



Clanmil Housing Association

CHARGING POLICIES

FINAL

Equality Impact Assessment

FINAL Document

February 2010

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If you would like an alternative format, please contact:

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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 Charging policies is:

To operate a schedule of charges for provision of services so as to cover the operating costs for the Association while acting in a fair and equitable manner to the service users.

This report provides the following information:

- Background information on the equality duties and Clanmil Housing Association
- A description of the Association's current Charging 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.

2. INTRODUCTION

Statutory Equality Duties

2.1 Section 75 of the Northern Ireland Act requires Clanmil Housing Association, in carrying out its functions, to have due regard to the need to promote equality of opportunity between:

- Persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Men and women generally;
- Persons with a disability and persons without;
- Persons with dependants and persons without.

2.2 The Association must also, in carrying out its functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

2.3 In line with its equality scheme obligations, the Association screened all of its existing policies to assess whether they impacted on the promotion of equality of opportunity or the duty to promote good relations. The following questions were asked during the screening exercise:

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issue?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant groups.

A report describing the results of the screening process is available from Karen Gilmore (see contact details on page 2).

2.4 Following this screening process and the associated consultation, the Association developed a 5 Year Equality Impact Assessment programme.

Charging 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 **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 in Northern 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 2,200 units throughout Northern Ireland and over 170 staff.

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

3. THE POLICY

Description of Policy

Charging policies describe the policies the Association uses to determine charges for services it provides to its service users.

Policy Aim

3.1 The aim of the Charging policies is:

To operate a schedule of charges for provision of services so as to cover the operating costs for the Association while acting in a fair and equitable manner to the service users.

The scope of the charging activities covered in these policies include:

- **Rent Setting** – This is the process Associations use to set the rent for their properties.
- **Service Charges** – This refers to charges levied by the Association to cover expenditure on either communal services which benefit a number of tenants or those which are provided for an individual tenant or property.
- **Support Charges** – These charges relate to the cost of housing support services. They may be paid directly by an individual who is not eligible for supporting people or funded through the 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

**Please see below for details of the types of people who may be entitled to the Supporting People Grant.*
- **Care Fees** – These charges relate to the cost of personal care provided as part of the Association's service. Such charges are normally funded by the Health and Social Care Trusts; the Department of Health and or by the individual themselves. By care support we mean personal care, e.g., help with daily living tasks.
- **Rechargeable Repairs** – This refers to charges that are the responsibility of the tenant or Joint Management Partner. Such charges will be detailed in the Tenants Handbook.

* 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
 - People struggling to meet their tenancy conditions
 - People leaving institutional care

Scope of Review

3.2 The main stakeholders in relation to the Charging policies are likely to be the following:

- Association Board Members and Management
- Department for Social Development (DSD)
- Health and Social Care Trusts
- Joint Management Partners
- Northern Ireland Housing Executive (NIHE)
- Ombudsman*
- Past service users
- Recognised service user groups/organisations
- Relatives and carers
- Staff
- Tenants and residents (or their legal representatives)
- Voluntary and community sector

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

The list shown at 3.2 is not exhaustive. This list is in alphabetical order.

What this EQIA does not cover

3.3 We anticipate that some aspects of Charging policies may be considered during other 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** - The Year 1 EQIA on this policy dealt with overall issues relating to accessing the Association's services (including Charging policies) and communicating with the organisation
- **Complaints about Service Charges** – This was covered by the Year 1 EQIA on Complaints
- **Maintenance in a Charging policy setting** – This was covered by a Year 2 EQIA

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- **Reimbursement Charges** – This is when the Association recovers actual expenditure which it has paid out on behalf of residents or staff, e.g.,
 - the Association has made a purchase on behalf of a number of tenants so they will benefit from economies of scale
 - the associations recoups the cost of the extra BUPA charge to have family members included in the scheme
 - **Rent Setting for Controlled* properties** – This policy belongs to the DSD and cannot be altered by Housing Associations.

3.4 Charging policies which are linked to Care and Support, Housing Management and Maintenance policies and processes.

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 the development of charging for services:

- Health & Personal Social Services (NI) Order 1972
- Enduring Powers of Attorney (NI) Order 1987
- Social Security Claims and Payments Regulations (NI) 1987
- Registered Homes (NI) Order 1992
- Housing Support Services (NI) Order 2002
- Health & Personal Social Services (Quality, Improvement and Regulation) (NI) Order 2003 and associated regulations
- Residential Care Homes Regulations (NI) Order 2005
- Domiciliary Care Regulations (NI) 2007

This list is not exhaustive.

3.6 In addition to charging policies 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 Charging 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.

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- (b) Clanmil Housing Association believes that access to services, in particular those where charges apply, is of high importance to S75 groups.
 - (c) Clanmil Housing Association also believes that its Charging 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.
 - (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 Clanmil Housing Association's charging policies have been defined by the Association's Board and / or management team. They are implemented by relevant staff throughout the Association.
- 3.9 Charging policies are developed in compliance with legal requirements and agreed by Clanmil Housing Association's Board and Senior Management Team.
- 3.10 Clanmil Housing Association is an independent, voluntary organisation which provides accommodation for people with a variety of housing needs and support needs. It is a not-for-profit social economy business so any charges are formulated on the basis of the operating costs for the association.
- 3.11 Rent Setting

Following the Housing Order (NI) 1992, which deregulated rents for new tenancies provided by Housing Associations, there are two different ways of setting rents.

 - (a) Rents for those properties let before 16 September 1992 are based on a points system laid down by the Department for Social Development. (These are known as Controlled rents.) A property is given a number of points depending on its age, type, number and size of rooms and facilities such as heating. Rents are then calculated on a value per point as set by the Department. Rents are reviewed each April.
 - (b) Rents for all properties let after 16 September 1992 are based on a broadly similar points system devised by Clanmil Housing Association based on property attributes as above, and the rents are then calculated on a value per point which is determined by the

Board of the Association. In addition to the above, the Association must consider the need to cover the cost of management and maintenance and the requirement to make provision for future repairs and to ensure loan charges from private sources are paid. The value of the point is reviewed on an annual basis (and increased in April) after considering the total running costs to be recovered together with the other objectives outlined above.

While the value of the point which is determined by the Board remains distinct from that determined by the DSD each Association aims to set economic rents that are within benchmarks / guidance set by the DSD, and:

- are affordable for people on low incomes, or in receipt of welfare benefits,
- provide sufficient income to enable the Association to manage, maintain, repair and improve its properties and to meet its financial commitments to lenders.

The weekly rent payable by each tenant will be the number of points for their dwelling multiplied by the appropriate rent value per point.

Notes:

1. For re-lets in schemes originally let before 16 September 1992, the rents will be determined by using Clanmil Housing Association's property points and value per point rather than the DSD's points system and value.
2. Clanmil Housing Association's rent setting policy is detailed at Appendix 4.

3.12 Service Charges

Clanmil Housing Association applies charges for expenditure on services that benefit a number of tenants, for example, grounds maintenance, maintaining the safety of shared equipment or providing window cleaning for an apartment block. Such charges are apportioned between all tenants who benefit from the service and may vary depending of the type of accommodation. Service charges are generally reviewed each April and approved by the Board of Management. At Clanmil Housing Association the services provided include the following:

- maintenance and servicing of:-
 - boilers
 - CCTV
 - communal heating and lighting systems

-
- door entry systems
 - emergency lighting
 - fire alarms and extinguishers
 - door entry system
 - intruder alarms
 - laundry equipment
 - helpline system
 - provision of:-
 - communal cleaning
 - communal coin operated telephones
 - communal grounds maintenance
 - concierge / security services
 - heating & lighting
 - insurance
 - line rental (lifts / fire alarms / CCTV)
 - payphone / broadband (line rental)
 - white goods (replacement cost of items supplied by Association)
 - window cleaning

Charges may also be applied for maintenance and servicing of other equipment and the recharge of management company costs.

Services charges may be applicable to former tenants who have purchased their property. In such cases (usually apartment blocks) the service charge may include further items such as:

- contribution towards sinking fund
- maintenance of guttering and drainage systems
- redecoration - external and communal areas
- renewal of floor coverings to common areas
- replacement of communal equipment, e.g., lift

3.13 Housing
Support

In Clanmil Housing
Association

part of the total service charge calculation reflects charges for the provision of Housing Support services and relate to a range of activities including the following:

- support staff costs
- agreeing support plans for tenants
- arranging activities for tenants
- giving general counselling
- life skills training such as budgeting, shopping, cooking
- making daily calls
- maintaining safety of equipment
- maintaining the security of dwellings
- offering help with benefits

-
- providing advice and support

3.14 Heating Charges

Clanmi Housing Association charges for the provision of communal heating in designated housing schemes. This charge is based on the costs of fuel and boiler repairs and servicing at these schemes and is generally reviewed twice per annum and approved by the Board of Management.

3.15 Guest Room Charges

Clanmil Housing Association levies a charge per night for use of guestrooms in sheltered schemes by friends and relatives of tenants.

3.16 Residential Care Fees

This charge is applied for registered residential care homes. It is based on the payments provided by the Department for Health for residents who are care managed. In addition to this payment, Clanmil Housing Association charges a top up fee to residents to support the financial viability of the three small residential homes. The level of top fee is approved annually by the Board of Management.

In Clanmil Housing Association we provide personal care and support for residents. The charges applied for care and support services relate to a range of activities including some or all of the following:

- assistance with and provision of meals
- assistance with dressing
- administration of medication
- personal care plans
- personal development
- personal hygiene
- activities

The balance of the residential care fee covers building and equipment maintenance, buildings insurance.

3.17 Rechargeable Repairs

These are costs which are the responsibility of tenants such as replacement of glass in broken windows, repairs to locks or as a result of damage caused by the tenant, their family or visitors. Full details of these obligations are listed in Clanmil Housing Association's Tenant Handbook which is shown at Appendix 5.

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 Charging policy policies:
- a) Targeted pre-consultation meetings with representative bodies held during June – July 2009 as part of the joint exercise co-ordinated by NIFHA
 - b) A general pre-consultation exercise co-ordinated by NIFHA during July 2009
 - c) The Association's internal management information on the profile of tenants and service users
 - d) NIFHA benchmarking
 - e) Annual Regulatory Returns
 - f) Qualitative Feedback from association staff
 - g) Supporting People Scheme reviews
 - h) Complaints and compliments relating to Charging policies

Pre-consultation data collection

- 4.2 Volunteers from NIFHA's Forum groups held targeted preliminary consultation sessions with a number of representative organisations. Participants included Carers NI, Disability Action, Gingerbread, Multi-Cultural Resource Centre. Their comments are listed at Appendix 2.
- 4.3 Invitations were also made to and apologies received from Age Concern / Help the Aged, NIHE, the political spokespersons of the Alliance, Democratic Unionist, Ulster Unionist, Sinn Féin, Social Democratic and Labour Parties.
- 4.4 NIFHA also invited all 142 organisations listed at Appendix 3 to participate in the pre-consultation using the policy documentation provided on www.nifha.org. 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?

Profile of Service Users

4.5 The principal sources of equality information about tenants are tenant surveys and NICORE lettings statistics. Appendix 1 gives a statistical breakdown of housing association tenants based on information in the NICORE database. The Northern Ireland Continuous REcording of new lettings records and analyses the socio-economic characteristics of new housing association tenants in relation to property size and rent level of their new homes.

New tenants are asked to provide information on the composition and socio-economic circumstances of their households whilst the housing associations add data on the property to be rented and the reason for housing the new tenant. As NICORE information is collected on a face-to-face basis it is not appropriate to ask for personal details in relation to all nine Section 75 groups. This information remains totally confidential and is entirely used for research purposes.

NIFHA is responsible for co-ordinating this survey, inputting the data onto a computerised data-base and providing periodic reports to all housing associations. The datasets shown for General Needs, Sheltered and Supported housing cover seven of the S75 categories.

4.6 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.

4.7 The Association's tenant base in relation to Section 75 Categories is as follows:

This is not a complete report for all tenants.

- Age

18-30	266
31-49	486
50-69	470
70-89	713
90+	78

- Dependents

With dependent	28
Without dependent	2037

- Disability

With a disability	450
Without a disability	1133

- Gender

Male	721
Female	1332

- Martial Status

Divorced	51
Married/Civil P'ship	66
Separated	47
Unmarried	98
Widowed	266

- Political Opinion

Nationalist	42
Other	188
Unionist	240

- Racial Group

Other	1
White	528

- Religious Belief

Protestant	567
Catholic	457
No religious belief	318
Other	23

- Sexual Orientation

Bisexual	10
Gay	3
Heterosexual	306

Complaints

4.8 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, during the last 5 years the Association:

- has received one complaint about its Charging policy service but it did not indicate an adverse impact resulting from these policies.

Ombudsman Report

4.9 There have been no complaints where Clanmil Housing Association was found to be at fault by the Ombudsman in relation to the Charging policy practices of this association.

Internal Audit

4.10 The rolling programme of reviews carried out by the Association's Internal Auditors have not highlighted any adverse impact in relation to the charging policies adopted by Clanmil Housing.

General Feedback

Investors in People

4.11 Clanmil Housing Association is accredited with the Investors in People standard.

ISO External Audits

4.12 Certain aspects of the Charging Policies procedures within Clanmil Housing Association are included in the ISO 9000 : 2000 quality accreditation.

4.13 The procedures are all audited once yearly internally and periodically audited by external auditors SGS Yarsley.

4.14 No audits conducted by the external auditors on procedures which would impact on Charging Policies have indicated corrective actions to be carried out.

Other Feedback

-
- 4.15 RQIA inspection reports for the three residential care homes have raised no issues with the Charging Policies of Clanmil Housing Association.
- 4.16 The Northern Ireland Housing Executive Supporting People Reviews carried out in January 2007 and published in August 2007 raised no adverse issues in relation to the Charging Policies of Clanmil Housing. These Reviews, however, did recommend a change in the apportionment of costs re Service Charges for sheltered schemes between costs eligible for Housing Benefit and costs eligible for Supporting People. This recommendation was implemented with effect from April 2008.

5. ASSESSMENT OF IMPACT

- 5.1 This section outlines our assessment of the impact of the Association's Charging policies on the 9 Section 75 groups based on the evidence considered above. It is our preliminary view there are few adverse impacts that are directly related to the Charging policies.
- 5.2 We also feel it is important to state that the very nature of some charging policies will bring a certain amount of adverse (financial) impact as they apply to a certain group of people, for example, those who need support services. However, these charges arise from the service received by the person and in most cases are calculated on the basis of the cost of provision of a service or for maintenance to / services in a property which benefit all tenants.
- 5.3 Many of the Consultee comments received pre-consultation reflected general concerns that are outside of the scope of this particular EQIA, or even the remit of the individual Association, e.g., issues such as access to housing, and consistency across Housing Associations.
- 5.4 Other issues raised as part of the pre-consultation responses highlighted concerns around Access and Communications rather than specifically to Charging Policies. These concerns have been covered by the Mitigating Measures proposed at that time or have been identified for action as part of that process.
- 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. We welcome any information which helps us to identify adverse impacts.

6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following are options that potentially could mitigate adverse impact arising from the Association's Charging policies:

- Provision of information in alternative formats where appropriate so tenants of all abilities and from all backgrounds can understand how charges are calculated.
- Include questions in tenant surveys to enable ongoing identification of the impact of charging policies.
- Lobby through NIFHA for consistency of approach from Health Trusts
- Continue to encourage tenants to apply for benefit - promote uptake of benefits including Housing Benefit (use of Access to Benefits: A2B)
- Continue to facilitate Scheme staff giving information to tenants at sign up of tenancy on benefit options and assistance with applications.
- Consider the impact of Supporting People funding not being means tested, and recognising that older people are often reluctant to take up benefits, to continue to support older people in claiming benefits
- Encourage use of by tenants of Citizens Advice Bureau services **and other agencies** for debt advice and money management.
- Promote energy efficiency measures to tenants to control levels of heating charges
- Continue to provide all new homes to a minimum standard of Level 3 Code for Sustainable homes which should have a positive impact on heating costs
- Continue to consult with the Tenant Forum in relation to the Association's charging policies.

7. CONSULTATION

- 7.1 Clanmil Housing Association has endeavoured to give careful consideration to the measures that might be taken to make the Charging 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 Charging policy 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 Friday 18 December 2009.
- 7.5 Comments in relation to this report should be submitted in writing to:

Karen Gilmore
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Northern Whig House
3 Waring Street
Belfast
BT1 2DX
T: 028 9087 6000
E: housing@clanmil.org.uk
W: www.clanmil.org

- 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

T: 028 9023 0446

E: equality@nifha.org

W: 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 1

NICORE Equality Statistics

NEW LETTINGS – 2008/9, 2007/08, 2006/07

Table 1 – Mainstream

Table 2 – Sheltered

Table 3 – Supported

Table 4 – Mainstream, Sheltered & Supported

Table 1 - Mainstream Schemes

	2008/09 (Prov)	2007/08	2006/07
Age of Head of Household			
16 - 24	28.9%	28.1%	28.9%
25 - 34	27.6%	28.4%	26.0%
35 - 44	19.2%	19.8%	19.4%
45 - 59	15.2%	15.0%	16.1%
60 - 74	7.0%	7.2%	7.2%
75 plus	2.2%	1.5%	2.4%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	43.1%	42.7%	47.3%
A person with a disability	5.1%	6.3%	6.7%
An elderly person	1.1%	1.7%	1.6%
Head of Household with Disability			
Yes	20.4%	24.2%	22.3%
No	79.6%	75.8%	77.7%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	38.5%	39.6%	38.4%
Female	61.5%	60.4%	61.6%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	11.7%	11.6%	11.0%
Unmarried	67.4%	66.1%	64.9%
Separated	11.4%	11.8%	11.4%
Divorced	6.1%	7.0%	8.4%
Widowed	3.3%	3.5%	4.3%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	96.2%	97.1%	98.1%
Irish Traveller	0.7%	0.3%	0.3%
Chinese	0.5%	1.1%	0.5%
Indian	0.3%	0.1%	0.1%
Pakistani	0.0%	0.0%	0.0%
Bangladeshi	0.0%	0.0%	0.0%
Black Carribean	0.2%	0.1%	0.2%
Black African	0.6%	0.3%	0.4%
Black Other	0.2%	0.0%	0.0%
Mixed	0.5%	0.5%	0.2%
Other	0.8%	0.5%	0.2%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	31.9%	34.2%	36.6%
Catholic	57.1%	55.5%	56.0%
Mixed	0.5%	0.5%	0.3%
Hindu	0.0%	0.0%	0.1%
Jewish	0.0%	0.0%	0.0%
Sikh	0.1%	0.0%	0.0%
Islam	0.1%	0.2%	0.2%
Bhuddist	0.0%	0.1%	0.0%
Orthodox	0.0%	0.0%	0.0%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	3.6%	3.1%	1.9%
No religious belief	6.8%	6.4%	4.9%
TOTAL	100.0%	100.0%	100.0%

Table 2 - Sheltered Schemes

	2008/09 (Prov)	2007/08	2006/07
Age of Head of Household			
16 - 24	0.3%	0.3%	1.2%
25 - 34	0.5%	0.5%	0.4%
35 - 44	1.1%	1.1%	1.3%
45 - 59	15.0%	14.0%	13.1%
60 - 74	42.2%	44.3%	40.9%
75 plus	40.9%	39.8%	43.1%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	0.0%	0.0%	0.0%
A person with a disability	1.0%	2.1%	1.9%
An elderly person	0.8%	1.0%	1.2%
Head of Household with Disability			
Yes	32.9%	35.2%	30.8%
No	67.1%	64.8%	69.2%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	45.8%	49.0%	44.7%
Female	54.2%	51.0%	55.3%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	13.4%	15.4%	11.3%
Unmarried	22.5%	22.4%	23.7%
Separated	11.0%	9.9%	8.5%
Divorced	8.3%	8.8%	9.7%
Widowed	44.8%	43.5%	46.9%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	99.6%	99.6%	99.5%
Irish Traveller	0.0%	0.0%	0.0%
Chinese	0.3%	0.4%	0.3%
Indian	0.0%	0.0%	0.1%
Pakistani	0.0%	0.0%	0.0%
Bangladeshi	0.0%	0.0%	0.0%
Black Carribean	0.0%	0.0%	0.0%
Black African	0.0%	0.0%	0.0%
Black Other	0.0%	0.0%	0.0%
Mixed	0.1%	0.0%	0.1%
Other	0.0%	0.0%	0.0%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	60.6%	59.2%	62.7%
Catholic	31.1%	34.0%	31.2%
Mixed	0.1%	0.7%	0.1%
Hindu	0.0%	0.0%	0.1%
Jewish	0.0%	0.0%	0.1%
Sikh	0.0%	0.0%	0.0%
Islam	0.0%	0.0%	0.1%
Bhuddist	0.0%	0.0%	0.0%
Orthodox	0.0%	0.0%	0.1%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	3.3%	3.1%	2.2%
No religious belief	4.9%	3.0%	3.4%
TOTAL	100.0%	100.0%	100.0%

Table 3 - Supported Schemes

	2008/09 (P)	2007/08	2006/07
Age of Head of Household			
16 - 24	32.9%	31.7%	32.3%
25 - 34	20.0%	21.1%	21.3%
35 - 44	18.6%	16.6%	17.6%
45 - 59	16.1%	16.2%	15.7%
60 - 74	3.7%	5.2%	4.6%
75 plus	8.8%	9.1%	8.6%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	15.2%	15.7%	12.6%
A person with a disability	0.8%	0.9%	0.6%
An elderly person	0.2%	0.2%	0.2%
Head of Household with Disability			
Yes	36.8%	45.6%	37.2%
No	63.2%	54.4%	62.8%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	49.5%	44.3%	48.7%
Female	50.5%	55.7%	51.3%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	8.5%	9.3%	8.6%
Unmarried	70.0%	68.4%	70.4%
Separated	9.9%	10.0%	8.3%
Divorced	4.4%	4.2%	7.9%
Widowed	7.1%	8.0%	4.8%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	95.3%	95.4%	97.1%
Irish Traveller	1.9%	2.1%	1.3%
Chinese	0.4%	0.4%	0.2%
Indian	0.0%	0.2%	0.1%
Pakistani	0.0%	0.2%	0.1%
Bangladeshi	0.0%	0.0%	0.0%
Black Caribbean	0.1%	0.1%	0.1%
Black African	0.7%	0.3%	0.4%
Black Other	0.1%	0.2%	0.2%
Mixed	0.4%	0.2%	0.2%
Other	1.0%	1.0%	0.3%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	43.8%	40.8%	42.1%
Catholic	47.9%	48.1%	49.0%
Mixed	0.0%	0.2%	0.2%
Hindu	0.0%	0.0%	0.0%
Jewish	0.0%	0.0%	0.0%
Sikh	0.0%	0.0%	0.0%
Islam	0.0%	0.2%	0.3%
Bhuddist	0.0%	0.0%	0.0%
Orthodox	0.0%	0.0%	0.0%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	2.3%	3.9%	2.3%
No religious belief	6.0%	6.7%	6.1%
TOTAL	100.0%	100.0%	100.0%

Table 4 - Mainstream, Sheltered & Supported Schemes

	2008/09 (Prov)	2007/08	2006/07
Age of Head of Household			
16 - 24	25.4%	25.2%	26.4%
25 - 34	19.4%	20.7%	20.0%
35 - 44	15.6%	15.4%	15.9%
45 - 59	15.6%	15.4%	15.4%
60 - 74	12.0%	12.3%	10.9%
75 plus	12.1%	10.9%	11.3%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	23.5%	24.3%	23.9%
A person with a disability	2.6%	3.3%	3.1%
An elderly person	0.7%	1.0%	0.9%
Head of Household with Disability			
Yes	29.6%	35.1%	30.6%
No	70.4%	64.9%	69.4%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	44.6%	43.1%	44.2%
Female	55.4%	56.9%	55.8%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	10.7%	11.2%	9.9%
Unmarried	60.5%	60.2%	61.4%
Separated	10.7%	10.7%	9.5%
Divorced	5.8%	6.1%	8.4%
Widowed	12.4%	11.8%	10.8%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	96.4%	96.8%	97.8%
Irish Traveller	1.1%	1.0%	0.8%
Chinese	0.4%	0.7%	0.3%
Indian	0.1%	0.1%	0.1%
Pakistani	0.0%	0.1%	0.1%
Bangladeshi	0.0%	0.0%	0.0%
Black Carribean	0.1%	0.1%	0.1%
Black African	0.6%	0.3%	0.3%
Black Other	0.1%	0.1%	0.1%
Mixed	0.4%	0.3%	0.2%
Other	0.7%	0.6%	0.2%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	42.4%	41.1%	43.0%
Catholic	48.3%	48.8%	49.0%
Mixed	0.2%	0.4%	0.2%
Hindu	0.0%	0.0%	0.1%
Jewish	0.0%	0.0%	0.0%
Sikh	0.0%	0.0%	0.0%
Islam	0.1%	0.2%	0.2%
Bhuddist	0.0%	0.1%	0.0%
Orthodox	0.0%	0.0%	0.0%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	3.0%	3.5%	2.1%
No religious belief	6.1%	6.0%	5.2%
TOTAL	100.0%	100.0%	100.0%

Appendix 2: Consultee comments pre-consultation

Organisation	Summary of comments received	Association's response
Carers NI	It is useful to have more detailed explanation of actual policies	Noted
	More interested in Support and Care charges – looking for fairness and consistency	Noted see para 5.3
	Would like to see consistency across HAs and within HA as well as with the regime in the community – aware this is difficult as not always within control of HA	Noted see para 5.3
	Attendance and DLA should not be used to pay support / car	Not applicable for Clanmil Housing
	Practice in Health Trusts may vary but the policy should be the same	Not clear what this means
	Welcomes EQIA on Charging policies and attempt to be as consistent as is possible in the current operational circumstances	Noted
	Slight concern about blanket charging as this assumes there will be equal impact which is not always the case	Not applicable – Clanmil Housing does not apply blanket charging
	If someone wants support through a Trust they are assessed and if accepted a financial assessment is done and the service provided. How do HAs determine who gets service or what is required?	Outside scope of this EQIA - see para 5.3
	Assumptions about individual income should not be made on the basis of household income. Person may only get Carers Allowance of £53 pw - their income is generally much smaller proportionate to household figure.	Outside remit of Clanmil Housing – see para 5.3
	If disabled person has a carer living with and supporting them then carer is providing a lot of service free but disabled person is still being charged	Outside remit of Clanmil Housing – see para 5.3
Disability Action (DA)	The relationship between poverty and disability and age must be drawn in the EQIA	Noted - approximately 70% of tenants in Clanmil Housing schemes for older people are in receipt of Housing Benefit
	The preferred term is refuge alarm not "disabled" refuge alarm in 3.12	Has been amended as requested
	Issues such as Affordability need	Clanmil Housing charging policies

Organisation	Summary of comments received	Association's response
	to be specifically addressed	reflect our mission statement of aiming to be a primary provider of high quality homes at the lowest possible economic rent for everyone in housing need. The Association is a voluntary non-profit making organisation and is a Registered Charity.
	There is no section on Consultation with tenants specifically in accessible ways	Clanmil Housing has consulted with the Tenant Forum re its charging policies, including service charges, rent setting and guest room charges
Gingerbread	Did not comment specifically on the Charging policies but shared general information relating to lone parents	Noted
	<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 	Noted
Multi-Cultural Resource Centre (MCRC)	Charging policies are not the problem – MCRC felt the policy as detailed would not cause adverse impact for those of different races	Noted
	Real issue for people from different countries is getting onto NIHE list so they can be housed – need to be in a hostel first to achieve this.	Outside scope of this EQIA - see para 5.3
	Perception that Asylum Seekers get prioritised but they do not.	Outside scope of this EQIA - see para 5.3
	Same problems as everyone else plus communications	Outside scope of this EQIA - see paras 5.3 and 5.4
	Difficulty is getting deposits, securities and references	Not applicable to Clanmil Housing – we do not take deposits or security or seek references
	Rents are high which impacts on those who have to pay top up	Not applicable to Clanmil Housing – affordable rents are set within Housing Benefit levels
	Private rents are high compared to social housing	Noted
	People from other countries who	Noted - outside scope of this EQIA

Organisation	Summary of comments received	Association's response
	have travelled here to work are often at the lower end of economy so affordability is a real issue	- see para 5.3
	Suggested improvements: <ul style="list-style-type: none"> • Communications • Network and support • Help and sign-posting for accessing systems / knowledge • Some unaware that benefits exist 	Noted – outside scope of this EQIA see para 5.4
	Some people may be wary of trusting any government systems	

Appendix 3 – 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

Appendix 4 – Clanmil Housing Association Rent Setting Policy

RENT SETTING POINTS

DWELLING TYPE	POINTS
Detached House / Bungalow	12
Semi-Detached House / Bungalow	9
Terraced House / Bungalow	8
Flat / maisonette 2 or less storeys	5
Flat / maisonette 3 or more storeys	2
Sheltered Flat	2
Sheltered Bungalow	3
SIZE (Metres Squared)	
<25	10
25 – 30	11
31 – 35	12
36 – 40	13
41 – 45	14
46 – 50	15
51 – 55	16
56 – 60	17
61 – 65	17
66 – 70	18
71 – 75	19
76 – 80	20
81 – 85	21
86 – 90	22
91 – 95	23
96 – 100	24
101 - 105	25
COMMUNAL FACILITIES (Sheltered Dwellings)	
Common Room	1
Assisted Bath/Communal Shower	1
Hairdressing Facility	1
Guest Room	1
Laundry	1
Other	1

HEATING (whole house, ie., central heating)	
1 or 2 bedspace dwelling	1
3 or 4 bedspace dwelling	2
5 or more bedspace dwelling	3
DOUBLE GLAZING (ie., well insulated)	
1 or 2 bedspace dwelling	1
3 or 4 bedspace dwelling	2
5 or more bedspace dwelling	3
HEATING SYSTEM	
Individually Controlled	1
Communal	0
CONDITION OF PROPERTY	
Property requiring rehabilitation	3
Other property	9
CARPARKING	
Garage within curtilage	7
Carparking space within curtilage	3
Two carparking spaces	4
Garage, plus 1 carparking space	10
Garage, plus 2 carparking spaces	11
ACCESS	
Gallery / scissor without control	-7
Gallery / scissor controlled	-5
Communal access without control	-2
Communal access controlled	0
Independent gallery / scissor blocks	-5
Individual Access	0
Lift / Ground floor	2

Appendix 5 – Clanmil Housing Association Rechargeable repair costs

(Extract from Tenant Handbook)

Rechargeable repairs

If repairs, which are your responsibility as the tenant, are carried out by the Association on your behalf a recharge may be levied.

If there is any need to undertake a repair through damage, misuse or neglect by you, your family or visitors. It is the Association's policy to charge you the full cost of undertaking the repair plus an administrative charge. You may be given the opportunity to make good the repair yourself within an agreed time-scale and to an agreed standard.

Please be advised:



If damage is reported to the Association we will give you notice to make good, if you fail to do so we will carry out the repair and this will be recharged.

That the Association will endeavour to complete rechargeable repairs within standard response times but will not be held to these targets.

If a tenant requests a repair from the Association or from Telecare, and this repair is found to be a tenant responsibility the costs incurred may be recharged to the tenant. This may also apply if false or misleading information is given for an alleged Emergency repair, which is later found to be unsubstantiated.

Those payments for any repair you are responsible for will be collected on completion of the repair.

That the recovery of such charges will be invoiced directly to you, which is subject to an administrative charge.

Queries regarding rechargeable repairs should be put in writing to the Maintenance Manager.