



**Clanmil Housing Association**

**CARE AND SUPPORT**

**Equality Impact Assessment**

**Consultation Document**

**May 2008**

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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 Care and Support policy is:

To deliver to people with care and/or support needs appropriate services which maximise their quality of life, 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 Care and Support policies
- 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

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## 2. INTRODUCTION

### Statutory Equality Duties

2.1 Section 75 of the Northern Ireland Act requires Clannmil 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 Colette Moore using the contact details given on page 2.

2.4 Following this screening process and the associated consultation, the Association developed a 5 Year Equality Impact Assessment programme. The Care and Support policies were scheduled for assessment in year three of this programme.

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

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

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

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

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

## **2.8 About Clanmil Housing Association**

2.9 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 and housing with care.

2.10 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."

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2.11 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.

2.12 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.

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### 3. THE POLICY

#### Description of Policy

The Care and Support policies describe the Care and Support service the Association provides to its tenants and the wider community.

#### Policy Aim

3.1 The aim of the Care and Support policies is:

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

The scope of the Care and Support activities covered in the policy include:

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

\*Please see below for details of the types of people who may be entitled to the Supporting People Grant.

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

Underpinning objectives include:



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A key objective of housing association support services is to make a positive difference by addressing adverse impact.

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

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

## **Scope of Review**

3.2 The main stakeholders in relation to the policy include anyone seeking or receiving the Association's Care and Support service or any other stakeholder of the Association. This can be any of the following:

### External

- Access NI (ANI)
- Applicants for support services listed at 3.1 above
- Current service users
- Department of Employment and Learning (DEL)
- Department for Social Development (DSD)
- Elected representatives
- General public
- Health and Social Care Trusts
- Inspection and assessment bodies
- Northern Ireland Housing Executive (NIHE)
- Northern Ireland Social Care Council (NISCC)
- Other Housing Associations
- Other statutory agencies
- Partners or providers of Housing Support Services
- Past service users
- Recognised service user groups/organisations
- Relatives and carers
- Representatives of the local community
- S75 representative groups
- Suppliers

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### Internal

- Board members
- Management
- Staff

### Department for Social Development

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

### Inspection and Assessment bodies

There are also other bodies that can look at aspects of the Association's Care and Support service:

- The Regulation and Quality Improvement Authority (RQIA)
- The NIHE's Supporting People Team
- Environmental Health Departments
- ISO 9001:2000
- Centre for Sheltered Housing Studies

### Ombudsman

Anyone dissatisfied with the way in which the Association carries out its Care and Support 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 Care and Support policies.

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 Care and Support may be considered during all equality impact assessments. Whilst considered

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to be important by the Association, the following areas do not come under the scope of this equality impact assessment:

- **Access & Communications generally** - The Year 1 EQIA on this policy dealt with overall issues relating to accessing the Association's services (including care and support) and communicating with the organisation. Please note criteria for accessing these services are based on need and set by the Supporting People Commissioners not the associations
- **Complaints about Care and Support** – This was covered by the Year 1 EQIA on Complaints
- **Care and Support services which are totally provided by a Joint Management Partner** – This is when the Association provides the building but another organisation provides the support service.
- **Maintenance in a Care and Support setting** – This was covered by a Year 2 EQIA
- **Setting support and other charges** - This will be covered in a separate EQIA

3.4 Care and Support 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 Care and Support service provision:

- Health & Personal Social Services (NI) Order 1972
- Enduring Powers of Attorney (NI) Order 1987
- Sexual Offences (NI) Order 1978
- The Fire Regulations and the Fire Precautions Order 1984
- The Housing Benefit (General) (Amendment No.2) Regulations (NI) 1987
- Social Security Claims and Payments Regulations (NI) 1987
- The Food Safety (NI) Order 1991
- Health & Safety at Work Regulations (NI) 1992
- Registered Homes (NI) Order 1992
- Disability Discrimination Act 1995
- Mental Health Order 1996
- Prescription Only Medicines (Human Use) Order 1997
- Data Protection Act 1998
- Section 75 of the Northern Ireland Act 1998

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- Fire Precautions (Workplace) Regulations (NI) 2001
  - Misuse of Drugs Regulations 2001
  - Sex Offenders Act 2001
  - Housing Support Services (NI) Order 2002
  - Health & Personal Social Services (Quality, Improvement and Regulation) (NI) Order 2003 and associated regulations
  - Protection of Children and Vulnerable Adults (NI) Order 2003
  - Health & Safety Control of Substances Hazardous to Health Regulations (NI) 2003 (COSHH)
  - The Children's (NI) Order 2003
  - Residential Care Homes Regulations (NI) Order 2005
  - DSD Regulatory Framework (2006)
  - Food Hygiene Regulations 2006
  - The Health & Safety at Work & Fire Precautions (Workplace) (Amendment Regulations (NI) 2003
  - The Smoking NI Order 2006
  - Domiciliary Care Regulations (NI) 2007
  - Safeguarding Vulnerable Groups (NI) Order 2007

This list is not exhaustive.

- 3.6 In addition to Care and Support 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 are Care and Support policies in place, as part of our commitment to delivering an excellent customer service the Equality Impact Assessment presented an opportunity to improve the existing policies.
  - (b) The Association believes that access to services, including Care and Support, is of high importance to S75 groups.
  - (c) Clanmil Housing Association also believes that its Care and Support policies 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.

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- (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 Care and Support policies have been defined by the Association's Board and/or management team. It is implemented by relevant staff throughout the Association.

The Association also works to the following standards:

The Quality Assessment Framework which is a self assessment document used to check the quality of service funded under Supporting People. This inspection process is used by the NIHE to ensure compliance with the standards set for providers of support services. The NIHE's Supporting People team usually follow up with a verification visit.

The Centre for Sheltered Housing Studies Code of Practice is a quality accreditation for sheltered housing providers. Clanmil first acquired the Code in 2003 and we were successfully reaccredited in 2005. The current accreditation is due to expire in December 2008 and we have commenced work on the revised Code. The Code is an indication of a high standard of service provided in sheltered housing. Secondly, our main funder of sheltered housing services is Supporting People (SP) and SP has now accepted the standards of the Code as they cross map with the standards required by the Quality Assessment Framework of Supporting people.

The Regulation Quality and Improvement Authority has the power to set standards for service provision and inspect Domiciliary Care, Registered Homes, unregistered Day Care facilities and family centres as well as the Social and Clinical Governance arrangements of these services. The Department of Health, Social Services and Public Safety have developed minimum standards for a range of regulated services including Nursing Homes. The RQIA will look for evidence that the standards are being met through: discussions with residents, staff, managers and others; observation of activities in the home and inspection of written policies, procedures and records.

The Northern Ireland Social Care Council monitor, inspect and register the health and social care sector against set employer and staff standards. It is an independent public body, established to increase

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public protection by improving and regulating standards of training and practice for social care workers.

All services provided to vulnerable adults require preventative checks through Access NI to ensure staff are cleared to work in the Health and Social Care sector.

3.9 Care and Support policies documents are developed in compliance with legal requirements and agreed by the Senior Management Team.

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.

### 3.11 Housing Support

Housing Support is designed to help people live independently. It is usually provided to those living in particular types of accommodation, such as sheltered housing schemes for older people or supported housing schemes for people with support needs including dementia. A Housing Support Worker will assist those living in these types of schemes to remain independent. Housing Support services are not time limited, they are available for as long as the person needs them. Housing support covers a range of activities including some or all of the following:

- giving general counselling
- providing advice and support
- making daily calls
- maintaining safety of equipment,
- maintaining the security of dwellings
- offering help with benefits
- arranging activities with tenants
- life skills training such as budgeting, shopping, cooking

### 3.12 Residential Housing with Care

Residential Housing with Care offers similar types of care to those listed above but it is usually more intensive. The schemes are registered with RQIA and subject to RQIA inspection. The schemes are

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funded through Healthcare Trusts and referrals are usually made by Social Services. Clanmil residential homes provide person-centred care and support to individuals based on agreed care and support plans to include the following:

- Administration of medication
- Infection control
- Mental health
- Mobility
- Nutritional needs
- Personal hygiene
- Physical health
- Promotion of continence
- Access to community
- Cultural and spiritual needs
- Finance
- Repairs and Security
- Activities of daily living

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## **4. CONSIDERATION OF AVAILABLE DATA AND RESEARCH**

### **Sources of information**

4.1 The following were used in considering available data relevant to the impact of the Care and Support policies:

- a) Pre-consultation research commissioned by NIFHA and undertaken by IMS Consultants during March 2008
- b) Internal events to assess the impact of Care and Support policies held during November 2007
- c) The Association's internal management information on the profile of tenants and service users
- d) 2001 Northern Ireland Census Data
- e) Office for National Statistics
- f) Northern Ireland Research and Statistics Agency data
- g) NICORE reports – statistics of all lettings made by the Association
- h) Housing Waiting List data
- i) Annual Regulatory Returns
- j) Data from NIFHA's Annual Benchmarking exercise
- k) Qualitative Feedback from Care and Support staff
- l) Clanmil Housing Association's Tenant Satisfaction Surveys
- m) Supporting People Scheme reviews
- n) RQIA Inspection reports
- o) Complaints and compliments relating to Care and Support
- p) Equality Commission Codes of Practice
- q) Equality in Northern Ireland: the rhetoric and the reality (Sept 2006) – CAJ
- r) CSHS

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

### **IMS Pre-consultation Survey**

4.2 A Report from IMS Consultants, prepared for NIFHA's EQIA Co-ordination Group (ECG), providing consultation feedback on the impact of Care and Support and Human Resource policies dated April 2008 highlighted various issues that may affect the groups within the Section 75 categories. The full report, which includes responses from the ECG, is available at Appendix A. The issues raised in relation to the respective S75 groups are detailed below.



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## **Internal Data collection events**

- 4.3 Housing associations held two meetings during November 2007 where a range of staff undertook an assessment of the impact of both the Care and Support and the Human Resources – Recruitment and Selection policies.

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

The table shown below summarises the outcomes of the work detailed at 4.2 and 4.3.

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Key issues highlighted for each of the nine Section 75 categories

S75 Category	Source of data	Issues highlighted
Age	IMS pre-consultation survey	Lack of care at home (generally) Mobility and access Living in run-down accommodation due to financial pressures Need to work with housing associations that cater for elderly Chinese community Consultees cited access to services (in general) as a issue affecting young
	Housing association meetings in Nov 2007	Sheltered accommodation is available to people above a certain age Housing associations are not allowed to provide care or support services to those under 16
Dependents	IMS pre-consultation survey	Consultees cited no issues that affected people with dependents however the difficulty of getting a new home suitable for a divorced person with children was mentioned in relation to marital status
	Housing association meetings in Nov 2007	Identified potential for adverse impact if carers could not be accommodated due to the limitations of the building or the tenancy
Disability	IMS pre-consultation survey	Mobility and access Whether personal care is available Whether policies accommodate mental health issues
	Housing association meetings in Nov 2007	Some care services will cause adverse impact because that is the aim of the service – for example meeting a particular health need such as helping those with mental health difficulties
Gender	IMS pre-consultation survey	Consultees suggested there is a need to keep separate policies for men and women Homophobic attacks on homes
	Housing association meetings in Nov 2007	Some service users may have issues about personal care due to the fact that most staff in care situations tend to be female

S75 Category	Source of data	Issues highlighted
Marital status	IMS pre-consultation survey	Availability of housing and support for single people The difficulty of getting a new home suitable for a divorced person with children
	Housing association meetings in Nov 2007	There is potential for adverse impact for a married couple who want to share a room in a care home as most facilities are not set up to meet this need
Political opinion	IMS pre-consultation survey	Consultees cited no issues
	Housing association meetings in Nov 2007	No issues were identified
Racial Group	IMS pre-consultation survey	Lack of awareness of what sort of care and support is available to those who have been victims of racism or hate crimes Language barriers in terms of understanding how to access information and also in relation to the quality of information available Specific consideration should be given to ethnic groups with other problems Migrant workers should have access to training and employment support (N.B. this appeared to be a general comment) Majority of information provided is not available in Chinese
	Housing association meetings in Nov 2007	Staff recognised there could be access issues but felt these had been addressed in the Year 1 EQIA on this topic The level of English required for the post could have adverse impact for some people Staff identified potential for adverse impact for migrant workers Staff also recognised that problems may arise as a result of service users not wanting staff from a different background

S75 Category	Source of data	Issues highlighted
Religious belief	IMS pre-consultation survey	Consultees cited no issues in this area
	Housing association meetings in Nov 2007	<p>Association staff felt there was potential for adverse impact in relation to:</p> <ul style="list-style-type: none"> <li>• Dietary requirements</li> <li>• Prayer rooms</li> <li>• Managing death</li> <li>• Gender issues</li> <li>• Storage of food</li> </ul> <p>The relevance of these points would depend on the type of scheme and the religion of the individual</p> <p>Transporting service users to religious venues may cause difficulty for care staff whose beliefs differ from that of the client</p>
Sexual orientation	IMS pre-consultation survey	<p>Lack of housing / care support for younger people who have been put out of their home because of their sexual orientation</p> <p>Higher consideration needs to be given to those who are the victims of hate crimes or homophobic attacks on their home</p> <p>Older people used to a society that is not accepting of same sex relationships may feel they have to hide their true identity if they have to move to a residential home</p>
	Housing association meetings in Nov 2007	No issues were identified

## Profile of Service Users

- 4.4 The Association currently has 1977 units of accommodation, which includes: 954 Sheltered Housing, 42 Housing with Care and 73 Supported Housing.
- 4.5 The principal sources of equality information about tenants are tenant surveys and NICORE lettings statistics. Clanmil also records tenant's details on their Care and Support Plans.
- 4.6 The age breakdown of the Association's tenants in receipt of Care and Support services is as follows:
- Age 100+ = 3  
90+ = 67  
80+ = 360  
70+ = 320

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- 60+ = 214
  - >60 = 104
  - Dependents = 0
  - Disability = 173
  - Gender = 720 Female, 309 Male
  - Martial Status= N/K
  - Racial Group = majority are British/European
  - Religious Belief = N/K

The Association does not provide a secure tenancy to anyone under the age of 16 years due to the criteria of the Housing Selection Scheme as managed by the Northern Ireland Housing Executive.

- 4.7 At present, Clanmil does not collect data on political opinion or sexual orientation. It is Clanmil Housing Association's intention to add these categories to the monitoring form to begin to gather this information as from January 2009.
- 4.8 Statistics from the 2006 Northern Ireland Life and Times Survey in relation to the S75 categories are shown at Appendix B
- 4.9 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 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

- 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 three complaints about its Care and Support service but none indicated adverse impact resulting from these policies.

All tenants are able to make compliments on-site which we record and circulate. These include *"many thanks for the respite care you provided for my mum"*; *"everyone is delighted with the newly painted scheme"* and *"...praises the workmanship of JMC in relation to the installation of a shower in her flat"*.

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## 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 during April 2008 51% of tenants stated that the Association's service is 'excellent' or 'good.'

## Inspection/ Satisfaction Reports

- 4.13 The Department for Social Development's Inspection Report dated January 2008 concluded that Clanmil Housing Association has established a fairly sound internal control environment within the area of Care and Support. A greater proportion of the Association's stock is sheltered housing. The Association has made great strides in promoting active Co-ordinators who encourage and work with tenants to motivate and create creativity among its tenants. Some tenants have completed the "Silver Surfers" event. The Association also has Housing Support Officers who have forged stronger working relationships with the local Trust.

A NIHE Supporting People Service Review was carried out in June 2007. Supporting People decided to passport Clanmil as it has achieved the Code of Practice, CSHS. Compliance with the COP (May 2003 version) can passport service providers through 100% of the Quality Assessment Framework (QAF – 6 core objectives) at Level C. Clanmil therefore has been graded overall at Level C.

Several recent RQIA reports stated that Clanmil Housing Association provided *"clean, light and inviting"* premises; *"staff presented as friendly, knowledgeable and caring"*; *"the home was warm, clean and comfortable."*

## 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 Care and Support practices of this Association.

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## **5. ASSESSMENT OF IMPACT**

- 5.1 This section outlines our assessment of the impact of the Association's Care and Support policies on the nine 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 Care and Support policies.
- 5.3 Many of the issues raised during the IMS Pre-consultation survey highlighted concerns around Access & Communications in relation to services rather than specifically to Care and Support. 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. lack of healthcare identification of housing/support needs or even training requirements. 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 We also feel it is important to state that the very nature of some care or support services will bring a certain amount of adverse impact as they were set up to address the needs of a particular group. For example sheltered housing is intended to be for older or disabled people therefore it would not be suitable for other groups. Similarly schemes to assist individuals with learning disabilities would not be appropriate for those who do not have that need.
- 5.6 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.
- 5.7 The issues that we have identified as having the potential to cause adverse impact are:

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- Age restrictions generally
  - The age at which people can access sheltered housing
  - Provision of personal care by staff of a different gender to the recipient
  - Married couples who wish to share accommodation in a residential or nursing setting
  - Balancing our commitment to equality of opportunity for potential employees whose ability to communicate in English is very limited against the needs of service users and legal obligations under Health and Safety
  - Managing situations where service users attitudes may cause adverse impact for staff providing care
  - Accommodating the religious needs of an increasingly diverse community



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

The following are options that could potentially mitigate adverse impact arising from the Care and Support policies:

- Provision of information in alternative formats where appropriate (usually care and support plans will have identified what is required by the individual user).
- Offer flexibility in the level of support provided i.e. dependent on the needs of the tenants. Where possible, and whilst operating within available resources, adapt the service to suit the specific needs of the tenant.
- Conduct ongoing training programmes to ensure awareness of diversity and cultural issues – these should include services to tenants as well as staff.
- 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.
- Promote the work of Clanmil within the local communities to ensure that potential service users from all S75 categories are aware of the care and support that is available.
- Work with the local community to promote social inclusion and good relations.
- Promote and support activities that encourage greater understanding, tolerance and respect for Section 75 groups.

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## 7. CONSULTATION

- 7.1 Clanmil has endeavoured to give careful consideration to the measures that might be taken to make the Care and Support policies most efficient, effective and equitable. The measures outlined in section 6 are not intended to be definitive or exhaustive. The Association is planning to formally consult on its findings over a 12 week period and would welcome feedback on these proposals and any other comments that would assist us to improve the policy.
- 7.2 Clanmil will ensure that it consults effectively with those groups directly affected by its Care and Support policies 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 29 August 2008.
- 7.5 Comments in relation to this report should be submitted in writing to:

Colette Moore, Director of Housing  
Clanmil Housing Association  
3 Waring Street  
Belfast  
BT1 2DX

- 7.6 Comments in any other format will also be accepted.
- 7.7 If you require any further information, you may contact the Association using the contact details given in 7.5.
- 7.8 If you require information about housing associations generally or about the Joint Equality Exercise co-ordinated by NIFHA please contact:

**The Northern Ireland Federation of Housing Associations**  
**38 Hill Street**  
**Belfast**  
**BT1 2LB**  
**028 9023 0446**  
**[www.nifha.org](http://www.nifha.org)**

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## **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.

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## Appendix B

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

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

### AGE

Age of respondent (in age categories)

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

### DEPENDENTS

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

	%
<b>Yes</b>	11
<b>No</b>	89

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

	%
<b>Yes</b>	14
<b>No</b>	86

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## DISABILITY

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

	%
<b>Yes</b>	32
<b>No</b>	68

## GENDER

Sex of respondent

	%
<b>Male</b>	43
<b>Female</b>	57

## MARITAL STATUS

Marital status of respondent

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

## POLITICAL OPINION

Generally speaking, do you think of yourself as a Unionist, a Nationalist or neither?

	%
<b>Unionist</b>	36
<b>Nationalist</b>	23
<b>Neither</b>	40
<b>Don't know</b>	1

## RACIAL GROUP

To which of these groups do you consider you belong?

	Number of respondents*
<b>White</b>	1206
<b>Black</b>	2
<b>Asian</b>	5
<b>Chinese</b>	2
<b>Irish Traveller</b>	2

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<b>Other (please specify)</b>	8
<b>None of these</b>	4
<b>Don't know</b>	1

## RELIGIOUS BELIEF

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

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

## SEXUAL ORIENTATION

Can you tell me which of these best describes you?

	%
<b>I am 'gay' or 'lesbian' (homosexual)</b>	0
<b>I am heterosexual or 'straight'</b>	98
<b>I am bi-sexual</b>	0

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<b>I do not wish to answer this question</b>
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