



Clanmil Housing Association

HOUSING MANAGEMENT

Equality Impact Assessment

Consultation Document

July 2007

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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 Housing Management policy is:

To provide an efficient, effective and equitable housing management service in the interests of the Association, its tenants and the wider community (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 Housing Management 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 Clanmil Housing Association (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 Housing Management policy was scheduled for assessment in year two 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.

About Clanmil Housing Association

2.8 Clanmil Housing Association was established in 1977. Clanmil Housing Association is a Registered Housing Association registered with the Department for Social Development and holds charitable status with the Inland Revenue. It is a voluntary non-profit making organisation. Historically Clanmil built and managed only sheltered accommodation for older people, and now provides general needs housing, housing for people with disabilities and special needs through supported housing, housing with care.

2.9 Clanmil's Mission Statement is : Clanmil Housing aims to be a primary provider of high quality homes at the lowest possible economic rent for everyone in housing need. It is committed to providing an open and professional service, which is all embracing and sensitive to the needs of the individual'

2.10 The Board of Management of Clanmil comprises of a maximum of 15 appointed members, including a Chairperson. The Board of Management reflects a range of interests, including two tenant representatives.

The current membership is:

Chair	-	Geraldine Rice
Vice Chair	-	Gareth Johnston
Member	-	Derek Rankin
Member	-	Joan Baird
Member	-	Jim Browne
Member	-	Geraldine Cunningham
Member	-	Jennifer Ebbage
Member	-	CT Hogg
Member	-	Stewart Kirkwood
Member	-	Will Linton
Member	-	Mary O'Boyle
Member	-	John O'Brien
Member	-	Carol Ramsey
Member	-	Maura Riordan
Member	-	Mildred Shiells

Tenant Representative members Will Linton
Des Long.

3. THE POLICY

Description of Policy

The Housing Management policy describes the housing management service the Association provides to its tenants and the wider community.

Policy Aim

3.1 The aim of the Housing Management Policy is:

To provide an efficient, effective and equitable housing management service in the interests of the Association, its tenants and the wider community, whilst operating within available resources.

The scope of the housing management activities covered in the policy include:

- **Commencing and terminating tenancies** – This covers how tenancies are signed up and procedures for ending them.
- **Compensation** – This refers to payments tenants may be entitled to, e.g. redecoration allowances when repairs are carried out.
- **Local area services** – This means how we manage housing estates e.g. making sure they are kept clean, and safe.
- **Manage neighbour nuisance and anti-social behaviour** – This covers how we deal with reports of nuisance and anti-social behaviour caused by, or affecting our tenants.
- **Rent collection** – This covers how we collect rent and recover arrears from tenants.
- **Tenant participation** – This means how we seek to encourage tenants to get involved in planning services and in the management of the Association
- **Tenancy management** – This includes policies in relation to right to succession, sub-letting and lodgers.
- **Void Management** – This refers to how we manage empty properties

Underpinning objectives include:

- Consistency
- Continuous improvement
- Good management
- Maintaining good community relations
- Providing satisfaction to stakeholders

Scope of Review

3.2 The main stakeholders in relation to the policy include anyone seeking access to the Association's housing management service or any other stakeholder of the Association. This can be any of the following:

External

- Applicants for housing
- Current tenants
- DSD
- Elected representatives
- General public
- Inspection and assessment bodies
- Leaseholders
- NIHE
- Other Housing Associations
- Other statutory agencies
- Partners or providers of Housing Support Services
- Past tenants
- Recognised tenant organisations
- Representatives of the local community
- Residents of agency managed supported housing schemes
- S75 representative groups
- Suppliers

Internal

- Board members
- Management
- Staff

Beneficiaries

Residents / Tenants
Tenants Associations

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 housing management.

Inspection and Assessment bodies

There are also other bodies that can look at aspects of the Association's housing management service.

Ombudsman

Anyone dissatisfied with the way in which the Association carries out its housing management 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 deal with third parties when reviewing the Association's Housing Management policy.

Any organisation providing services on behalf of the Association would be expected to comply with the policies of the Association.

The above list is not exhaustive.

What this EQIA does not cover

3.3 We anticipate that some aspects of housing management 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:

- **Allocations** - All Housing Associations are required to allocate properties including transfers in accordance with the rules of the Housing Selection Scheme (HSS). This is the statutory scheme for the management of the social housing waiting list used in the allocation of all social housing. The Housing Selection Scheme is a policy of the Northern Ireland Housing Executive (NIHE) and is approved by the DSD. All social landlords within Northern Ireland must use this scheme to allocate new tenancies. As the statutory authority with ownership of this policy the NIHE have conducted an EQIA on the HSS. NIFHA and the associations participated in this EQIA as consultees. A final report was published in July 2007. For these reasons allocations will not form part of this EQIA exercise.

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- **Complaints about Housing Management** – This was covered by the Year 1 EQIA on Complaints
 - **House Sales** - This is a statutory scheme owned by the Department for Social Development. In response to their consultation NIFHA submitted a comprehensive reply on behalf of the housing associations.
 - **Housing Support services** - This will be covered in a separate EQIA.
 - **Setting rents and other charges** - This will be covered in a separate EQIA

3.4 The Housing Management policy is intrinsically linked to all of the Association's key policies and processes, depending on the nature of the service. These include:

- Access and communications
- Allocations
- Arrears Collection
- Care and Support
- Complaints
- Corporate
- Development
- Finance
- Governance
- House Sales
- Human Resources
- Maintenance
- Rent and Service charge policies

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 Housing Management service provision:

- Judgment Enforcement Rules (Northern Ireland) 1981
- Housing (NI) Order 1983 (introduced the right of Secure Tenant
- Social Security Claims and Payments Regulations (Northern Ireland) 1987
- Housing (NI) Order 1992 (This introduced the Tenants Guarantee)
- Social Security Administration (Northern Ireland) 1992
- Disability Discrimination Act 1995
- Section 75 of the Northern Ireland Act 1998

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- DSD Regulatory Framework (2004)
 - Housing Order NI 2003 (Introduced specific powers to tackle Anti-Social Behaviour and introduced Introductory Tenancies, use of injunctions and extended the grounds for possession)
 - Housing Benefit Regulations for Northern Ireland 2006

This list is not exhaustive.

3.6 In addition to housing management generally, Clanmil Housing Association 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 Housing Management 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 set a more efficient standard throughout the Housing Association sector.
- (b) The Association believes that access to services, including housing management, is of high importance to S75 groups.
- (c) Clanmil Housing Association also believes that its Housing Management 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 Housing Management policy has been defined by the Association's management team. It is implemented by all staff throughout the Association. The key aspects of the current policy are presented below.

Standards

- 3.9 Housing Management Policy documents are agreed by Clanmil's Management Team, in consultation with staff, Tenant Forum and the Board as required by the DSD and in compliance with any legal requirement.
- 3.10 Clanmil Housing Association provides accommodation for people with a variety of housing needs developed in areas where housing need has been identified by the NIHE and (where possible) these homes are built to a lifetime homes standard. As the statutory housing authority the NIHE is responsible for collecting data and identifying housing need and supporting the Association in the delivery of the housing development programme.

Commencing and Terminating tenancies

- 3.11 Clanmil has a standard procedure in place that staff are required to follow at the commencement of each new tenancy. Every tenant is provided with a new tenancy pack containing documents and information relevant to the tenancy.

The Tenancy Agreement is a legal document and sets out the terms of the Tenancy together with the obligations on both the landlord and the tenant. Housing staff explain the terms of the tenancy to the tenant. This information is available in a different format or language as required by the individual tenant to ensure their understanding of their legal obligations under the terms of the tenancy.

A standard checklist is completed by the staff member of information provided or explained to the tenant.

Clanmil Housing also provides pre tenancy training for tenants in new housing developments. New tenants for new developments are required to attend the "Getting to Know You" event prior to moving into their new home. The purpose of the event is to discuss directly with new tenants the responsibilities of both landlord and tenant to the agreement, to increase awareness and develop good relations with each party to the agreement and between tenants, and to provide a vehicle to good start community involvement and tenant participation. Each tenant in sheltered housing is provided with a detailed induction programme to welcome them into their new home. All new tenants are called by telephone within 6 weeks of moving into their new home to

check if there is anything Clanmil can do to assist them and if any action is required this is followed up accordingly.

In accordance with the terms of the tenancy conditions, every tenant is required to provide 4 weeks notice of their intention to end the tenancy. Whenever the Association is made aware of an impending termination a procedure is in place which is followed by staff to bring to an end the tenancy and re-let the property.

Evictions may only be carried out in accordance with primary legislation set out in Schedule 3: Housing (NI) Order 1983. Only when the procedure and process are judged to be fair and in accordance with the conditions of tenancy and law, can a possession order be granted by the Court. An eviction is enforced through due process by the Enforcement of Judgements Office. All associations must follow this process.

Compensation

- 3.12 In some circumstances tenants may claim compensation from the Association including for payments for redecoration, and for damage to their property or belongings. For compensation claims not exceeding £1000 and where the Association accepts responsibility for the damage this may be paid in certain specified circumstances as set out in the policy. For other claims the Association will refer the matter through to the Association's insurance brokers and or legal advisors.

Local area services

- 3.13 Clanmil provides offices at Northern Whig House in Belfast and a regional office at Somme Park in Londonderry. In addition staff are based in offices in each of the sheltered housing schemes throughout Northern Ireland. Clanmil is committed to the delivery of a comprehensive local area service provision that allows easy access to services and staff by tenants. Housing Officers have a schedule of scheme visits. Clanmil recognise the importance of working in partnership with local voluntary statutory and community organisations to help and assist in the delivery of an efficient and effective local area service.

Manage neighbour nuisance and anti-social behaviour

3.14 All neighbour nuisance and ant-social behaviour issues are dealt with in accordance with the terms and conditions of the tenancy agreement. Clanmil has adopted the model policy and procedure documents developed by the Department for Social Development arising out of the Housing (NI) Order 2003. Information will be gathered by the investigating officer and any action which is deemed necessary and appropriate to the circumstances will be taken.

In order to ensure consistency for all social housing tenants and in accordance with legislation introduced under the Housing (NI) Order 2003 the Department of Social Development issued a model document on policy and procedure to all Housing Associations for dealing with Nuisance and Anti Social Behaviour in order to comply with the legislation. This policy is defined in the legislation.

Rent collection

3.15 Rent collection includes:

- Rent
- Rates
- Service charge
- Support charge
- Recoverable charges
- Heating charges

Methods of collection includes: direct debit, housing benefit payment direct, payment cards, standing order, on-line, direct payments by other agencies or cash payments.

Advice and Information on methods of rent payment and prevention is provided together with information and the consequences of non-payment and recovery action. This information is provided and available to all tenants in the following ways:

- pre-tenancy induction – *Getting to Know You* events
- signing up for the Tenancy Agreement
- a 6 weekly phone call from staff
- home visits
- office visits
- arrears letters
- tenant meetings/surgeries

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- tenants handbook
 - tenancy agreement
 - tenants newsletter The Clanmil Chronicle
 - newsletters and other tenant information leaflets
 - on the website
 - in annual rent increase letters
 - tenants with arrears are encouraged to seek independent advice from a solicitor, the CAB or Independent Advice Centre

Housing staff encourage the uptake of benefits by providing advice information and assistance directly to tenants as and when required and in a format that is easily understood. Support and assistance is provided in completing applications for Housing Benefit. In sheltered housing specialist agencies providing advice on benefits are invited to hold a tenants meeting to increase benefit take up among older people.

Tenants are encouraged to seek advice when in arrears. Staff provide contact information on local independent advice centres including the Citizens Advice Bureau.

Tenant participation

- 3.16 Clanmil Housing Association is committed to tenant involvement in the operation of its business. The association provides tenants with the opportunity to help shape and influence housing services and their delivery.

This is set out in Clanmil Tenant Participation Strategy and is reflected in tenant participation on the Association's Board of Management and committee structure within the organisation.

Tenant participation is facilitated in the following ways:

Individual tenant communication; Tenant Associations/house committees at scheme level; tenant Annual General Meetings, focus groups, Participation in best value reviews, maintenance surgeries, tenants newsletter, the Tenant Forum.

To encourage greater tenant participation Clanmil Housing Association offers a flexible approach to facilitate tenant involvement including: travel costs, childcare facilities or assistance towards childcare costs, convenient times for meetings

at venues and locations that are easily accessible and conform to any Disability Discrimination Act requirements.

Funding is available from the Association in the form of a start up grant to assist in establishing a tenants association and advice on a template for a Constitution for the groups.

Tenancy management

3.17 Clanmil Housing Association is committed to providing an excellent tenancy management service to all our tenants. We recognise the importance of working in partnership with other voluntary, statutory and community organisations to help and assist in the delivery of an efficient and effective tenancy management service. This service is delivered in a number of ways through or by:

- Local scheme and office based staff
- Home visits
- Regular Scheme visits
- Local surgeries
- Office visits
- Focus group meetings
- Written correspondence
- Browse-a-loud
- E-mail
- Web site

In the performance and delivery of a comprehensive tenancy and estate management service to all our tenants Clanmil operates from a number of key locations to provide easy access to services and staff listed below:

Head Office

Northern Whig House

Waring Street

Belfast

BT1 2DX

Telephone No: 028 9087 6000

Fax No: 028 9087 6001

Email: housing@clanmil.org.uk

Website: www.clanmil.org

North West Regional Office

40 Somme Park

Altnagelvin

Londonderry

BT47 2NE

Telephone No: 028 7134 2573

Email: housing@clanmil.org.uk

Website: www.clanmil.org

Application forms for general housing may be obtained from any Clanmil office or on line at www.clanmil.org. Forms may also be obtained from any housing association in Northern Ireland and the Northern Ireland Housing Executive and may be downloaded from their website: www.nihe.gov.uk.

Void Management

- 3.18 Clanmil Housing Association has a voids strategy that is activated if a property becomes difficult to let or becomes long term void as defined under the Housing Selection Scheme as 4 weeks. This strategy is adopted and focuses solely on the property attributes.

The strategy includes the following measures:

- Advertisement and marketing
- Open weeks
- Remodelling of accommodation including change of use
- Redecoration if necessary
- Signage
- Information on the website
- Implementation of support services for particular client groups
- Upgrading the heating systems from economy seven to gas/oil

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 Housing Management policy:

- a) Pre-consultation research commissioned by NIFHA and undertaken by IMS Consultants during February – April 2007
- b) The Association's internal management information on the profile of tenants and service users
- c) 2001 Northern Ireland Census Data
- d) Office for National Statistics
- e) Northern Ireland Research and Statistics Agency data
- f) NICORE – statistics of all lettings made by the Association
- g) Housing Waiting list data
- h) Data from NIFHA's Annual Benchmarking exercise with other associations.
- h) Qualitative Feedback from housing management staff
- i) Clanmil Housing Association's Tenant Satisfaction Surveys
- j) Complaints register
- k) Responses received in relation to Associations original Equality Scheme Consultation
- l) Equality Commission Codes of Practice
- m) Mystery Shopping arranged by Northern Ireland Tenant Action Project.

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

IMS Pre-consultation Survey

4.3 A Report from IMS Consultants, prepared for NIFHA, providing consultation feedback on equality impact of housing management and maintenance policies dated May 2007 highlighted various issues that may affect various groups within Section 75. The issues raised in relation to the respective S75 groups are detailed below.

Age

The main issues affecting the elderly are:

- Barriers to consultation and involvement – travel, caring responsibilities, disabilities affecting communication
- Community safety
- Delays in Occupational Therapy assessments for aids and adaptations.

Reported issues affecting young people included:

- Stereotyping of children and young people in relation to definitions of anti-social behaviour
- Lack of understanding of their needs and rights
- Lack of provision of play areas
- The need for greater levels of support to enable young people to sustain their tenancies

Dependents

The following are the main issues affecting people with dependents:

- Allocations policies – This is outside the scope of the Year 2 EQIAs
- Lack of understanding of needs of carers
- Lack of understanding of the rights of children

Disability

The main issues affecting disabled people in relation to housing management and maintenance are:

- Safety – harassment, prejudice, social concerns
- Lack of understanding of needs
- Access to information
- Understanding of rights and responsibilities
- Understanding of enforcement processes
- Access time – carers
- Tenant Participation barriers

Gender

The following issues were identified:

- Safety – These concerns related to sex offenders and allocations, which are outside the scope of Year 2 EQIA's. Some comments relate to domestic violence and older women
- Barriers to involvement – childcare costs

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- Understanding of rights and responsibilities – separated, young women
 - Communications

Marital Status

The main issues reported were:

- Community safety, particularly in relation to young, single mothers
- Allocation of sex offenders – This is outside the scope of the Year 2 EQIA's.

Race

The main issues affecting people from ethnic minority backgrounds in relation to housing management and maintenance policies are:

- Community Safety – harassment, prejudice (generally)
- Lack of understanding of needs
- Access to information
- Understanding of rights and responsibilities
- Understanding of enforcement processes
- Tenant Participation barriers

Religious Belief / Political Opinion

The main issues are:

- House prices
- Housing need – Catholic areas
- Mixed housing

These issues are outside the scope of the Year 2 EQIAs, and in some cases the control of the associations e.g. Housing need is assessed by the NI Housing Executive.

Sexual Orientation

The main issues affecting gay, lesbian, bi-sexual and transsexuals in relation to housing management and maintenance policies are:

- Prejudice and fear of harassment or intimidation – this was general concern and not specifically related to the service provision
- Stereotyping – lack of understanding of needs

Profile of Service Users

4.4 Total housing stock as at 31 March 2007

	Units	% of housing stock
Housing with Care (frail elderly)	41	2%
Supported	70	4%
Sheltered	950	56
General Needs	544	32%
Category One Elderly	92	5%
Resident staff accommodation	10	1%
Total units	1708	100%

4.5 The principal sources of equality information about tenants are tenant surveys and NICORE lettings statistics.

4.6 Details below cover the new lettings from 2006 -2007 and have been taken from the NICORE report. We are currently upgrading our IT systems to enable us to provide accurate age profile reports for all tenants.

4.7 Total lettings for the period April 2006 – April 2007 : 281

Age

Age 16- 24	46 = 16%
Age 25 – 44	67 = 24%
Age 45 – 59	36 = 13%
Age 60 Plus	132= 47%

The Association does not provide a secure tenancy to anyone under the age of 16 years due to the restrictions of the statutory Housing Selection Scheme. The Association does not normally allocate a tenancy to persons under the age of 18 years unless a guarantor is provided.

4.8 The Association's tenant base in relation to other Section 75 Categories are as follows:

Marital Status

Married	25	= 9%
Unmarried	122	= 43%
Divorced	34	= 12%
Widowed	67	= 24%
Separated	33	= 12%

Disability

Yes	84 = 30%
No	197 = 70%

Dependants

Care of a child	94 = 33.4%
Care of a disable person	15 = 5.3%
Care of an Elderly person	4 = 1.2%
No dependant	168 = 60.1%

Gender

Male	102 = 36.3%
Female	179 = 63.7%

Ethnic group

White	277 = 98.5%
Irish Traveller	2 = 0.7%
Mixed	1 = 0.4%
Black Caribbean	1 = 0.4%

Religious Belief

Protestant	125 = 44.5%
Catholic	139 = 49.5%
Mixed	3 = 1.1%
None	8 = 2.8%
Other	5 = 1.9%

- 4.9 At present, Clanmil does not collect data on political opinion or sexual orientation. The 2004 Northern Ireland Life and Times Survey indicates that 1% 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.
- 4.10 According to the 2004 Northern Ireland Life and Times Survey 39% considered themselves to be unionist, 23% stated that they were nationalists whilst 37% stated that they were neither.

Complaints

- 4.11 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, during the last year the Association has received 34 complaints about its Housing Management service but none that would indicate an adverse impact arising from this policy.

Tenant Satisfaction Surveys

- 4.12 The Association's Tenant Satisfaction Surveys invite tenants to state if they are satisfied with the Association's standard of service. Out of those surveyed the majority of tenants stated that the Association's service is excellent or good.

Inspection/ Satisfaction Reports

- 4.13 The Department for Social Development's Draft Inspection Report dated June 2007 "considered that the Association's Corporate Management and Property Management and Estate maintenance to be "good". The Report also considered that "there is a strong ethos in the Association for implementing improvement. This was evident by the many ongoing projects to effect improvement which are in place and the degree of engagement with tenants and tenant representatives to improve services available to their tenants."

Ombudsman Report

- 4.14 There have been no complaints raised where Clanmil was found to be at fault by the Ombudsman in relation to the Housing Management practices of the association.

Internal Audit

- 4.15 An Internal Audit Report dated May 2005 reviewing compliance of internal controls on Lettings and Voids found that internal controls are being operated continuously and effectively.
- 4.16 An Internal Audit report dated December 2006 testing the compliance of Rent Setting, Collection and Arrears found that there were no recommendations still outstanding from the previous review. The compliance testing indicated that the internal controls are being operated continuously and effectively and provides assurance that there is effective control subject to the recommendations contained in the report being implemented.

5. ASSESSMENT OF IMPACT

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- 5.1 This section outlines our assessment of the impact of the Association's Housing Management 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 Housing Management policy.
- 5.3 Many of the issues raised during the IMS Pre-consultation survey highlighted issues of Access & Communications in relation to services rather than specifically to Housing Management. 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 that are outside the scope of this particular EQIA or even the remit of the individual association e.g. healthcare or community safety, house prices. Where relevant associations will raise these matters with the appropriate authority. In addition, NIFHA and/or association representatives participate in a wide range of inter-agency groups aimed at addressing issues such as community safety, housing of sex offenders or the provision of care and support.
- 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 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 Housing Management policies:

- The continued implementation and monitoring the impact of mitigating measures introduced following the Access and Communications EQIA Co-ordination Group
- Action findings of internal/ external audits that are relevant to Housing Management
- Development of website
- Ongoing training and awareness for staff and the Board of Management on equality, diversity and social inclusion.
- Local tenants meetings and maintenance surgeries taking into account the lifestyle of tenants and using venues and times that best suit the needs of the tenants.
- New tenancy sign-ups providing Getting to Know You events for tenants in new developments to encourage strong community links and tenant involvement.
- Adjustments to services – promote the availability of home visits and arrange tenant meetings at times and in venues and locations that would encourage greater participation
- Further promotion of after hours services
- The provision of a more holistic housing management service through the development of links with local groups
- Promoting tenant involvement including encouraging participation in the Tenant Forum, tenants associations and house committees
- Working with the NIFHA to promote the awareness of the Housing Association movement as a major provider of social housing in Northern Ireland
- To promote the work of Clanmil Housing Association within local communities
- To work in partnership with other Housing Associations to arrange cultural awareness days/activities; invite representatives from groups to attend meeting in a joint approach to raise the profile of Housing Associations and to increase awareness of different groups and the range of their needs
- Flexibility in the level of support provided at sign-up i.e. dependent on the needs of the tenant(s)
- Using Getting to Know You sessions at tenancy commencement administration to improve tenants' understanding of their rights and responsibilities

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- Calling all new tenants within the first 6 weeks of their tenancy to address any concerns that they may have
 - Maintain and where possible improve upon working arrangements with community groups as conduits for information and meaningful participation between the Association, tenants and the wider community
 - Promote and support activities that encourage greater understanding, tolerance and respect for Section 75 groups

7. CONSULTATION

- 7.1 Clanmil has endeavoured to give careful consideration to the measures that might be taken to make the Housing Management 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 will ensure that it consults effectively with those groups directly affected by its Housing Management policy, and their representatives.
- 7.3 Staff will be available to discuss these proposals in person, by telephone, or by e-mail, as requested. Meetings may also be arranged to discuss the way forward and the Equality Impacts of this document, if required.
- 7.4 The period of consultation will end on 2 November 2007.
- 7.5 Comments in relation to this report should be submitted in writing to:

**Colette Moore
Clanmil Housing Association
Northern Whig House
3 Waring Street
Belfast
BT1 2DX**

**Tel No: (028) 9087 6000
Fax No: (028) 9087 6001
E-Mail: housing@clanmil.org.uk**

- 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 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.