible working requests (albeit there is no legislation on this but in terms of good practice) by considering reduction in hours/phased working.	Clanmil have actively facilitated flexible working requests from employees that do not fall under the statutory right to request flexible working.
	Ageing population – living longer, in better health and growing in size. Need to be aware of what they can contribute.	This comment is noted and a fundamental core message to the work of Clanmil Housing. Clanmil are proactive in leading an active aging programme for all tenants in our independent living schemes.

Organisation	Summary of comments received	Association's response
	Termination of employment – when people leave, particularly retirement – why not have an information pack for them to include details of support or resources which highlights the range of groups out there which seek to encourage active ageing. Could consider this as part of exit interview – try and support staff the way you would do in a redundancy situation.	Clanmil consider this an excellent idea and have commenced work on this. This will be implemented by December 2009.
Age Sector Platform (ASP)	Could extend use of packs, not just to those retiring, but in the case of people leaving due to ill health or bereavement etc	
	“Granny leave” – so many people rely on parents for childcare. Impact on employers.	Clanmil has granted flexible working arrangements for staff who have caring responsibility for grandchildren. Clanmil will include unpaid “granny leave” in its worklife balance package, but has no plans for “paid” leave at this point in time.
Carers NI (CNI)	Availability of flexible working is important for carers	Clanmil Housing actively promotes flexible working. Within our worklife balance package we have paid carers leave to facilitate caring responsibilities and extended carers leave
	Access to promotion or other benefits should be the same for those on career breaks or in part-time working – the policy shouldn't depend solely on the manager	Opportunities for promotion are based solely on merit and are communicated to all staff, including those on career break, maternity/paternity, job sharing, long term sickness absence etc.
	The two main blocks to carers taking up promotion are: 1. availability of good reliable care services 2. attitude of 1 st line manager (need to be trained, aware, positive)	Clanmil have proactive policies and procedures to support those with caring responsibilities. All line managers are trained in supporting staff.
Disability Action (DA)	Give consideration to the inclusion of a Textphone number within the list of alternative formats for those with a hearing impairment	Clanmil have included the textphone number on all alternative formats and publications.

Organisation	Summary of comments received	Association's response
	DA commented the alternative formats were likely to suffice in terms of covering the needs of those with disabilities / different races however some of the other groups may have suggestions too	Clanmil have noted the comment
	'Access & Communications' were not covered by this EQIA. DA commented that whilst this was dealt with previously, these issues were cross cutting within employment matters and would therefore need to be considered again in the employment context	The issue of access and communications was fully considered in a previous EQIA and underpins all access and communication issues in relation to HR policies during employment.
	'Recruitment & Selection' is not covered by this EQIA. Again DA commented that whilst this was dealt with in year 3, Associations should be reviewing the impact of this exercise. In terms of issues raised and follow up action, organisations which identified a under representation of staff with a disability should now be trying to identify if anything has since changed	This comment is noted. Clanmil have actively re - monitored all staff during 2008-2009 following the EQIA on recruitment and enhanced the feedback to the Association of applicants for employment.
Disability Action (DA)	'Training of Board members/HR policies of Joint Management partners etc' is not covered by this EQIA. DA reminded Associations that current disability legislation protected and promoted the rights of disabled people to participate in public life. Urged Associations to think about which EQIA will cover these specific circumstances if it isn't 'HR in employment'	Clanmil actively promotes the participation in public life through its composition of the Board of Management and Tenant Forum. During 2008-2009 all Board members and tenant forum members will be surveyed to ensure statistics held on the 9 groups are up to date, where provided.
	Suggested that the Human Rights Act should be included in list of legislative/regulatory requirements	This has been included.
	On Performance Management, DA suggested Associations need to be thinking about the training which they are providing to staff on disability issues during induction and beyond	Clanmil have a robust programme of training on disability issues which are scheduled annually and ongoing for all relevant staff. A full list of these disability related training events are included within our

		annual disability action plan.
Organisation	Summary of comments received	Association's response
	<p>Under 'sources of information', DA suggested Associations needed to look at their own monitoring figures and ask the following two questions,</p> <ol style="list-style-type: none"> 1. Are disabled people applying to our organisation? If not, why not? 2. If disabled people are applying, are they successful in securing employment? If not, why not? <p>DA proposed that the Recruitment & Selection EQIA should have identified the need for collating and reviewing this information. DA suggested that if Associations were still not doing this then now was the time to be taking action to redress this.</p>	<p>This comment is noted. Clanmil Housing do monitor the composition of the applicants and successful appointees for employment. Clanmil include a welcoming statement on all publically advertised posts. We will keep this under review.</p>
	Recruitment processes can impact on 'in employment' issues e.g. under-representation of disabled people can be made worse by strategies on promoting internally or use of the internal trawl	<p>All permanent employment positions are advertised externally.</p>
	In relation to staff surveys DA urged Associations to think about whether their organisation was a 'safe' organisation in which to declare a disability.	<p>These questions were considered to some degree in staff survey in 2006-2007. 92% of staff agreed or strongly agreed that there was equal access for all in relation to training and development opportunities.</p>
Disability Action (DA)	Do staff feel comfortable sharing this information or do they fear repercussions for security of employment/career development	<p>This comment is noted. Clanmil will be updating and reissuing the staff survey during 2009-2010 and will include a specific question which deals with this issue.</p>
	Suggested merit in regularly asking the question on disability, not only at recruitment stage, but throughout employment as this is an issue which can change from year to year within a staff team.	<p>Clanmil resurveyed all staff in line with the 9 categories in 2009. We will now commit to including a disability question on the annual staff declaration form.</p>

Organisation	Summary of comments received	Association's response
	DA suggested staff focus groups could give good feedback on above point and stressed the importance of qualitative as well as quantitative information	Views will be sought from staff focus groups in relation to how approachable they feel Clanmil Housing are to making reasonable adjustments and assisting staff.
	Following on from this issue of whether people felt safe declaring a disability during employment, DA urged some caution on the figures of complaints. Suggested that no complaints could still signal a problem particularly if the organisational culture meant that staff did not feel that they could raise a complaint or that it would be dealt with appropriately.	This comment is noted. We will aim to ask this question in the staff surveys this year, which are confidential to staff.
	With regards to using feedback from inspections and accreditation processes for IIP & ISO etc, DA suggested these inspection reports should be reviewed in terms of disability issues raised or recommendations made. Also suggested that associations should review our systems for self assessment, recording actions to be taken and implementing those recommendations.	Clanmil will actively seek advice from Disability Action in the area of assessment. Any suggestions or areas for improvement identified through the audit system are fully considered and largely implemented.
	Implementation of. DA reminded Associations that guidance regarding extension of monitoring duties has been out some time and implementation is required to meet the duties under S75.	Clanmil Housing are fully compliant with the best practice monitoring guidance produced by the Equality Commission for Northern Ireland.
	Suggested Associations contact DA's Human Resources Dept with regards to the specific details of proactive HR policies, procedures and initiatives.	A representative of the Human Resources Department will be invited to the Human Resources Forum to assist with reviewing proactive policies within Clanmil. Clanmil previously had advice at this Forum from Disability Action in relation to recruitment and selection.

Organisation	Summary of comments received	Association's response
Disability Action (DA)	<p>DA's suggested measures to mitigate against adverse impact. Included:</p> <ol style="list-style-type: none"> 1. Use of Supported Employment placements 2. Consideration of special schools when school placements are being considered 3. Use of a welcoming statement where there is an under-representation of disabled people 4. Ensuring disability related hospital appointments/treatment was not recorded as sick leave 5. Updating and evaluation of disability awareness training 	<p>Clanmil have supported an employment placement with Orchardville Society for over 8 years.</p> <p>Clanmil will consider active approaches to special schools for work placements.</p> <p>Clanmil use a general welcome statement for all 9 groups but will consider this specifically for under representation, where appropriate.</p> <p>Clanmil do not record disability related appointments and treatment in sickness absence statistics.</p> <p>Clanmil provide induction training and a programme of annual training in relation to disability issues. All training sessions are evaluated.</p>
Gingerbread	Would oppose age limits related to applying for flexible working.	Clanmil do not operate any age restrictions on staff requesting flexible working and have facilitated flexible working requests from staff of all ages and for various reasons.
	Concerns about ability of Housing Associations to be flexible in respect of time off during school summer holidays	<p>Clanmil have a policy of term time working and one staff member to date has availed of that.</p> <p>Our flexible working policy allows staff on a daily basis to vary their start and finish times which helps with childcare arrangements.</p>
	Concerns re: childcare, i.e. access to it, affordability and quality.	This comment is noted.
	Noted it can be more economically viable for a lone parent not to be in employment, particularly if they are getting the minimum wage	This comment is noted. Clanmil do not have any posts currently paid the minimum wage.
	When in employment, lone parents may have to leave due to financial difficulties and go back on benefits	This comment is noted.

Organisation	Summary of comments received	Association's response
	Would like to see Flexible Working/Family Friendly policies	Clanmil have a very proactive approach to worklife balance, and have an award winning package of benefits which staff can avail of which includes paid carers leave and extended paid carers leave, enhanced annual leave, flexi hours for staff, term time working, career break policy, a day off for your birthday/that of a child.
	Would like to see Childcare Initiatives (Gingerbread is aware that whilst childcare vouchers are good idea in theory, they are mainly not in practice due to the lack of childcare on the ground)	On several occasions, Clanmil have marketed the childcare voucher scheme to staff. To date there has been no uptake, however we intend to relaunch it during 2009-2010.
	Be sensitive to domestic violence – skill HR people to sign-post if faced with a disclosure (Woman's Aid)	Clanmil is currently developing a Domestic Violence Policy for staff. We have committed to supporting a conference at our premises by Women's Aid in February 2010 through Business in the Community on this subject.
	Be sensitive to employees counselling needs during working hours	Clanmil will refer staff for paid counselling sessions for all staff, which can be availed off during working time.
	For performance management – each case to be reviewed on an individual basis, taking account of the person's circumstances	The performance management process and appraisals within Clanmil always take account of the circumstances of an individual staff member. All staff receive training specific to appraisal and line managers receive enhanced training in relation to this.
	Ensure employees have access to information on benefit entitlement (lone parents in work are not always fully aware of additional allowances whilst in work)	This is an area which I feel we could enhance and would be keen to do so. Clanmil will contact Gingerbread for additional advice.

Organisation	Summary of comments received	Association's response
	<p>Useful Statistics</p> <ul style="list-style-type: none"> • 25% of families are headed by lone parents • 92,000 lone parent families in N Ireland, incorporating 150,000 children • 90% of lone parents are lone mothers • 56% of lone parents are in work 	These updated statistics are welcomed.
	In the late 90's government set itself a programme of welfare to work and the target was to have 70% of lone parents in work by 2010. OFMDFM carried out research in respect of how to get a further 14% of lone parents into employment. It was reported that 10,000 jobs would be required and 30,000 childcare places – an impossible target	This comment is noted.
Multi-Cultural Resource Centre (MCRC)	The biggest issue for people from another country is often language. Most do not have English; as a result their employment options are limited.	This comment is acknowledged. Clanmil have actively reviewed all person specifications for posts and have clearly identified where English is essential but also have produced pictorial working procedures where we have identified that English is not essential to assist employees in employment where English is not the first language.
	Cost of courses may be prohibitive for those in low paid jobs so they cannot improve their language skills which in turn reduces employment / career progression options (e.g. BIFHE course is £106	Clanmil would fund an essential skills training course for an employee of whom English was not the first language.
	Government needs to offer support by helping people access classes that will enable them to integrate	This comment is noted, but is outside the remit of Clanmil Housing.
Rainbow Project	Review the paternity arrangements to ensure inclusivity. Suggested wording "child in your care"	This comment is noted and the wording has been amended.
	Review the wording in the policy	This comment is noted. The

	for “maternity” and clarify that it is the main person responsible for providing the childcare	Clanmil maternity policy has been amended.
Organisation	Summary of comments received	Association’s response
	Review adoption procedure to ensure inclusive wording	The adoption policy has been reviewed and amended.
	Ensure if “marriage” leave is provided it includes Civil Partnerships too.	This comment is noted. The Clanmil policy on “marriage” leave also includes “civil partnerships”.
Rainbow Project	Issues around allocation of points for housing in intimidation based on sexual orientation	This has been referred to the Housing Department for consideration.
	Ensure literature is proactive and inclusive language in policies used to promote equality	Corporate Literature is designed to be representative and inclusive.
	Consider specialised training in issues faced by those of different sexual orientation	Clanmil currently provide training on all 9 equality groups, but will consider training specifically for issues faced by those of different sexual orientation.
	Look at monitoring key stakeholders in terms of sexual orientation	Clanmil introduced proactive monitoring for sexual orientation of Staff and Board members during 2009-2010.
	Review Harassment procedure and ensure specific reference is made to “Hate Crimes”	Harassment Procedure is currently being updated and will reference “Hate Crime”.
	Recommendation to draft a Policy for Domestic Violence and include all relationships in this.	This is currently being drafted and will refer to all relationships, including same sex couples.
	Ensure Harassment procedures refer to harassment incidents outside the workplace at social gatherings	This is currently included.
	Consider speaking to Lesbian and Gay Older Peoples Network to assess any issues across two of the 9 groups.	Clanmil are keen to progress this issue and intend to invite a representative from this organisation to speak at a scheduled Human Resources Forum.
Women’s Support Network	Suggested promotion flexible working to the male workforce as traditionally women take up most	The Clanmil worklife balance package is open to all employees and male employees

(WSN)	requests.	have availed of the benefits, although it is noted that the majority of staff applying would be female.
Organisation	Summary of comments received	Association's response
	Access to childcare is a big issue for working mothers – no childcare strategy/infrastructure in place.	This comment is noted. Clanmil have been actively promoting the childcare voucher scheme and have introduced flexi working and policies such as term time working to try to assist staff in childcare management.
	Women may put off having children because of a fear of how it will affect their career, but later encounter fertility issues.	This comment is noted. Financially, Clanmil provide an enhanced maternity and paternity pay package for all staff.
	Transport infrastructure does not always enable women to manage childcare/work.	This comment is noted.
	Future Government changes may force mothers off income support and into work when their children reach 12 years old. Impact of this for women – need retraining and / or re-education as well as somewhere for their children to go.	This comment is noted.
	Employers for childcare – voucher scheme to assist parents in work with childcare.	Clanmil have actively marketed this scheme on three previous occasions but there has been no uptake by staff. Clanmil intend to reintroduce the concept during 2009-2010.
Women's Support Network	Employers for childcare have also been instrumental in helping employers start up crèche facilities – may wish to consider this as an umbrella group.	Clanmil would be willing to consider the implications of this if there was sufficient interest from the Housing Association movement, co-ordinated through our umbrella organisation, NIFHA.
	"gender segregation" within the workplace - where there still might be jobs, particularly lower paid, that would be predominantly female, with no obvious route for progression; suggested that	Clanmil take training and development of all staff seriously and have invested in an NVQ structure for staff in care roles.

	employers should perhaps target these groups with their training programme to provide a chance for development that would allow them to move away from these roles into others with more chance for progression.	
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Appendix 2 – Equality Consultation List

Revised July 2009

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

Cookstown District Council
Council for the Homeless (NI)
Craigavon Borough Council
Democratic Unionist Party
Department for Social Development
Derry City Council
Derry Well Woman
Disability Action, Belfast
Disability Action, Derry
Down District Council
Down's Syndrome Association
Dungannon & South Tyrone District Council
East Belfast Community Development Agency
Eastern Health & Social Services Board
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh District Council
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Help the Aged Northern Ireland
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Larne Borough Council
Lesbian Line
Limavady District Council
Lisburn Borough Council
Magherafelt District Council
Magherafelt Women's Group
MENCAP
Methodist Church in Ireland
Mind Yourself
Moyle District Council
Multi-Cultural Resource Centre
Newtownabbey Borough Council
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
North Down Borough Council
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Care Trust
Northern Health & Social Services Board
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health

Northern Ireland Committee for Refugees & Asylum Seekers (NICRAS)
Northern Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Housing Council
Northern Ireland Housing Executive
Northern Ireland Human Rights Commission (NIHRC)
Northern Ireland Mixed Marriage Association
Northern Ireland Office
Northern Ireland Women's Aid Federation
Northern Ireland Women's European Platform (NIWEP)
Northern Ireland Youth Forum
NUS USI
Office of the First Minister & Deputy First Minister
Omagh District Council
Omagh Women's Area Network
Parents & Professionals & Autism
POBAL
Polish Welfare Association
PRAXIS
Press for Change
Probation Board for Northern Ireland
Progressive Unionist Party
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
SEEDS
Sense NI
Simon Community
Sinn Fein
Social Democratic & Labour Party
Southern Health & Social Care Trust
Southern Health & Social Services Board
Staff Commission for Education & Library Boards
Strabane District Council
Supporting Communities NI
The Cedar Foundation
The Guide Dogs for the Blind Association
The Rainbow Project
The Women's Centre
Traveller Movement Northern Ireland
UCATT
Ulster Democratic Party
Ulster Scots Heritage Council
Ulster Unionist Party
Western Health & Social Care Trust
Western Health & Social Services Board

Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency (WRDA)
Women's Support Network
Workers Party
Youth Action
Youth Council for NI

Appendix 3: Consultee comments post-consultation

Organisation	Summary of comments received	Association's response
Disability Action	In relation to the information on alternative formats and the Chief Executive's contact details, please see our comments at paragraph 7 above.	The textphone number is included.
	The outline of the policy is clear and concise.	Noted
	Disability Action commends the reasons presented for carrying out an EQIA on this policy.	Clanmil appreciate the positive comment.
	We also commend the use of the pre-consultation techniques.	Clanmil appreciate the feedback on this.
	The table showing the percentage of forms returned does not give consultees any relevant information on which to respond. The Association should provide information on the numbers or percentages for staff in each of the S75 categories.	The Association accepts this comment and has included a profile of staff in relation to the S75 categories at 4.9.
	As Disability Action has no data on which to consider issues of equality, we cannot comment on the assessment of impact. We believe this should be rewritten to provide the data on which we can make comment (paragraphs 5.1 – 5.11).	The equality data on the profile of our staff is now included at 4.9.
	Disability Action that advised that data on religion can be used as a proxy for political opinions (paragraph 5.8).	Unless designated and answered by the employee, the Association will not assume political opinion.
	Mitigating measures section – should be re-written to clearly indicate what mitigation the Association intends to put in place and an associated timetable.	This has been noted and timetable included

	We believe measures should be in the first instance definite and exhaustive (paragraph 7.1).	The Association has considered Disability Action's comment but we believe that the measures listed should not be definite or exhaustive, as we welcome the opportunity to add to those mitigating measures at any time.
Organisation	Summary of comments received	Association's response
	Include methods of communication with deaf people	We have included reference to visual aids
	In relation to the contact details for the Chief Executive, please see our relevant comments at paragraph 7 above.	Text phone number included.
Womens Support Network	It would be useful in an Equality Impact Assessment to include gender disaggregated data of different categories of women.	Clanmil will commence a statistical review of the information we hold currently during March 2010.
	WSN recommends similar positive measures to advertise in the press to encourage female applicants to apply for senior positions.	There is no under representation of females in the Clanmil Senior Management team.