



***Equality scheme for Clanmil Housing  
Association***

***Drawn up in accordance with Section 75 and Schedule 9 of  
the Northern Ireland Act 1998***

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Please contact us with your requirements (see page 14 for  
contact details).***

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Association  
Northern Whig House  
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1<sup>st</sup> August 2012

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## Foreword

Section 75 of the Northern Ireland Act 1998 (the Act) requires public authorities, in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations across a range of categories outlined in the Act<sup>1</sup>.

In our equality scheme we set out how Clanmil Housing Association proposes to fulfill the Section 75 statutory duties.

We will commit the necessary resources in terms of people, time and money to make sure that the Section 75 statutory duties are complied with and that the equality scheme is implemented effectively, and on time.

We commit to having effective internal arrangements in place for ensuring our effective compliance with the Section 75 statutory duties and for monitoring and reviewing our progress.

We will develop and deliver a programme of communication and training with the aim of ensuring that all our staff and board members are made fully aware of our equality scheme and understand the commitments and obligations within it. We will develop a programme of awareness raising for our consultees on the Section 75 statutory duties and our commitments in our equality scheme.

We, the Chair and Chief Executive of Clanmil Housing Association, are fully committed to effectively fulfilling our Section 75 statutory duties across all our functions (including service provision, employment and procurement) through the effective implementation of our equality scheme.

We realise the important role that the community and voluntary sector and the general public have to play to ensure the Section 75 statutory duties are effectively implemented. Our equality scheme demonstrates how determined we are to ensure there are opportunities, for people affected by our work, to positively influence how we carry out our functions in line with our Section 75 statutory duties. It also offers the means whereby persons directly

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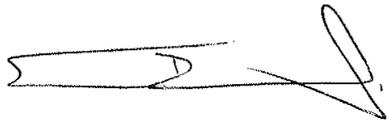
<sup>1</sup> See section 1.1 of our Equality Scheme.

affected by what they consider to be a failure, on our part, to comply with our equality scheme, can make complaints.

On behalf of Clanmil Housing Association, our staff and our Board we are pleased to support and endorse this equality scheme which has been drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 and Equality Commission guidelines.

*Date*

31/07/12



*Joan Baird  
Chair*



*Clare McCarty  
Chief Executive*

# Chapter 1 Introduction

## Section 75 of the Northern Ireland Act 1998

1.1 Section 75 of the Northern Ireland Act 1998 (the Act) requires Clanmil Housing Association to comply with two statutory duties:

### Section 75 (1)

In carrying out our functions relating to Northern Ireland we are required 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.

### Section 75 (2)

In addition, without prejudice to the obligations above, in carrying out our functions in relation to Northern Ireland we are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

“Functions” include the “powers and duties” of a housing association<sup>2</sup>. This includes our employment and procurement functions.

Please see below under “Who we are and what we do” for a detailed explanation of our functions.

<b>How we propose to fulfil the Section 75 duties in relation to the relevant functions of Clanmil Housing Association</b>
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1.2 Schedule 9 4. (1) of the Act requires Clanmil Housing Association as a designated housing association to set out in an equality scheme how it proposes to fulfil the duties imposed by Section 75 in relation to its relevant functions. This equality scheme is intended to fulfil that statutory requirement. It is both a statement of our arrangements for fulfilling the Section 75 statutory duties and our plan for their implementation.

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<sup>2</sup> Section 98 (1) of the Northern Ireland Act 1998.

1.3 Clanmil Housing Association is committed to the discharge of its Section 75 obligations in all parts of our organisation and we will commit the necessary resources in terms of people, time and money to ensure that the Section 75 statutory duties are complied with and that our equality scheme can be implemented effectively.

## **Who We Are & What We Do**

### **About Housing Associations**

A Housing Association is an independent voluntary organisation dedicated to helping people obtain good, affordable housing which meets their needs. A significant proportion of the work they do assists the government in the delivery of much-needed public services but they are not public bodies.

In April 2004 the Registered Housing Associations in Northern Ireland came within the jurisdiction of the Commissioner for Complaints by virtue of Article 146 of The Housing (NI) Order 2003. As a result of this Registered Housing Associations were designated as public authorities for the purposes of Section 75 of the Northern Ireland Act 1998.

Housing associations are regulated by the Department for Social Development (DSD). They work closely with the DSD and the Northern Ireland Housing Executive NIHE to deliver housing and related services. Some also provide care and /or support services so they work with the relevant public authorities for the health sector too. As a result of this situation, housing associations must adhere to a wide range of policies and procedures which have been developed and are owned by a public authority or government department. In such cases associations must operate the policy of another body and have little or no scope to change that policy. For example, housing associations are the main delivery vehicle for the Social Housing Development Programme but need is determined by the NIHE and the Department for Social Housing develops the programme which is then managed by the

Housing Executive. So whilst housing associations may bid to deliver part of that programme they have no powers to shape the programme or establish where new social housing should be built.

In undertaking their Audits of Inequalities and establishing their Action Plans housing associations have therefore been mindful of the need to focus on measures where they have greatest ability to effect change. Where appropriate, potential inequalities identified that are outside the remit of the housing associations will be referred to the relevant public body.

While each designated housing association has produced its own Equality Scheme they have also agreed to work collectively on this major undertaking. Their representative body the Northern Ireland Federation of Housing Associations (NIFHA) is taking a co-ordinating role as part of this collaborative approach to help maximise resources, promote the sharing of best practice and minimise the administrative burden for stakeholder organisations.

### **About Clanmil Housing Association**

Clanmil Housing was established in 1977.

Clanmil Housing is a charitable Housing Association registered with the Department of Social Development. Traditionally the Association built and managed sheltered accommodation for older people. Today it is also involved in housing people with disabilities and special needs through supported housing and providing general family housing.

Its main role is 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.

The Board of Management of the Housing Association comprises the Chair and 13 other members appointed by the Board of Management. The Board of Management reflects a range of skills and abilities, representing the interests of users of the service. The current membership is Chair, Joan Baird MSc, FCIH, Vice

Chair Jennifer Ebbage LL.B (Hons) CPLS and members Mr J Browne BA DipM MCIM, Mr CT Hogg MBE, UD, JP, DL, Mr S Kirkwood OBE TD MICE, Mr D Long, Ms M O'Boyle CQSW ASW, Ms C Ramsey BSC (Hons) Dip TP, Dip BA, MRTPI, Mr P Anderson CFIIA, MBA, Ms M Shields JP, Mr D Reid LL.B FCA, Mr S Amos BA ACIB, Mrs J Scott LL.B (Hons), Mr J Gill.

Clanmil Housing Association currently owns and manages 2,985 units of housing which are broken down as follows:

- 1548 general family housing
- 1028 units for sheltered/independent living for over 55's
- 232 units for active elderly
- 82 units of supported housing (mental ill health and dementia)
- 48 units in hostels for those who suffered domestic violence
- 41 Housing with Care units (residential care for older people)
- 6 units of grouped housing for Irish Travellers.

Clanmil Housing Association employees 213 employees across sites in Northern Ireland.

In November 2011, Dungannon & District Housing Association merged with Clanmil Housing Association.

Clanmil Housing Association is a member of the Abacus Procurement Group, made up of the following member Housing Associations: Abbeyfield, Ark, Connswater, Hearth, Helm, Oaklee, Open Door, South Ulster, Ulidia, Wesley.

The functions of the Housing Association for purposes of the Act include its powers and duties. In this Scheme the following are to be regarded as the functions:

Provision of a range of housing, support and care services, the development of new social housing, the maintenance of all properties and the employment of staff.

## **Chapter 2      Our arrangements for assessing our compliance with the section 75 duties** (Schedule 9 4. (2) (a))

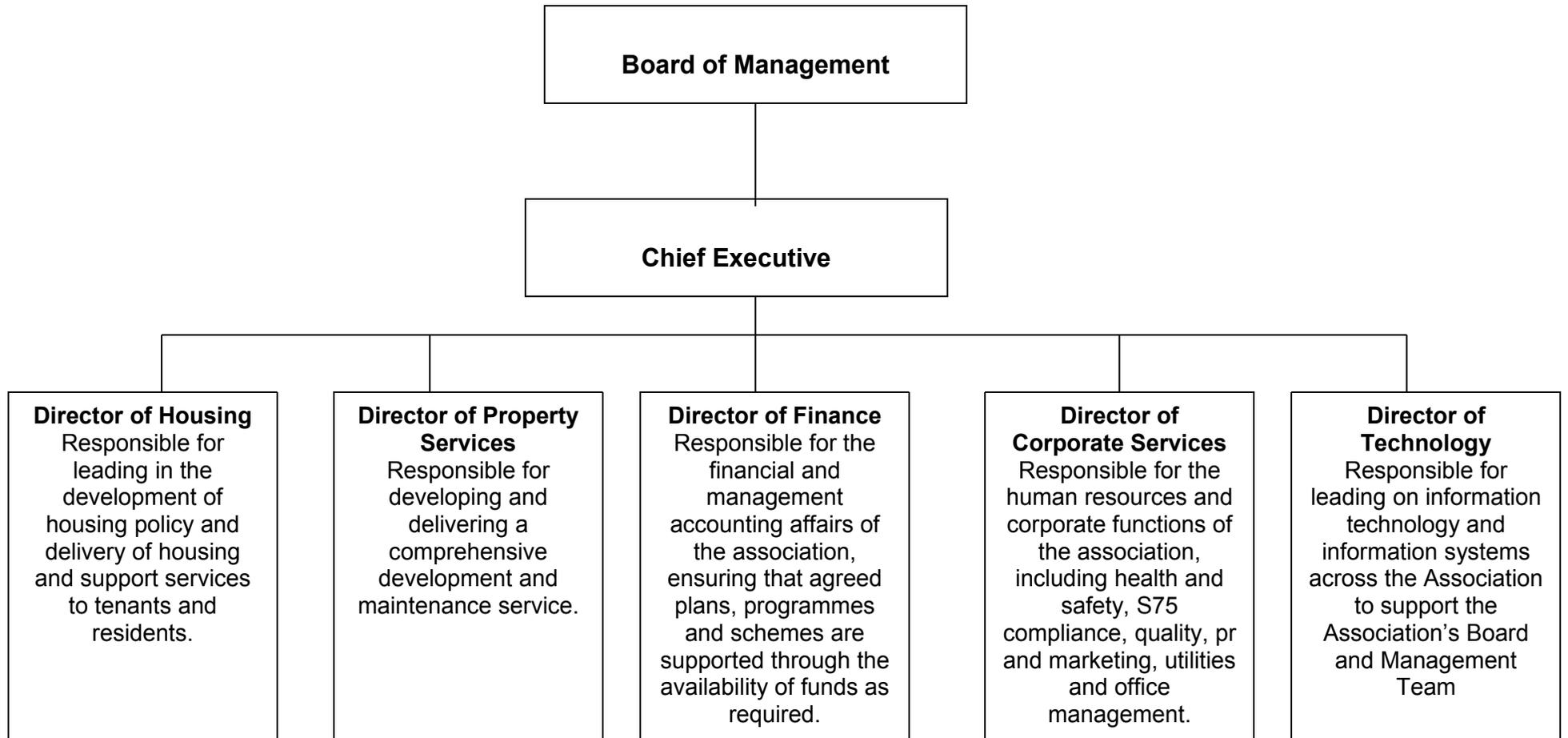
2.1 Some of our arrangements for assessing our compliance with the Section 75 statutory duties are outlined in other relevant parts of this equality scheme: Section 3 – Our arrangements for consultation, Chapter 4 – Our arrangements for assessing, monitoring and publishing the impact of policies, Chapter 6 – Our arrangements for ensuring and assessing public access to information and services we provide and Chapter 8 – Complaints.

In addition we have the following arrangements in place for assessing our compliance:

Responsibilities and Reporting
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2.2 We are committed to the fulfilment of our Section 75 obligations in all parts of our work.

The following page is an illustrative organisational chart which shows the Associations internal arrangements which have been established for dealing with and reporting on the effective implementation of the Section 75 statutory duties.



2.3 Responsibility for the effective implementation of our equality scheme lies with the Chief Executive. The Chief Executive is accountable to the Board of Management for Clanmil Housing Association for the development, implementation, maintenance and review of the equality scheme in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998, including any good practice or guidance that has been or may be issued by the Equality Commission.

2.4 If you have any questions or comments regarding our equality scheme, please contact in the first instance the Corporate Services Department at the address given below and we will respond to you as soon as possible:

Corporate Services Department  
Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Direct Dial No: 028 9087 6011  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email : [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

2.5 Objectives and targets relating to the statutory duties will be integrated into our strategic and operational business plans<sup>3</sup>.

2.6 Employees' job descriptions and annual appraisals reflect their contributions to the discharge of the Section 75 statutory duties and implementation of the equality scheme, where relevant. The annual appraisals may be subject to review and summary in the annual performance return.

2.7 Clanmil Housing Association prepares an annual report on the progress we have made on implementing the arrangements set out in this equality scheme to discharge our Section 75 statutory duties (Section 75 annual progress report).

The Section 75 annual progress report will be sent to the Equality Commission by 31 August each year and will follow any guidance on annual reporting issued by the Equality Commission.

Progress on the delivery of Section 75 statutory duties will also be included in our (organisational) annual report.

2.8 The latest Section 75 annual progress report for Clanmil Housing is available on our website

<http://www.clanmil.org/equalitycomm.php>

or by contacting:

Corporate Services Department  
Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Direct Dial No: 028 9087 6011  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email : [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

<sup>3</sup> See Appendix 4 'Timetable for measures proposed' and section 2.11 of this equality scheme.

2.9 Clanmil Housing Association liaise closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.

Action plan/action measures
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2.10 Clanmil Housing Association have developed an action plan to promote equality of opportunity and good relations. This action plan is set out in Appendix 6 to this equality scheme.

2.11 The action measures that will make up our action plan will be relevant to our functions. They will be developed and prioritised on the basis of an audit of inequalities. The audit of inequalities will gather and analyse information across the Section 75 categories<sup>4</sup> to identify the inequalities that exist for our service users and those affected by our policies<sup>5</sup>. The Audit of Inequalities remains a live document, subject to review and amendment. Where there appears to be gaps in the audit statistics, Clanmil Housing Association will commit to working with member organisations to gather additional research.

2.12 Action measures will be specific, measurable, linked to achievable outcomes, realistic and time bound. Action measures will include performance indicators and timescales for their achievement.

2.13 We will develop any action plans for a period of between one and five years in order to align them with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.

2.14 We will seek input from our stakeholders and consult on our action plan before we send it to the Equality Commission and thereafter when reviewing the plan as per 2.16 below.

2.15 We will monitor our progress on the delivery of our action measures annually and update the action plan as necessary to

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<sup>4</sup> See section 1.1 of this equality scheme for a list of these categories.

<sup>5</sup> See section 4.1 of this equality scheme for a definition of policies.

ensure that it remains effective and relevant to our functions and work.

2.16 Clanmil Housing Association will inform the Commission of any changes or amendments to our action plan and will also include this information in our Section 75 annual progress report to the Commission. Our Section 75 annual progress report will incorporate information on progress we have made in implementing our action plans/action measures.

2.17 Once finalised, our action plan will be available on request from:

Corporate Services Department  
Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Direct Dial No: 028 9087 6011  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email : [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

or from our website at: <http://www.clanmil.org/equalitymatters.php>

If you require it in an alternative format please contact us on the details provided.

## **Chapter 3 Our arrangements for consulting**

(Schedule 9 4. (2) (a)) - on matters to which a duty (S75 (1) or (2)) is likely to be relevant (including details of the persons to be consulted).

(Schedule 9 4. (2) (b)) on the likely impact of policies adopted or proposed to be adopted by us on the promotion of equality of opportunity.

3.1 We recognise the importance of consultation in all aspects of the implementation of our statutory equality duties. We will consult on our equality scheme, action measures, equality impact assessments and other matters relevant to the Section 75 statutory duties.

3.2 We are committed to carrying out consultation in accordance with the following principles (as contained in the Equality Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*')

3.2.1 All consultations will seek the views of those directly affected by the matter/policy, the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary and community groups, our staff and their trades unions and such other groups who have a legitimate interest in the matter, whether or not they have a direct economic or personal interest.

Initially all consultees (see *Appendix 3*), as a matter of course, will be notified (by email or post) of the matter/policy being consulted upon to ensure they are aware of all consultations. Thereafter, to ensure the most effective use of our and our consultees' resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance. This may include for example regional or local consultations, sectoral or thematic consultation etc.

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 Statutory Equality duties. NIFHA itself is not a designated body, but as part of our support for members has taken on this co-ordination role, in particular in relation to public consultation. Our aim in managing the process in this way is to minimise the impact on consultee and/or stakeholder organisations. However, throughout each formal consultation exercise the relevant documents will also be available, in a range of formats including hard copies, directly from Clanmil Housing Association.

3.2.2 Consultation with all stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation could include:

- Face-to-face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/opt out of the consultation
- Internet discussions or
- Telephone consultations.

This list is not exhaustive and we may develop other additional methods of consultation more appropriate to key stakeholders and the matter being consulted upon. We will ensure that all consultees have equal time to respond, particularly where there are special requirements for information in alternative formats.

3.2.3 We will consider the accessibility and format of every method of consultation we use in order to remove barriers to the consultation process. Specific consideration will be given as to how best to communicate with children and young people, people with disabilities (in particular people with learning disabilities) and minority ethnic communities. We take account of existing and developing good practice, including the Equality Commission's guidance *Let's Talk Let's Listen – Guidance for public authorities on consulting and involving children and young people (2008)*.

Information will be made available, on request, in alternative formats<sup>6</sup>, in a timely manner, usually within 3 working days. We will ensure that such consultees have equal time to respond.

3.2.4 Specific training is provided to those facilitating consultations to ensure that they have the necessary skills to communicate effectively with consultees.

3.2.5 To ensure effective consultation with consultees<sup>7</sup> on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking the following:

- Meetings with tenants through the Tenant Forum – Older People & Neighbourhoods
- Meetings and briefing papers with staff
- Meetings with representative stakeholder groups
- Public media – advertising and circulation
- Public consultation exercise
- Availability of information on website
- Articles in the Staff Newsletter and Clanmil Chronicle – tenant publication

3.2.6 The consultation period will last for a minimum of twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. However, in exceptional circumstances when this timescale is not feasible (for example implementing EU Directives or UK wide legislation, meeting Health and Safety requirements, addressing urgent public health matters or complying with Court judgements), we may shorten timescales to eight weeks or less before the policy is implemented. We may continue consultation thereafter and will review the policy as part of our monitoring commitments<sup>8</sup>.

Where, under these exceptional circumstances, we must implement a policy immediately, as it is beyond our authority's control, we may consult after implementation of the policy, in order to ensure that any impacts of the policy are considered.

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<sup>6</sup> See Chapter 6 of our equality scheme for further information on alternative formats of information we provide.

<sup>7</sup> Please see Appendix 3 for a list of our consultees.

<sup>8</sup> Please see below at 4.27 to 4.31 for details on monitoring.

3.2.7 Clanmil Housing Association are committed to avoiding consultations over holiday periods. However, if a consultation exercise is to take place over a period when consultees are less able to respond, for example, over the summer or Christmas break, or if the policy under consideration is particularly complex, we will give consideration to the feasibility of allowing a longer period for the consultation.

3.2.8 We are conscious of the fact that affected individuals and representative groups may have different needs. We will take appropriate measures to ensure full participation in any meetings that are held. We will consider for example the time of day, the appropriateness of the venue, in particular whether it can be accessed by those with disabilities, how the meeting is to be conducted, the use of appropriate language, whether a signer and/or interpreter is necessary, and whether the provision of childcare and support for other carers is required.

3.2.9 We make all relevant information available to consultees in appropriate formats to ensure meaningful consultation. This includes detailed information on the policy proposal being consulted upon and any relevant quantitative and qualitative data.

3.2.10 In making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy.

3.2.11 We provide feedback to consultees in a timely manner. A feedback report is prepared which includes summary information on the policy consulted upon, a summary of consultees' comments and a summary of our consideration of and response to consultees' input. The feedback is provided in formats suitable to consultees. (Please see also 6.3)

3.3 A list of our consultees is included in this equality scheme at Appendix 3. It can also be obtained from our website at

<http://www.clanmil.org/equalitycomm.php>

or by contacting

Corporate Services Department

Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Direct Dial No: 028 9087 6011  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email: [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

3.4 Our consultation list is not exhaustive and is reviewed on an annual basis to ensure it remains relevant to our functions and policies. The consultee list is available from the Associations website.

We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees. Please contact Bernadette O'Donnell, Corporate Services Assistant to provide your contact details and have your areas of interest noted or have your name/details removed or amended. Please also inform us at this stage if you would like information sent to you in a particular format or language.

## **monitoring and publishing the impact of policies**

(Schedule 9 4. (2) (b); Schedule 9 4. (2) (c);  
Schedule 9 4. (2) (d); Schedule 9 9. (1);  
Schedule 9 9.(2))

**Our arrangements for assessing the likely impact of policies adopted or proposed to be adopted on the promotion of equality of opportunity (Schedule 9 4. (2) (b))**

4.1 In the context of Section 75, 'policy' is very broadly defined and it covers all the ways in which we carry out or propose to carry out our functions in relation to Northern Ireland. In respect of this equality scheme, the term policy is used for any (proposed/amended/existing) strategy, policy initiative or practice and/or decision, whether written or unwritten and irrespective of the label given to it, eg, 'draft', 'pilot', 'high level' or 'sectoral'.

4.2 In making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy, as required by Schedule 9 9. (2) of the Northern Ireland Act 1998.

4.3 Clanmil Housing Association uses the tools of **screening** and **equality impact assessment** to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance:

- the guidance on screening, including the screening template, as detailed in the Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*' and
- on undertaking an equality impact assessment as detailed in the Commission's guidance '*Practical guidance on equality impact assessment (February 2005)*'.

## Screening

4.4 The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations.

4.5 Screening is completed at the earliest opportunity in the policy development/review process. Policies which we propose to adopt will be subject to screening prior to implementation. For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages during implementation.

4.6 The lead role in the screening of a policy is taken by the policy decision maker who has the authority to make changes to that policy. However, screening will also involve other relevant team members, for example, equality specialists, those who implement the policy and staff members from other relevant work areas. Where possible we may include key stakeholders in the screening process. Those responsible for screening policies will be included in specialist training.

4.7 The following questions are applied to all our policies as part of the screening process:

- What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? (minor/major/none)
- Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?
- To what extent is the policy likely to impact on good relations between people of a different religious belief, political opinion or racial group? (minor/major/none)
- Are there opportunities to better promote good relations between people of a different religious belief, political opinion or racial group?

4.8 In order to answer the screening questions, we gather all relevant information and data, both qualitative and quantitative. In taking this evidence into account we consider the different needs, experiences and priorities for each of the Section 75 equality categories. Any screening decision will be informed by this evidence.

4.9 Completion of screening, taking into account our consideration of the answers to all four screening questions set out in 4.7 above, will lead to one of the following three outcomes:

1. the policy has been 'screened in' for equality impact assessment
2. the policy has been 'screened out' with mitigation<sup>9</sup> or an alternative policy proposed to be adopted
3. the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

4.10 If our screening concludes that the likely impact of a policy is 'minor' in respect of one, or more, of the equality of opportunity and/or good relations categories, we may on occasion decide to proceed with an equality impact assessment, depending on the policy. If an EQIA is not to be conducted we will nonetheless consider measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations.

Where we mitigate we will outline in our screening template the reasons to support this decision together with the proposed changes, amendments or alternative policy.

This screening decision will be 'signed off' by the appropriate policy lead, with a responsibility for the policy, within Clanmil Housing Association.

4.11 If our screening concludes that the likely impact of a policy is 'major' in respect of one, or more, of the equality of opportunity and/or good relations categories, we will normally subject the policy to an equality impact assessment. This screening decision

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<sup>9</sup> Mitigation – Where an assessment (screening in this case) reveals that a particular policy has an adverse impact on equality of opportunity and / or good relations, a housing association must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories.

will be 'signed off' by the appropriate policy lead within Clanmil Housing Association.

4.12 If our screening concludes that the likely impact of a policy is 'none', in respect of all of the equality of opportunity and/or good relations categories, we may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, we will give details of the reasons for the decision taken. This screening decision will be 'signed off' by the appropriate policy lead within Clanmil Housing Association.

4.13 As soon as possible following the completion of the screening process, a summary of the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on our website:

<http://www.clanmil.org/equalitymatters.php>

and on request:

Corporate Services Department  
Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Direct Dial No: 028 9087 6011  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email: [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

4.14 If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, we will review the screening decision.

4.15 Our screening reports are published quarterly [see below at 4.20 - 4.22 and 4.23 for details].

## **Equality Impact Assessment**

4.16 An equality impact assessment (EQIA) is a thorough and systematic analysis of a policy, whether that policy is formal or informal, and irrespective of the scope of that policy. The primary function of an EQIA is to determine the extent of any impact of a policy upon the Section 75 categories and to determine if the impact is an adverse one. It is also an opportunity to demonstrate the likely positive outcomes of a policy and to seek ways to more effectively promote equality of opportunity and good relations.

4.17 Once a policy is screened and screening has identified that an equality impact assessment is necessary, we will carry out the EQIA in accordance with Equality Commission guidance. The equality impact assessment will be carried out as part of the policy development process, before the policy is implemented.

4.18 Any equality impact assessment will be subject to consultation at the appropriate stage(s). (For details see above Chapter 3 “Our Arrangements for Consulting”).

### **Our arrangements for publishing the results of the assessments of the likely impact of policies we have adopted or propose to adopt on the promotion of equality of opportunity**

(Schedule 9 4. (2) (d); Schedule 9 9. (1))

4.19 We make publicly available the results of our assessments (screening and EQIA) of the likely impact of our policies on the promotion of equality of opportunity and good relations.

#### 4.20 Screening reports

These are published quarterly. Screening reports detail:

- A list of all policies screened by Clanmil Housing Association over the three month period
- A statement of the aim(s) of the policy/policies to which the assessment relates
- Consideration given to measures which might mitigate any adverse impact

- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity;
- Screening decisions, i.e:
  - whether the policy has been 'screened in' for equality impact assessment.
  - whether the policy has been 'screened out' with mitigation or an alternative policy proposed to be adopted.
  - whether the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.
- Where applicable, a timetable for conducting equality impact assessments
- A link to the completed screening template(s) on our website

#### 4.21 Screening templates

For details on the availability of our screening templates please refer to 4.13.

#### 4.22 Equality impact assessments

EQIA reports are published once the impact assessment has been completed. These reports include:

- A statement of the aim of the policy assessed
- Information and data collected
- Details of the assessment of impact(s)
- Consideration given to measures which might mitigate any adverse impact
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity
- Consultation responses
- The decision taken
- Future monitoring plans.

### **How we publish the information**

4.23 All information we publish is accessible and can be made available in alternative formats on request. Please see 6.3 below.

### **Where we publish the information**

4.24 The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are and will be available on our website

<http://www.clanmil.org/equalitymatters.php>

and by contacting:

Corporate Services Department  
Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Direct Dial No: 028 9087 6011  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email: [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

4.25 In addition to the above, a summary of screening reports (electronic link or hard copy on request if more suitable for recipients) which include all policies screened over a 3 month period are also sent directly to all consultees on a quarterly basis.

4.26 We will inform the general public about the availability of this material through communications such as press releases where appropriate.

## **Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity**

(Schedule 9 4. (2) (c))

The Association will make arrangements to obtain relevant information, whether quantitative or qualitative, so that it can clearly demonstrate why a policy is screened in for impact assessment or screened out as not requiring an equality impact assessment.

Evidence may include information from the Associations own information management systems, including:

- service monitoring
- complaints handling systems
- engagement in research
- surveys or consultation exercises

Information may also be sourced from commissioned research or from research produced by other public authorities, representative groups, umbrella groups, and trades unions or universities. Information from consultation exercises on previous equality impact assessments, or those undertaken by other public authorities within the same sector will also be considered. Anecdotal evidence, feedback from service users and affected groups or ongoing experience within the authority will also be considered.

## **Monitoring Adverse Impact and Access to Services**

A system will be established to monitor the impact of policies and access to services across all functions in order to identify their effects on the relevant groups and ensure equality of opportunity. This system will involve:

- an audit of existing information systems within one year of approval of the scheme, to identify the extent of current monitoring and a plan to address any gaps so that impacts can effectively be monitored through equality impact assessments.
- the collection and collation of existing relevant primary quantitative and qualitative data across all nine equality categories on an ongoing basis;
- the collection and collation of existing relevant secondary sources of quantitative and qualitative data across all nine equality categories on an ongoing basis;
- identifying where more detailed data is needed in order to have the necessary information on which to base decisions;
- undertaking or commissioning new data if necessary.

This system will be reviewed on an annual basis and the results will be published as part of the Associations annual report to the Equality Commission. In all cases relating to the holding of monitoring information or the collection of data, the Association will act sensitively in accordance with Equality Commission guidance and the wishes of representatives from S75 organisations.

4.27 Monitoring can assist us to deliver better public services and continuous improvements. Monitoring Section 75 information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc). In order to carry out monitoring in a confidential and effective manner, Clanmil Housing Association follows guidance from the Office of the Information Commissioner and the Equality Commission.

4.28 We monitor any adverse impact on the promotion of equality of opportunity of policies we have adopted. We are also committed to monitoring more broadly to identify opportunities to better promote equality of opportunity and good relations in line with Equality Commission guidance.

4.29 The systems we have established to monitor the impact of policies and identify opportunities to better promote equality of opportunity and good relations are:

- The collection, collation and analysis of existing relevant primary quantitative and qualitative data across all nine equality categories on an ongoing basis
- The collection, collation and analysis of existing relevant secondary sources of quantitative and qualitative data across all nine equality categories on an ongoing basis
- An audit of existing information systems within one year of approval of this equality scheme, to identify the extent of current monitoring and take action to address any gaps in order to have the necessary information on which to base decisions
- Undertaking or commissioning new data if necessary.

4.30 If over a two year period monitoring and evaluation show that a policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, we will ensure that the policy is revised to achieve better outcomes for relevant equality groups.

4.31 We review our EQIA monitoring information on an annual basis. Other monitoring information is reviewed monthly, quarterly and annually.

The Association will make publicly available the outcome of any equality impact assessment and of any monitoring undertaken to measure the adverse impact of policies. Systems will also be established to make available, on request, impact assessments in accessible formats and a timely fashion (i.e. Braille, disk, audio cassette and minority languages) from the responsible officer.

Extra consideration will be given to ensure that young people and those with learning disabilities are able to access impact assessments in a timely fashion.

The Association will inform the general public about the availability of this material through public relations such as press releases and media coverage. It will also directly inform bodies listed in Appendix 2 when this material is available and it will place information in publications associated with Section 75 categories.

## **Our arrangements for publishing the results of our monitoring**

(Schedule 9 4. (2) (d))

4.32 Schedule 9 4. (2) (d) requires us to publish the results of the monitoring of adverse impacts of policies we have adopted. However, we are committed to monitoring more broadly and the results of our policy monitoring are published as follows:

4.33 EQIA monitoring information is published as part of our Section 75 annual progress report [see 2.7]

4.34 The Association is committed to ensuring that the information it disseminates and the services it provides are made accessible to ensure equality of opportunity. It is aware that some groups will not have the same access to information as others. These include:

- children and young people who may have difficulties in accessing or understanding information;
- people with sensory and learning disabilities that may have difficulties with information in print;
- members of minority ethnic groups, whose first language is not English, and who may have difficulties with information provided only in English.

Consideration will be given on how to provide accessible information in a timely manner to all these groups.

The Association will, within a year of approval of this scheme, review its arrangements for providing information in Braille, large print, audio cassette and minority ethnic language formats, ensuring where possible linguistic equality. The assessment will take account of:

- the statutory requirements of the Disability Discrimination Act 1995; the likely demand for information of various formats across its main policy areas;
- the resource implications and recommendations from the Northern Ireland cross-departmental Promoting Social Inclusion (PSI) working groups on minority ethnic people and on access to information.

The review will make recommendations on how public access to information can be better ensured by improving arrangements for providing information in different formats and languages. The Association will ensure that it will publicise the current situation, the findings of its review, and any proposed changes to any aspect of information and services to such groups and individuals.

In disseminating information through the media, the Association will seek to advertise in the press. This arrangement will be kept under review, in terms of promoting wide access throughout the implementation of statutory equality duties. The Association intends that all of its services are fully accessible to all parts of the community in Northern Ireland.

The Association will ensure that no section of the community is deterred from visiting Clanmil Housing offices, for whatever reason. Clanmil Housing offices will maintain a welcoming and harmonious environment. Clanmil Housing will adhere to relevant provisions of the Disability Discrimination Act 1995.

4.35 All information published is accessible and can be made available in alternative formats on request. Please see below at 6.3 for details.

## **Chapter 5      Staff training**

(Schedule 9 4.(2) (e))

### **Commitment to staff training**

5.1 We recognise that awareness raising and training play a crucial role in the effective implementation of our Section 75 duties.

5.2 Our Chief Executive wishes to positively communicate the commitment of Clanmil Housing Association to the Section 75 statutory duties, both internally and externally.

To this end we have introduced an effective communication and training programme for all staff and will ensure that our commitment to the Section 75 statutory duties is made clear in all relevant publications.

### **Training objectives**

5.3 Clanmil Housing Association will draw up/has drawn up a detailed training plan for its staff which will aim to achieve the following objectives:

- to raise awareness of the provisions of Section 75 of the Northern Ireland Act 1998, our equality scheme commitments and the particular issues likely to affect people across the range of Section 75 categories, to ensure that our staff fully understand their role in implementing the scheme
- to provide those staff involved in the assessment of policies (screening and EQIA) with the necessary skills and knowledge to do this work effectively
- to provide those staff who deal with complaints in relation to compliance with our equality scheme with the necessary skills and knowledge to investigate and monitor complaints effectively
- to provide those staff involved in consultation processes with the necessary skills and knowledge to do this work effectively

- to provide those staff involved in the implementation and monitoring of the effective implementation of the Clanmil Housing Association equality scheme with the necessary skills and knowledge to do this work effectively.

### **Awareness raising and training arrangements**

5.4 The following arrangements are in place to ensure all our staff and board members are aware of and understand our equality obligations.

- We will develop a summary of this equality scheme and make it available to all staff.
- We will provide access to copies of the full equality scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.
- Staff in Clanmil Housing Association will receive a briefing on this equality scheme as follows:
  - Awareness of new requirements of the scheme within the 12 week consultation period
  - Briefing on the scheme within 6 weeks after approval
  - Inductions – within first 8 weeks of employment
  - Formal training on Equality at Work/Understanding of Equality Duties – within first 6 months of employment
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within Clanmil Housing Association who are directly engaged in taking forward the implementation of our equality scheme commitments (for example those involved in research and data collection, policy development, service design, conducting equality impact assessments, consultation, monitoring and evaluation).
- Where appropriate, training will be provided to ensure staff are aware of the issues experienced by the range of Section 75 groups, in particular those staff with a responsibility for policy development.
- When appropriate and on an ongoing basis, arrangements will be made to ensure staff are kept up to date with Section 75 developments.

All training will be developed in association with the appropriate Section 75 groups.

The Chief Executive wishes to positively communicate the commitment of the Association to the statutory duties (both internally and externally). Clanmil Housing will:

- develop a summary of the Scheme and make it available to all staff ;
- provide access to copies of the full Scheme for all staff;
- ensure that the Housing association 's commitment to the statutory duties are made clear in Association publications (such as the Annual Report); and
- will ensure that any queries or questions of clarification from staff are addressed effectively.

5.5 Training and awareness raising programmes will, where relevant, be developed in association with the appropriate Section 75 groups and our staff.

In order to share resources and expertise, Clanmil Housing Association will, where possible, work closely with other bodies and agencies and the training provider in the development of the training contents and delivery of training.

### **Monitoring and evaluation**

5.6 Our training programme is subject to the following monitoring and evaluation arrangements:

- We evaluate the extent to which all participants in this training programme have acquired the necessary skills and knowledge to achieve each of the above objectives.
- The extent to which training objectives have been met will be reported on as part of the Section 75 annual progress report, which will be sent to the Equality Commission.

## **Chapter 6 Our arrangements for ensuring and assessing public access to information and services we provide**

(Schedule 9 4. (2) (f))

6.1 Clanmil Housing Association are/is committed to ensuring that the information we disseminate and the services we provide are fully accessible to all parts of the community in Northern Ireland. We keep our arrangements under review to ensure that this remains the case.

6.2 We are aware that some groups will not have the same access to information as others.

In particular:

- People with sensory, learning, communication and mobility disabilities may require printed information in other formats.
- Members of ethnic minority groups, whose first language is not English, may have difficulties with information provided only in English.
- Children and young people may not be able to fully access or understand information.

### **Access to information**

6.3 To ensure equality of opportunity in accessing information, we provide information in alternative formats on request, where reasonably practicable. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

Alternative formats may include Easy Read, Braille, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language.

Clanmil Housing Association liaises with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.

We will acknowledge a request within 3 days and respond to requests for information in alternative formats in a timely manner, usually within 2 weeks (dependent on the scale and urgency of the request).

The following arrangements will be made for the publication of the Scheme and to ensure equality of access:

- the Scheme will be available on request in formats such as Braille, disc, and audiocassette and in minority languages to meet the needs of those not fluent in English;
- specific consideration will also be given to how best to communicate the Scheme to young people and those with learning disabilities;
- the Association will develop a plain English summary of the Scheme;
- a press release and a prominent advertisement in the press will be placed by the Association whenever the Scheme is approved by the Equality Commission;
- a copy of the Scheme will also be posted on the Associations website;
- copies of the approved Scheme will also be sent to key stakeholders.

6.4 In disseminating information through the media we will seek to advertise in the press where appropriate.

6.5 The Association will, within a year of approval of this scheme, review its arrangements for providing information in Braille, large print, audio cassette and minority ethnic language formats, ensuring where possible linguistic equality. The assessment will take account of:

- the statutory requirements of the Disability Discrimination Act 1995; the likely demand for information of various formats across its main policy areas;
- the resource implications and recommendations from the Northern Ireland cross-departmental Promoting Social Inclusion (PSI) working groups on minority ethnic people and on access to information.

The review will make recommendations on how public access to information can be better ensured by improving arrangements for providing information in different formats and

languages. The Association will ensure that it will publicise the current situation, the findings of its review, and any proposed changes to any aspect of information and services to such groups and individuals.

In disseminating information through the media, the Association, in collaboration with NIFHA, will seek to advertise in the press. This arrangement will be kept under review, in terms of promoting wide access throughout the implementation of statutory equality duties. The Association intends that all of its services are fully accessible to all parts of the community in Northern Ireland.

### **Access to services**

6.6 Clanmil Housing Association are committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories.

Clanmil Housing Association also adheres to the relevant provisions of current anti-discrimination legislation.

- 6.7 Clanmil Housing provides access to our services by:
- Adhering to the Common Selection Scheme for housing allocations
  - Advertising in communities the services and housing provided
  - Promoting services through local media
  - Engaging with politicians on provision of services
  - Outreach and cross-denominational activities at schemes
  - Publications such as corporate brochures
  - Telecare 24-hour per day provision of services for Clanmil tenants
  - Updated information on our website

## **Assessing public access to information and services**

6.8 We monitor quarterly and annually across all our functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted.

6.9 We monitor the following information and services:

- Complaints
- Survey tenants / tenant satisfaction surveys
- NICORE stats for new tenants
- Employment statistics
- Maintenance performance
- Financial programme

## **Chapter 7 Timetable for measures we propose in this equality scheme**

(Schedule 9 4. (3) (b))

- 7.1 Appendix 4 outlines our timetable for all measures proposed within this equality scheme. The measures outlined in this timetable will be incorporated into our business planning processes.
- 7.2 This timetable is different from and in addition to our commitment to developing action plans/action measures to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our equality scheme a commitment to develop an action plan and timetable the implementation of the action plan. Accordingly, this commitment it is listed in the timetable of measures at Appendix 4. For information on these action measures please see above at 2.11 – 2.18.

## **Chapter 8      Our complaints procedure**

(Schedule 9 10.)

8.1 Clanmil Housing Association is responsive to the views of members of the public and we aim to resolve all complaints that we receive in a timely manner.

8.2 Schedule 9 paragraph 10 of the Act refers to complaints. A person can make a complaint to a housing association if the complainant believes he or she may have been directly affected by an alleged failure of the authority to comply with its approved equality scheme.

If the complaint has not been resolved within a reasonable timescale, the complaint can be brought to the Equality Commission.

8.3 A person wishing to make a complaint that Clanmil Housing Association have failed to comply with its approved equality scheme should contact:

Jim Pow  
Business Improvement Manager  
Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email: [jim.pow@clanmil.org.uk](mailto:jim.pow@clanmil.org.uk)

8.4 We will in the first instance acknowledge receipt of each complaint within 3 days.

8.5 The Departmental Manager or person appointed for dealing with the complaint will carry out an internal investigation of the complaint and will respond substantively to the complainant within 10 working days of the date of receiving the letter of complaint.

Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended, however where this is the case the complainant will be advised of the expected completion date. It is likely that the investigations will not exceed 2 months.

8.6 During this process the complainant will be kept fully informed of the progress of the investigation into the complaint and of any outcomes.

8.7 Clanmil Housing Association are committed to ensuring access for all to the complaints policy. This will include making adjustments on request, such as interpreter services, advocacy services etc to enable the complaint to be resolved.

8.8 In any subsequent investigation by the Equality Commission, Clanmil Housing Association will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

Similarly, Clanmil Housing Association will co-operate fully with any investigation by the Equality Commission under subparagraph 11 (1) (b) of Schedule 9 to the Northern Ireland Act 1998.

8.9 Clanmil Housing Association will make all efforts to implement promptly and in full any recommendations arising out of any Commission investigation.

## **Chapter 9      Publication of our equality scheme** (Schedule 9 4. (3) (c))

9.1 Clanmil Housing Association's equality scheme is available free of charge in print form and alternative formats from:

Corporate Services Department  
Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel : 028 90 876000  
Direct Dial No: 028 9087 6011  
Fax: 028 90 876001  
Textphone: 028 90 329914  
Email: [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

9.2 Our equality scheme is also available on our website at:  
<http://www.clanmil.org/equalitycomm.php>

9.3 The following arrangements are in place for the publication in a timely manner of our equality scheme to ensure equality of access:

- We will make every effort to communicate widely the existence and content of our equality scheme. This may include press releases, prominent advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a link to our approved equality scheme to our consultees on our consultation lists. Other consultees without e-mail will be notified by letter that the scheme is available on request. We will respond to requests for the equality scheme in alternative formats in a timely manner, usually within 3 working days.

- We will promote the scheme to representatives from Interest groups across the nine categories.
- We will publish the scheme on the Clanmil website within one week of the submission date on 1<sup>st</sup> August 2012.
- We will supply an Easy Read version to all our tenants whilst the scheme is in draft to aid their understanding.
- We will refer to the Children's Commissioner to discuss the best method of communicating the Equality Scheme to children and young people, and consider setting up a youth forum within Clanmil to specifically look at communication methods for this age group.
- Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats ( CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English. We will endeavour to provide alternative formats within 2 weeks of request. Any reasons for variations to this timescale will be considered by Head of Department.

9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme, or contact

Corporate Services Department  
 Northern Whig House  
 3 Waring Street  
 Belfast  
 BT1 2DX

Tel : 028 90 876000  
 Direct Dial No: 028 9087 6011  
 Fax: 028 90 876001  
 Textphone: 028 90 329914  
 Email: [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

## **Chapter 10    Review of our equality scheme**

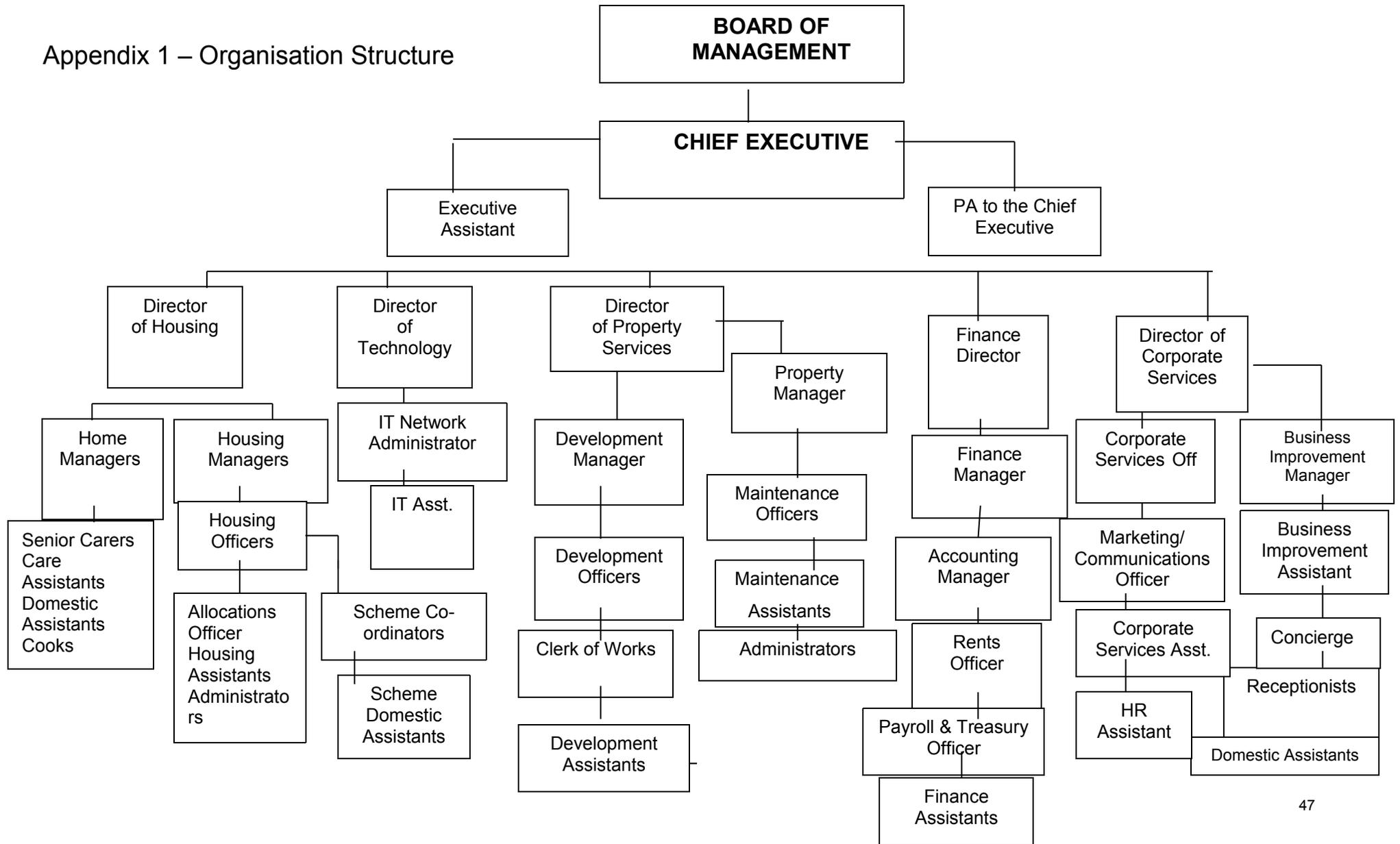
(Schedule 9 8. (3))

10.1 As required by Schedule 9 paragraph 8 (3) of the Northern Ireland Act 1998 we will conduct a thorough review of this equality scheme. This review will take place either within five years of submission of this equality scheme to the Equality Commission or within a shorter timescale to allow alignment with the review of other planning cycles.

The review will evaluate the effectiveness of our scheme in relation to the implementation of the Section 75 statutory duties relevant to our functions in Northern Ireland.

10.2 In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be made public on our website at <http://www.clanmil.org/equalitycomm.php> and sent to the Equality Commission.

# Appendix 1 – Organisation Structure



## Appendix 2: Example groups relevant to the Section 75 categories for Northern Ireland purposes

*Please note, this list is for illustration purposes only, it is not exhaustive.*

Category	Example groups
Religious belief	<p>Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths.</p> <p>For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment &amp; Treatment (NI) Order</i><sup>10</sup>. Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “<i>similar philosophical belief</i>”.</p>
Political opinion <sup>11</sup>	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people.

<sup>10</sup> See Section 98 of the Northern Ireland Act 1998, which states: “*In this Act...*”*political opinion*” and “*religious belief*” shall be construed in accordance with Article 2(3) and (4) of the *Fair Employment & Treatment (NI) Order 1998*.”

<sup>11</sup> Ibid

## Appendix 3 List of consultees

(Schedule 9 4. (2) (a))

### EQUALITY CONSULTATION LIST

A2B (Access to Benefits)
Abbeyfield Society
Action Mental Health
Age NI
Age Sector Platform
Alliance Party for Northern Ireland
Altnagelvin Area Hospitals HSST
Amalgamated Engineering & Electrical Union
Amalgamated Transport & General Workers Union
An Munia Tober
Antrim Borough Council
Ardoyne Community Safety Group
Ards Borough Council
Ards Community Network
Armagh & Dungannon HSST
Armagh District Council
Association of Chief Officers (AVOVO)
Association of Independent Advice Centres
Bahai Council for Northern Ireland
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Baptist Union of Ireland
Barnardos
Beacon Support Services
Belfast City Council
Belfast Central Mission
Belfast Health & Social Services Trust
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Trade Unions Council
Belfast Travellers Education & Development Group
Blind Centre for NI

British Deaf Association (NI)
Carafriend
Carers Northern Ireland
Carrickfergus Borough Council
Castlereagh Borough Council
Causeway HSST
Central Services Agency
Charles Shiels Charity
Chartered Institute of Housing
Child Poverty Action Group (NI)
Children's Law Centre
Chinese Welfare Association
Chief Officers Third Sector (CO3)
Citizens Advice Regional Office (Belfast)
Coalition on Sexual Orientation (CoSO)
Coleraine Borough Council
Colin Neighbourhood Partnership
Committee on the Administration of Justice (CAJ)
Community Development & Health Network (NI)
Community Relations Council (CRC)
Community Restorative Justice Northern Ireland
Community Relations/Training Learning Consortium
Cookstown District Council
Council for the Homeless (NI)
Craigavon & Banbridge Community HSST
Craigavon Area Hospital Group HSST
Craigavon Borough Council
Debt Action NI
Democratic Unionist Party
Department for Social Development
Derry City Council
Derry Well Woman
Disability Action, Belfast
Disability Action, Derry
Down District Council
Down Lisburn HSST
Down's Syndrome Association

Dungannon District Council
East Belfast Community Development Agency

Eastern Health & Social Services Board
Employers' Forum on Disability
Engage with Age
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh District Council
Fermanagh Women's Network
First Key
Foyle Friend
Foyle Haven
Foyle HSST
Free Presbyterian Church of Ulster
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Greater Whitewell Community Group
Green Park Healthcare HSST
Groundworks Northern Ireland
Haig Homes
Harmony Homes NI
Hazelwood Residents Association
Help the Aged Northern Ireland
Homefirst Community HSST
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Larne Borough Council
Lesbian Line
Lighthouse
Ligoniel Improvement Group
Limavady District Council
Link Community Association
Lisburn Borough Council
LORAG (Lower Ormeau Residents Action Group)

Lower Ormeau Community Group
Magherafelt District Council
Magheraflet Women's Group

Mater Infirmorum Hospital Trust
MENCAP
Methodist Church in Ireland
Mind Yourself
Mountcollyer Residents Association
Moyle District Council
Multi-Cultural Resource Centre
Newry & Mourne District Council
Newry & Mourne HSST
Newtownabbey Borough Council
Newtownards Borough Council
NIACRO
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
NITAP
North & West Belfast HSST
North Down Borough Council
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Services Board
Northern Ireland African Cultural Centre
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health
Northern Ireland Association of Citizens Advice Bureaux
Northern Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Northern Ireland Committee for Refugees & Asylum Seekers (NICRAS)
Northern Ireland Committee, Irish Congress of Trade Unions (NICICTU)
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Filipino Association
Northern Ireland Gay Rights Association (NIGRA)
Northern Ireland Housing Council

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Northern Ireland Housing Executive
Northern Ireland Human Rights Commission (NIHRC)
Northern Ireland Mixed Marriage Association
Northern Ireland Office

1<sup>st</sup> August 2012

Northern Ireland Statistics & Research Agency (NISRA)
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
PIPS
PHAB Northern Ireland
Playboard NI
POBAL
Polish Welfare Association
PRAXIS Care
Press for Change
Probation Board for Northern Ireland
Progressive Unionist Party
Queer Space
Registration and Inspection Units – Health Trusts
Royal Institute of British Architects (RIBA)
Royal Institute of Chartered Surveyors (RICS)
Royal Group of Hospitals & Dental Hospital HSST
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
Sense NI
SEEDS
Shelter NI
Sikh Cultural Centre
Simon Community
Sinn Fein
Social Democratic & Labour Party
Southern Health & Social Services Trust

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Sperrin Lakeland Health & Social Care Trust
Staff Commission for Education & Library Boards
STEP, Dungannon
St.Patrick's and St Joesph's Housing Committee
Strabane District Council

1<sup>st</sup> August 2012



**Appendix 4 Timetable for measures proposed**  
(Schedule 9 4.(3) (b))

*The following table lists some examples for illustration purposes*

<b>Measure</b> (example)	<b>Lead responsibility</b> (example)	<b>Timetable</b> (example)
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1<sup>st</sup> August 2012

<i>Have in place appropriate structures and reporting mechanisms</i>	<i>Chief Executive / Management Team</i>	<i>Ongoing</i>
<i>Ensure S75 duties are mainstreamed within the Association in business plans, operational plans &amp; strategic plan</i>	<i>Chief Executive/Management Team</i>	<i>Ongoing / Annual</i>
<i>Employees job descriptions and appraisals reflect S75 duties</i>	<i>Director of Corporate Services</i>	<i>Already in job descriptions Introduced to appraisals Sept 2012</i>
<i>Prepare Model Equality Scheme and issue for consultation</i>	<i>Director of Corporate Services</i>	<i>April 2012</i>
<i>Action plan</i>		
<i>Consultation on draft model scheme and action plan</i>	<i>Director of Corporate Services</i>	<i>April 2012 – June 2012</i>
<i>Finalised action plan published and issued to Equality Commission</i>	<i>Director of Corporate Services</i>	<i>August 2012</i>
<i>Arrangements for monitoring progress in place</i>	<i>Director of Corporate Services</i>	<i>August 2012</i>
<i>Consultation list reviewed and updated</i>	<i>Director of Corporate Services</i>	<i>September Annually</i>
<i>Screening timetable</i>	<i>Senior Management Team</i>	<i>September Annually</i>
<i>Screening Reports</i>	<i>Senior Management Team</i>	<i>Quarterly</i>

<i>EQIA timetable</i>	<i>Senior Management Team</i>	<i>Annually</i>
<i>Monitoring</i>	<i>Director of Corporate Services &amp; Director of Housing</i>	<i>July 2012</i>
<i>Training</i>		
<i>Development of</i>	<i>Director of Corporate Services</i>	<i>September 2012</i>

<i>summary scheme</i>		
<i>Development of overall training programme</i>	<i>Director of Corporate Services</i>	<i>May 2012 &amp; Annually</i>
<i>Focussed training Update training Evaluation of training</i>	<i>Director of Corporate Services</i>	<i>Annually</i>
<i>Provide full access to the scheme for all staff</i>	<i>Director of Corporate Services</i>	<i>May 2012</i>
<i>Assessing access to information and services and ensuring information we disseminate on services provided are fully accessible</i>	<i>Directors of relevant service areas</i>	<i>Quarterly &amp; Annually</i>
<i>Communication of equality scheme</i>	<i>Director of Corporate Services</i>	<i>September 2012</i>
<i>Notification of consultees</i>	<i>Director of Corporate Services / NIFHA</i>	<i>April 2012 and ongoing</i>
<i>Review of equality scheme and production Annual Report - Scheme will be reviewed within 5 years in line with ECNI recommendations</i>	<i>Director of Corporate Services</i>	<i>August Annually</i>
<i>Complaints Review</i>	<i>Director of Corporate Services</i>	<i>Quarterly</i>

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<i>Continue to establish links with other public authorities and interest groups in relation to exchanging learning and best</i>	<i>Management Team</i>	<i>Ongoing</i>
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1<sup>st</sup> August 2012

<i>practice</i>		
<i>Liaise with ECNI to ensure progress of the scheme</i>	<i>Director of Corporate Services</i>	<i>Annually</i>

## **Appendix 5 Glossary of terms**

### **Action plan**

A plan which sets out actions a public authority will take to implement its Section 75 statutory duties. It is a mechanism for the realisation of measures to achieve equality outcomes for the Section 75 equality and good relations categories.

### **Action measures and outcomes**

Specific measures to promote equality and good relations for the relevant Section 75 and good relations categories, linked to achievable outcomes, which should be realistic and timely.

### **Adverse impact**

Where a Section 75 category has been affected differently by a policy and the effect is less favourable, it is known as adverse impact. If a policy has an adverse impact on a Section 75 category, a public authority must consider whether or not the adverse impact is unlawfully discriminatory. In either case a public authority must take measures to redress the adverse impact, by considering mitigating measures and/or alternative ways of delivering the policy.

### **Affirmative action**

In general terms, affirmative action can be defined as being anything consistent with the legislation which is necessary to bring about positive change. It is a phrase used in the Fair Employment and Treatment Order (NI) 1998 to describe lawful action that is aimed at promoting equality of opportunity and fair participation in employment between members of the Protestant and Roman Catholic communities in Northern Ireland.

### **Article 55 Review**

Under the Fair Employment and Treatment (NI) Order 1998, all registered employers must conduct periodic reviews of the composition of their workforces and of their employment practices for the purposes of determining whether members of the Protestant and Roman Catholic communities are enjoying, and are likely to continue to enjoy, fair participation in employment in each employer's concern.

These reviews, which are commonly known as Article 55 Reviews, must be conducted at least once every three years.

### **Audit of inequalities**

An audit of inequalities is a systematic review and analysis of inequalities which exist for service users and those affected by a public authority's policies. An audit can be used by a public authority to inform its work in relation to the Section 75 equality and good relations duties. It can also enable public authorities to assess progress on the implementation of the Section 75 statutory duties, as it provides baseline information on existing inequalities relevant to a public authority's functions. The Audit of Inequalities is a live document and may be subject to review if consultations change, new evidence is gathered or new services are provided.

### **Consultation**

In the context of Section 75, consultation is the process of asking those affected by a policy (ie, service users, staff, the general public) for their views on how the policy could be implemented more effectively to promote equality of opportunity across the 9 categories. Different circumstances will call for different types of consultation. Consultations could, for example, include meetings, focus groups, surveys and questionnaires.

### **Council of Europe**

The Council of Europe, based in Strasbourg, covers virtually the entire European continent, with its 47 member countries. Founded on 5 May 1949 by 10 countries, the Council of Europe seeks to develop throughout Europe common and democratic principles based on the European Convention on Human Rights and other reference texts on the protection of individuals.

### **Desk audit**

An audit of a draft equality scheme to ensure that the scheme conforms with the requirements on form and content as detailed in the Commission's Guidelines (the Guide).

### **Differential impact**

Differential impact occurs where a Section 75 group has been affected differently by a policy. This effect could either be positive, neutral or

negative. A public authority must make a judgement as to whether a policy has a differential impact and then it must determine whether the impact is adverse, based on a systematic appraisal of the accumulated information.

## **Discrimination**

The anti-discrimination laws prohibit the following forms of discrimination:

- Direct discrimination
- Indirect Discrimination
- Disability Discrimination
- Victimisation
- Harassment

Brief descriptions of these above terms follow:

### Direct discrimination

This generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, on one or more of the statutory non-discrimination grounds. A decision or action that is directly discriminatory will normally be unlawful unless: (a) in an age discrimination case, the decision can be objectively justified, or (b) in any other case, the public authority can rely on a statutory exception that permits it – such as a *genuine occupational requirement exception*; or, a *positive action exception* which permits an employer to use “welcoming statements” or to take other lawful positive action to encourage participation by under-represented or otherwise disadvantaged groups.

### Indirect discrimination

The definition of this term varies across some of the anti-discrimination laws, but indirect discrimination generally occurs where a public authority applies to all persons a particular provision, criterion or practice, but which is one that has the effect of placing people who share a particular equality characteristic (e.g. the same sex, or religious belief, or race) at a particular disadvantage compared to other people. A provision, criterion or practice that is indirectly discriminatory will normally be unlawful unless (a) it can be objectively justified, or (b) the public authority can rely on a statutory exception that permits it.

## Disability discrimination

In addition to direct discrimination and victimisation and harassment, discrimination against disabled people may also occur in two other ways: namely, (a) *disability-related discrimination*, and

(b) *failure to comply with a duty to make reasonable adjustments*.

- (a) *Disability-related discrimination* generally occurs where a public authority, without lawful justification, and for a reason which relates to a disabled person's disability, treats that person less favourably than it treats (or, would treat) other people to whom that reason does not (or, would not) apply.
- (b) *Failure to comply with a duty to make reasonable adjustments*: One of the most notable features of the disability discrimination legislation is that in prescribed circumstances it imposes a duty on employers, service providers and public authorities to take such steps as are reasonable to remove or reduce particular disadvantages experienced by disabled people in those circumstances.

## Victimisation

This form of discrimination generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, because the person has previously exercised his/her rights under the anti-discrimination laws, or has assisted another person to do so. Victimisation cannot be justified and is always unlawful.

## Harassment

Harassment generally occurs where a person is subjected to unwanted conduct that is related to a non-discrimination ground with the purpose, or which has the effect, of violating their dignity or of creating for them an intimidating, hostile, degrading, humiliating or offensive environment. Harassment cannot be justified and is always unlawful.

## **Economic appraisal**

An economic appraisal is a systematic process for examining alternative uses of resources, focusing on assessment of needs, objectives, options, costs benefits, risks, funding and affordability and other factors relevant to decisions.

## **Equality impact assessment**

The mechanism underpinning Section 75, where existing and proposed policies are assessed in order to determine whether they have an adverse impact on equality of opportunity for the relevant Section 75 categories. Equality impact assessments require the analysis of both quantitative and qualitative data.

## **Equality of opportunity**

The prevention, elimination or regulation of discrimination between people on grounds of characteristics including sex, marital status, age, disability, religious belief, political opinion, dependants, race and sexual orientation.

The promotion of equality of opportunity entails more than the elimination of discrimination. It requires proactive measures to be taken to secure equality of opportunity between the categories identified under Section 75.

## **Equality scheme**

A document which outlines a public authority's arrangements for complying with its Section 75 obligations. An equality scheme must include an outline of the public authority's arrangements for carrying out consultations, screening, equality impact assessments, monitoring, training and arrangements for ensuring access to information and services.

## **Good relations**

Although not defined in the legislation, the Commission has agreed the following working definition of good relations: 'the growth of relations and structures for Northern Ireland that acknowledge the religious, political and racial context of this society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms'.

## **Mainstreaming equality**

The integration of equal opportunities principles, strategies and practices into the every day work of public authorities from the outset. In other words, mainstreaming is the process of ensuring that equality considerations are built into the policy development process from the beginning, rather than being bolted on at the end. Mainstreaming can help improve methods of working by increasing a public authority's accountability, responsiveness to need and relations with the public. It can bring added value at many levels.

## **Mitigation of adverse impact**

Where an equality impact assessment reveals that a particular policy has an adverse impact on equality of opportunity, a public authority must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories; this is known as mitigating adverse impact.

## **Monitoring**

Monitoring consists of continuously scrutinising and evaluating a policy to assess its impact on the Section 75 categories. Monitoring must be sensitive to the issues associated with human rights and privacy. Public authorities should seek advice from consultees and Section 75 representative groups when setting up monitoring systems.

Monitoring consists of the collection of relevant information and evaluation of policies. It is not solely about the collection of data, it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy screening.

## **Northern Ireland Act**

The Northern Ireland Act, implementing the Good Friday Agreement, received Royal Assent on 19 November 1998. Section 75 of the Act created the statutory equality duties.

## **Northern Ireland Human Rights Commission**

A statutory body established under Section 68 of the Northern Ireland Act 1998, which works to ensure that the human rights of everyone in Northern Ireland are fully protected in law, policy and practice.

## **Northern Ireland Statistics & Research Agency (NISRA)**

The Northern Ireland Statistics and Research Agency (NISRA) is an Executive Agency within the Department of Finance and Personnel (DFP).

They provide statistical and research information regarding Northern Ireland issues and provide registration services to the public in the most effective and efficient way.

## **OFMdfM**

The Office of the First Minister and Deputy First Minister is responsible for providing advice, guidance, challenge and support to other NI Civil Service Departments on Section 75 issues.

## **PAFT**

The Policy Appraisal and Fair Treatment (PAFT) Guidelines constituted the first non-statutory attempt at mainstreaming equality in Northern Ireland in January 1994. The aim of the PAFT Guidelines was to ensure that issues of equality and equity informed policy making and activity in all spheres and at all levels of government. PAFT has now been superseded by Section 75 of the Northern Ireland Act 1998.

## **Policy**

The formal and informal decisions a public authority makes in relation to carrying out its duties. Defined in the New Oxford English Dictionary as 'a course or principle of action adopted or proposed by a government party, business or individual'. In the context of Section 75, the term **policies** covers all the ways in which a public authority carries out or proposes to carry out its functions relating to Northern Ireland. Policies include unwritten as well as written policies.

## **Positive action**

This phrase is not defined in any statute, but the Equality Commission understands it to mean any lawful action that a public authority might take for the purpose of promoting equality of opportunity for all persons in relation to employment or in accessing goods, facilities or services (such as health services, housing, education, justice, policing). It may involve adopting new policies, practices, or procedures; or changing or abandoning old ones. *Positive action* is not the same as *positive discrimination*.

Positive discrimination differs from positive action in that *positive action* involves the taking of lawful actions whereas *positive discrimination* involves the taking of unlawful actions. Consequently, *positive action* is by definition lawful whereas *positive discrimination* is unlawful.

## **Qualitative data**

Qualitative data refers to the experiences of individuals from their perspective, most often with less emphasis on numbers or statistical analysis. Consultations are more likely to yield qualitative than quantitative data.

## **Quantitative data**

Quantitative data refers to numbers, typically derived from either a population in general or samples of that population. This information is often analysed by either using descriptive statistics, which consider general profiles, distributions and trends in the data, or inferential statistics, which are used to determine 'significance' either in relationships or differences in the data.

## **SACHR**

The Standing Advisory Commission on Human Rights (SACHR) has now been replaced by the Northern Ireland Human Rights Commission. SACHR, as part of its review of mechanisms in place to promote employment equality and reduce the unemployment differential, recommended that the PAFT Guidelines should be made a statutory requirement.

## **Screening**

The procedure for identifying which policies will be subject to equality impact assessment, and how these equality impact assessments will be prioritised. The purpose of screening is to identify the policies which are likely to have a minor/major impact on equality of opportunity so that greatest resources can be devoted to improving these policies. Screening requires a systematic review of existing and proposed policies.

## **Schedule 9**

Schedule 9 of the Northern Ireland Act 1998 sets out detailed provisions for the enforcement of the Section 75 statutory duties, including an outline of what should be included in an equality scheme.

## **Section 75**

Section 75 of the Northern Ireland Act provides that each public authority is required, in carrying out its functions relating to Northern Ireland, 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 and sexual orientation;
- men and women generally;

- persons with a disability and persons without; and
- persons with dependants and persons without.

Without prejudice to these obligations, each public authority in carrying out its functions relating to Northern Ireland must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

### **Section 75 investigation**

An investigation carried out by the Equality Commission, under Schedule 9 of the NI Act 1998, arising from the failure of a public authority to comply with the commitments set out in its approved equality scheme.

There are two types of Commission investigation, these are as follows:

1. An investigation of a complaint by an individual who claims to have been directly affected by the failure of a public authority to comply with its approved equality scheme;
2. An investigation initiated by the Commission, where it believes that a public authority may have failed to comply with its approved equality scheme.

## **Appendix 6 Action plan/action measures**

### **Introduction**

In April 2004 the Registered Housing Associations in Northern Ireland came within the jurisdiction of the Commissioner for Complaints by virtue of Article 146 of The Housing (NI) Order 2003. As a result of this Registered Housing Associations were designated as public authorities for the purposes of Section 75 of the Northern Ireland Act 1998.

A housing association is an independent voluntary organisation dedicated to helping people obtain good quality, affordable housing which meets their needs. Although a significant proportion of the work they do assists the government in the delivery of much-needed public services, they are not public bodies. All designated housing associations are members of the Northern Ireland Federation of Housing Associations (NIFHA).

NIFHA is the umbrella body for the voluntary housing movement in Northern Ireland. Its main role is to promote member housing associations and to provide representation and support for those members in the work that they do. NIFHA itself is not a designated body, but has taken on a co-ordination role as part of its support for members. As a result, the Federation assists its members in the implementation of Section 75 through a joint approach to the statutory equality duties.

Throughout the implementation of the equality process the Federation and its members have taken the view that by working jointly we can maximise our resources – in terms of time, knowledge, expertise, staffing or finances – and at the same time minimise the administrative impact on consultee and/or stakeholder organisations. This belief has also underpinned our work during the first phase of equality schemes and was commended by the Equality Commission for Northern Ireland (ECNI) so we took a decision to maintain this collaborative approach for the second phase of equality schemes which commenced in 2010.

However, it should be noted responsibility for discharging the Statutory Equality and Good Relations Duties in the individual organisation **remains** with each designated housing association. NIFHA's role is purely a supportive one.

## **Background**

In 2010 the ECNI published new guidance on the implementation of Section 75<sup>12</sup>. This guidance includes the recommendation that designated bodies:

- “include in their equality scheme a commitment to developing action plans detailing measures to promote equality of opportunity and good relations”.

As part of the process for developing Action Plans the guidance also recommended designated bodies should:

- “undertake an Audit of Inequalities to identify the range of key inequalities which the discharge of the public authority's functions is intended to or is likely to address;
- “develop action measures based on functions and key inequalities”.

The ECNI wrote to all designated housing associations on 1 November 2011 indicating that a formal call for a new Equality Scheme would be issued on 1 February 2012. The Commission also advised that the three month period from November to February would provide an opportunity to undertake the recommended Audit of Inequalities.

## **Audits of Inequalities: What the Commission says**

An audit of inequalities is intended to set the framework for a public authority to address inequalities relevant to their functions. It should enable a public authority to identify potential functional areas for further or better discharge of the Section 75 statutory duties and can therefore inform key strategic actions.

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<sup>12</sup> Section 75 of the Northern Ireland Act 1998, A Guide for Public Authorities, April 2010

The audit of inequalities is “a systematic review and analysis of inequalities which exist for service users and those affected by a public authority’s policies”. It can be used by a public authority to inform its work in relation to the promotion of the Section 75 equality and good relations duties. It can also enable public authorities to assess progress on the implementation of the Section 75 statutory duties, as it should provide baseline information on existing inequalities relevant to a public authority’s functions.

According to the ECNI “an audit of inequalities entails an analysis of information gathered to inform the development of action plans”.

The Commission recognises that this is a developing process and public authorities should focus on priorities and outcomes improving over time. On the basis of this information the designated housing associations have therefore been mindful of the need to focus on measures where they have greatest ability to effect change.

Housing associations are regulated by the Department for Social Development (DSD). They work closely with the DSD and the Northern Ireland Housing Executive (NIHE) to deliver housing and related services. Some also provide care and /or support services so they work with the relevant public authorities for the health sector too. As a result of this situation, housing associations must adhere to a wide range of policies and procedures which have been developed and are owned by a public authority or government department. In such cases associations must operate the policy of another body and have little or no scope to change that policy.

For example, associations are the main delivery vehicle for the Social Housing Development Programme but need is determined by the NIHE and the Department for Social Housing develops the programme which is then managed by the Housing Executive. So whilst housing

associations may bid to deliver part of that programme they have no powers to shape the programme or establish where new social housing should be built. Similarly housing associations allocate their homes to the public but must do so using the NIHE's Housing Selection Scheme and on the basis of the points awarded by the Housing Executive. Moreover, though associations provide a range of housing and care services they cannot determine the level of public funding available for that purpose.

Where appropriate, potential inequalities identified by housing associations which are outside their remit will be highlighted to the relevant public body.

The functions of each designated housing association will be detailed in its respective equality scheme. Taken collectively however, the main responsibilities of housing associations fall broadly into the following areas:

- provision of housing and related services to those in housing need;
- management and maintenance of its own stock; and,
- development of new stock, if appropriate.

As indicated previously even within these categories the housing associations often have to operate policies or adhere to strategies which are within the development and control of other organisations.

### **Overview of Housing Association Operations in Northern Ireland**

Collectively, housing associations provide around 36,000 good quality, affordable homes for renting or equity sharing as well as providing a range of community services. In 2010-11 registered housing associations developed a record number of houses, with 2,418 starts, enabled almost 500 households to part-buy a home and let almost 4,000 high quality affordable homes to people in housing need. Further information about housing associations is available at [www.nifha.org](http://www.nifha.org).

Housing associations vary greatly in size and in the scale of their operations. Some are fairly small organisations which operate in a particular community or to address a specific need whilst others conduct their business across Northern Ireland or in some cases throughout Ireland. The stock size of the individual associations can differ greatly too from large organisations with around 5,000 properties to those that manage fewer than 50 homes. Staff numbers also vary considerably from one association to another but across the sector there are around 2,500 people who work in the voluntary housing movement. Their contribution is complemented by the input of the 400 individuals who serve on housing associations Boards.

Housing associations provide a wide range of services throughout Northern Ireland including the following types of homes and support:

- General family housing
- Older people's accommodation
- Shared housing and houses in multiple occupation
- Shared equity homes
- Supported accommodation for those with specific needs e.g. learning disabilities, addictions, mental health
- Residential care homes
- Day care provision
- Supported employment projects
- Community development activities

### **Collective Work to Date**

In 2010 NIFHA Council agreed the designated housing associations should continue to be supported by the Federation during the development and implementation of the second phase of equality schemes. In 2011 NIFHA established a small task group comprised of representatives of the following housing associations:

- Alpha
- Apex
- Clanmil
- Connswater
- Habinteg
- Helm
- Oaklee
- SHAC
- Trinity

NIFHA's Corporate Services Manager worked with this Equality Task Group to steer and co-ordinate the collaborative elements of member associations' production of new equality schemes, undertaking Audits of Inequality and developing associated Action Plans. In addition, individual members of the group took responsibility for sourcing key information relevant to the equality categories.

Members of the group also contributed to training events and practical workshop sessions held for member associations. These included:

- Workshops to identify potential inequalities by functional area, September 2011 – facilitated by Dorothy McKee
- Developing S75 Actions and revised Equality Schemes: What Social Housing Providers Need to Know, October 2011 – facilitated by ECNI representatives, Tony Steed, NIHE and Lucinda McMurrin, NIFHA
- Challenge Workshop to assess potential impacts by equality category, January 2012 – facilitated by John Kremer

These preparation and planning sessions, which helped inform our collaborative approach, were held over several months to allow time for gathering member feedback. Details of housing association participation in these sessions is shown at Annex A.

The information gathered through this work informed the decisions of the Equality Task Group which agreed that the audit should be based on a combination of the inequalities identified which related certain functions and the inequalities identified according to the nine equality categories. This enabled the incorporation of information about particular groups that

we already know require positive action to address inequalities. The Group also agreed the need to include a cross-category section as some of the potential inequalities identified affected more than one equality grouping.

Material from the Commission's Statement on Key Inequalities in Northern Ireland (October 2007) proved to be a useful starting point when assessing potential inequalities within housing generally. In terms of social housing the main sources of information used in undertaking the audits of inequalities are shown at Annex B.

### **Equality Action Plan**

The following section sets out the actions the housing associations propose to take to address potential inequalities identified. As this is part of an ongoing process to improve equality and good relations outcomes some of the Proposed Actions will relate to measures which were already planned or are currently in place. However, we would stress the actions listed are offered as sector-wide proposals which will need to be refined (including timeframes) following the consultation process. We believe this approach will better enable the final Action Plan of each individual association to be reflective of their business as well as being informed by the feedback received during consultation.

At this stage we consider the proposed measures which are most likely to deliver tangible equality outcomes are:

- A joint project to gather comprehensive tenant profile information
- Review of communications
- Review of governance and Board renewal processes
- Our campaigns of lobbying through NIFHA such as on welfare reform or funding for support services

We would welcome your feedback on these proposals.

Please note, notwithstanding our overall commitment to implementing the statutory duties all of the proposed actions are reliant on sufficient resources being available.

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Corporate Issues</b>					
<b>Tenant Profiling Exercise</b>	All tenants profile on the 9 groups by household to better inform services.	All tenants surveyed	Responses inform more targeted, responsive services.	December 2012	Housing Management Dept / Director of Housing
<b>Stock Profiling Exercise to future proof stock in terms of Asset Management</b>	Greater awareness of Life-time home issues to influence Asset Management Strategy	Properties future proofed to meet changing tenant demands	Homes which meet the needs of tenants	March 2013	Property Services Dept / Director of Property Services
<b>Communication and Understanding difficulties particularly with those with a learning disability or sensory impairment etc</b>	To ensure all relevant information is provided in an accessible format and those with low literacy levels	Develop standard Easy read tenancy information Easy read library on the website.	Improved access and uptake of services	Policy drafted May 2012  Easy read library established by December 2012	Housing Management / Corporate Services Depts / Director of Housing & Director of Corporate Services
<b>Need for an integrated management system for data capture</b>	To implement a housing management package which is fully integrated	To provide a more accurate picture of service users and to provide accurate information to prove, expand and develop services	Identify gaps in current service provision and gap model services accordingly	2012-December 2013	IT Dept / Director of Technology

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Corporate Issues</b>					
<b>Issues re consistency of external contracts compliance with equality duties</b>	<p>Ensure external contractual literature includes a clause to ensure compliance with equality law and practice</p> <p>Future contractual literature includes equality clauses</p> <p>Review and agree action plan if necessary Easy to read procurement guide</p> <p>Review ECNI guidance Equality of Opportunity and sustainable development in public sector procurement</p>	Improved compliance by external contractors regarding Section 75 provisions	Improved awareness of procurement issues	<p>Review by December 2012 and ongoing</p> <p>March 2013</p>	<p>Property Services Dept / Director of Property Services</p> <p>Property Services &amp; Corporate Services Depts. / Director of Property Services / Director of Corporate Services</p>
<b>Caring across all groups in society. Despite this diversity carers want the same thing – sensitive tailored support designed with their personal and work life needs circumstances and their beliefs in mind</b>	To meet with Carers NI in relation to ways to assist	Review of work-life balance policies and tenancy support services	The development of specialist support and information	May 2013	Housing Management & Corporate Services Depts / Director of Housing / Director of Corporate Services

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Employment Issues</b>					
<b>Potential inequitable treatment of staff at the upper end of the age profile</b>	Ensure and equitable treatment for staff irrespective of age	Fair retirement policy  Mentoring guide for staff	Increased monitoring of employment opportunities for staff at the upper end of the age profile to extend their working life or retire	December 2012	Corporate Services Dept. / Director of Corporate Services
<b>Under representation of people with disabilities employed</b>	Implement a staff survey for staff with disabilities to identify issues they face to inform policy  Consider work-placements for those with disabilities through advocacy services	More detailed monitoring of the impact of disability on staff	Creates a culture that empowers and supports employees with disabilities in the workplace	December 2012	Corporate Services Dept. / Director of Corporate Services
<b>Review potential equality issues identified in the Article 55 Review</b>	Completion of Article 55 review in line with FETO 1998	Achievement of any positive action measures identified and agreed	Both main communities within Northern Ireland are fairly represented in the workplace	Ongoing monitoring over 3 year period	Corporate Services Dept. / Director of Corporate Services

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Employment Issues</b>					
<b>Refine data capture in all employment categories across the 9 groups</b>	Completion and analysis of equality monitoring and expand detail Audit of workforce learning and development policy Continue to review monitoring arrangements for training attendance	Increased awareness of attendance across all occupational groups	Increased awareness and understanding of equality and diversity issues for staff	Ongoing over a 3 year period	Corporate Services Dept. / Director of Corporate Services
<b>Barriers to employment from marginalised groups</b>	Removing barriers to employment and improving access to the long-term unemployed and other marginalised groups Review key ECNI research documents in employment and inequalities in the economic downturn	Draft policy as appendix to recruitment and selection manual	Improved opportunities for identified groups	Over 3 year period	Corporate Services Dept / Director of Corporate Services
<b>Need for greater awareness amongst Clanmil Housing Staff of Section 75 issues</b>	Continue to mainstream Section 75 equality good relations into core business  Redesign Clanmil Housing screening template to reflect the ECNI new guidelines	All staff to receive briefing and general awareness training  Produce quarterly screening reports	Increased awareness and understanding amongst staff of Section 75 duties Equality duties further mainstreamed into strategic and operational plans and decision making	Life of 3 year strategic plan	Corporate Services Dept. / Director of Corporate Services

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact		
<b>Corporate Issues</b>					
	Composition of Housing Association Boards to best reflect the 9 categories	Gather more comprehensive baseline information Review governance processes and composition of Board by April 2013 Make use of NIFHA Board Member Register as appropriate during Board renewal Revised Standing Orders issued	Board representative of tenant base  New standing orders for Board members	December 2012  September 2012	Chief Executive
	Impact of Anti-social behaviour (ASB) policies may be greater for certain groups e.g. young males	Monitor cases of ASB to identify trends – in particular where they may affect a specific group such as young men or people from a different racial group Review of Anti Social Behaviour Policy	Assessment of monitoring information and look at targeted services	September and ongoing	Housing Management Dept. / Director of Housing
	Accessibility of information and services has the potential to vary the different equality categories – whilst this has been subject to EQIA it continues to merit ongoing consideration	Gather more comprehensive tenant profile information during 2012-13 to help tailor services to customer needs. Continue to review and monitor association approach to provision of information and services. Use information from previous EQIA and subsequent monitoring to inform the introduction of improvements		March 2013	Housing Management Dept. / Director of Housing

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact		
<b>Corporate Issues</b>					
<b>Need to further mainstream Section 75 considerations into strategic and business planning cycles</b>	To ensure that Section 75 is fully integrated into the business planning processes	Evidence of Section 75 related actions linked to targets to reduce inequality	Increased mainstreaming of Section 75 duties	Annual	Corporate Services Dept. / Director of Corporate Services

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve?  Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact		
<b>Equality Issues</b>					
<b>Age</b>	Few play spaces for young people / children	<p>Liaise with appropriate local authority to encourage the inclusion of play areas in new developments</p> <p>Gather more comprehensive tenant profile information during 2012-13 to clarify the potential impact</p> <p>Work with representative groups to look at play space</p> <p>Actively engage with PlayBoard NI in the Reclaim Your Streets project</p>	<p>Policy on play for younger children.</p> <p>Introduce innovative play solutions where appropriate.</p>	<p>December 2012</p> <p>Ongoing</p>	Housing Management Dept. / Director of Housing
	<p>Electronic forms of communication can cause problems for older people</p> <p>Digital divide as older people may not be able to use / access services which are available electronically for example through internet</p>	<p>Undertake review of preferred methods of communication for tenants</p> <p>Continue to facilitate training on electronic communications where appropriate – e.g. silver surfers sessions in sheltered housing schemes</p> <p>Explore the use of broad band on new developments</p> <p>Review digital forms of communication used by association to ensure maximum inclusivity.</p>	<p>Tenant profiling identifying preferred communication.</p> <p>Scheme computers</p> <p>Take part in and promote computer engagement as active learning.</p>	<p>December 2012</p> <p>Ongoing</p> <p>Annually</p>	Housing Management Dept. / Director of Housing

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact		
<b>Equality Issues</b>					
<b>Age</b>	Growing older population but accommodation to meet not increasing therefore there is potentially less choice for older people	Monitor demand for housing for older people at association level – overall need determined by NIHE Continue to highlight need to the Department for Social Development, Northern Ireland Housing Executive and Planning departments.	Involvement in Older Peoples Strategy across statutory agencies highlighting need	March 2013	Housing Management Dept. / Director of Housing
	Social inclusion of older people	Gather information to inform the development of suitable activities Liaise with relevant authorities as necessary  Needs Assessment of current activities  Review of the Clanmil Older Peoples Strategy	Activities designed to improve inclusion of Clanmil tenants.	April 2012 – March 2013	Housing Management Dept. / Director of Housing
	Welfare reform	Continue to lobby government on the impact of Welfare Reform Monitor situation as Welfare Reform changes are introduced to determine impacts on tenants, in particular those between 25 and 35 who may be affected by the Shared Room Rate Tenant profiling to assess impact	Better understanding of impact on Clanmil tenants.  Keep under review lettibility issues as tenants are affected.	April 2012 – March 2013  March 2013 and ongoing	Housing Management Dept. / Director of Housing  Property Services & Housing Management Depts. / Director of Property Services / Director of Housing

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
<b>Engagement with Youth – younger people tend to be overlooked in engagement with services</b>	To attempt to establish a youth forum and create a policy for youth engagement and to meet with Children's Commissioner to look at engaging with youth	Youth Forum established and youth section on website	More effective engagement with young people in our schemes	December 2012	Housing Management Dept / Director of Housing
<b>Dependents</b>	Welfare Reform – single room rate will have adverse impact on single parents under 35; especially males	Continue to lobby government on the impact of Welfare Reform Monitor situation as Welfare Reform changes are introduced to determine impacts on tenants, in particular those between 25 and 35 who may be affected by the Shared Room Rate	Attempt to reduce financial impact on Clanmil tenants	March 2013 and ongoing	Housing Management Dept / Director of Housing
	Lack of play space for children	Liaise with local authority to encourage the inclusion of play areas in new developments Gather more comprehensive tenant profile information during 2012-13 to clarify potential impact	See under Age Section		

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
	Lack of 2 bed accommodation for: Single parents Elderly/disabled people needing carers	Monitor demand – highlight issue to Department for Social Development and Northern Ireland Housing Executive as appropriate	More tailored accommodation	April 2012 and ongoing	Housing Management Dept. / Director of Housing
<b>Disability</b>	Lack of suitable (Lifetime homes) accommodation highlighted in ECNI statement of Key Inequalities	All new social housing is built to Lifetime Homes standard Continue work with NIHE in development of comprehensive property database to enable better matching of stock to individual need.	More tailored housing	December 2012 and ongoing	Property Services Dept. / Director of Property Services
	Communications which do not meet differing needs of service users	Undertake review of forms of communication used by association to ensure maximum inclusivity Gather more comprehensive tenant profile information during 2012-13 to improve identification of preferred methods of communication	Tenant profiling targeting more effective communication	May 2012 and ongoing	Housing Management Dept / Director of Housing
	Electronic communications / digital divide	Undertake review of digital forms of communication used by association to ensure maximum inclusivity Engagement with representative groups to form policy.	New policy formed	April 2013	Housing Management & IT Depts. / Director of Housing / Director of Technology
	People with mental ill-health may experience difficulty in assessing services and in relation to employment	Continue to ensure compliance with legislation and keep abreast of best practice Engage with representative groups identify/mitigate potential barriers			

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
<b>Disability</b>	Funding for adaptations is only available once which may cause difficulties if needs change	Gather baseline information to clarify the number of times where this situation arises in 2012-13 Lobby DSD on this issue Explore options for alternative funding Through NIFHA maintain involvement in and raise relevant issues with Joint Housing Adaptations Group	Plan for adaptations that meet the needs of the tenant at that time	March 2013	Property Services Dept / Director of Property Services
	People with a learning disability may have to remain in long stay hospitals due to lack of suitable services	Continue to liaise with relevant authorities as necessary Gather baseline information to clarify the number of instances where association is not in position to assist	Use of specialist agencies to deliver support needs for tenants	Ongoing	Housing Management Dept. / Director of Housing
<b>Gender</b>	Activities at (sheltered) schemes can be geared towards one gender only	Gather more comprehensive tenant profile information during 2012-13 to improve development of customer services Gather baseline information on uptake of activities, if relevant	Inclusive activities promotion	September 2012 and ongoing	Housing Management Dept. / Director of Housing

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
		Use tenant feedback to inform the development of activities in sheltered housing schemes Cross-sectoral sharing of case studies / good practice			
	Gender imbalances in staff at all levels across the sector	Gather more comprehensive cross-sectoral data during 2012-13 to clarify actual situation. Consider options for mitigation of impacts identified During 2013-14 develop strategy based on research Positive welcoming statements where appropriate	Annual monitoring return  Demonstrate attempts to increase imbalance where identified	September 2012 and ongoing	Corporate Services Dept. / Director of Corporate Services
<b>Marital Status</b>	Couples in residential homes not always housed together	Record all instances during 2012-13 to inform action Highlight problem to relevant authorities Identify options for mitigating impact which are available to housing associations	Statistics to identify if there is an issue	September 2012	Housing Management Dept. / Director of Housing

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
<b>Political Opinion</b>	Possible inequalities due to perceptions of potential employees who have 'political convictions'.	Explore adoption of new guidelines from OFM/DFM on employment of individuals with conflict related convictions	New policy created	December 2012	Corporate Services Dept. / Director of Corporate Services
<b>Race</b>	Communications and accessibility may be difficult for those whose first language is not English or who are unfamiliar with system	Gather more comprehensive tenant profile information during 2012-13 to help tailor services to customer needs Undertake review of preferred methods of communication for tenants Continue to use translation and interpretation services as appropriate Liaise with relevant stakeholder bodies to identify best practice Cross-sectoral sharing of case studies / good practice Refresh training and policy on Language Line	Communication more effective	September 2012 and ongoing	Corporate Services Dept. / Director of Corporate Services
	Electronic communications / digital divide	Review digital forms of communication used by association to ensure maximum inclusivity			

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	Lack of adequate housing and accommodation for Travellers	Through the Social Housing Development Programme work with NIHE to deliver housing schemes which meet the needs of Travellers	More homes created for travellers across the movement	Ongoing	Housing Management Dept. / Director of Housing
	Information for Travellers not always clear due to low levels of literacy.	Improve awareness and flexibility for travellers to access services  Communication Policy statement developed with particular emphasis on communicating tenancy issues i.e. rent increase etc	More responsive service. Less reticence to avail of services.	September 2012	Housing Management Dept. / Director of Housing
	People from Black and Minority Ethnic communities are vulnerable to exploitation and discrimination in housing	Develop improved cross-sectoral liaison with representatives of relevant stakeholder groups Establish liaison with specific stakeholder groups as required Positive welcoming statements Good Neighbour Charters	Policies screened to ensure inclusiveness and responsiveness	September 2012 and ongoing	Housing Management & Corporate Services Depts. / Director of Housing / Director of Corporate Services
<b>Religion</b>	People of one community taking longer to get housed than another	This situation is outside of the control of housing associations as offers are based on tenant preference and points allocated			

Key Inequalities Identified and Sourced	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
		Where practical take action to minimise potential chill factors – for example develop / implement strategies relating to flags, emblems and/or sectional symbols Training programmes as appropriate	Monitor development activity in line with NIHE statistical monitoring	April 2012 and ongoing	Housing Management & Property Services Depts. / Director of Housing / Director of Property Services
	Lack of 'shared neighbourhoods'	Continue development of Shared Future housing schemes as opportunities arise Maintain use of Good Neighbour Agreements for all housing stock Develop introduction of shared neighbourhood schemes as suitable Positively endorse the principles of Shared Future Housing	More increased shared neighbourhoods	Ongoing	Housing Management Dept. / Director of Housing

Key Inequalities Identified and Source	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
<b>Sexual Orientation</b>	Attitudes to those of differing sexual orientation	Further develop programmes of training Work with staff to identify potential chill factors Cross-sectoral sharing of case studies / good practice	Awareness session with staff and targeted awareness with housing staff	December 2012	Corporate Services Dept. / Director of Corporate Services
	Access to services	Training and better links with LGBT community Explore use of Advocacy service	Use of services as required to resolve issues effectively	September 2012 and ongoing	Corporate Services Dept. / Director of Corporate Services

## Additional Points Raised by Consultee Groups and Clanmil commentary

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
<b>Mencap</b>	Need to consider resettlement issues after a person has had a long stay in hospital	Statutory responsibility for resettlement and move on strategy sits with the Health Trusts.			Housing Management Dept. / Director of Housing
	Disability Awareness Training specifically around mental health awareness	Need to consider who delivers the training – Corporate Services to review and identify suitable trainer	Increased tailored approach to individual issues	September 2012	Corporate Services Dept. / Director of Corporate Services
	Documents should be made easy read – specifically the Tenancy Agreement	Review current documents and consider approaching Consultee Group for comments – led by housing management	Easy Read tenancy agreement to be drafted.	September 2012	Housing Management Dept. / Director of Housing
<b>CAJ</b>	Need to ensure screening document is placed on the website and consider emailing those on the Consultee List to make them aware that it is there and they can get in touch directly with comments	Screening documentation to be placed on the website and emails sent to those on Consultee List to make them aware	Awareness of policies recently screened	Ongoing – quarterly	Corporate Services Dept. / Director of Corporate Services

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	Helpful to designate and make a difference between Good Relations & Equality of Opportunity	Screening forms will have separate sections for both duties	Equality and Good Relations included.	August 2012	Corporate Services Dept. / Director of Corporate Services
<b>NICEM</b>	Housing Management Forum – traveller accommodation should be an agenda item	To be considered for inclusion as an Agenda Item by Housing Management department	To share best practice.	December 2012	Housing Management Dept. / Director of Housing
	Tenant base – emphasis on tenant profile and reference accessible language and translation services.	Database to be set up to include tenant profile – transitional arrangements to be considered	To enable staff to know their tenants and tailor services provision	December 2012	Housing Management & IT Depts. / Director of Housing / Director of Technology
	Racial Harassment – people are unaware of the areas that are covered under racial harassment and the specific procedures to be followed	Review Anti Social behaviour policy in Housing Management to include specific processes.	Reference and review of policy and instruction for housing staff	September 2012	Housing Management Dept. / Director of Housing

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
<b>Chinese Welfare Association</b>	Difficulties with cultural and language barriers	Review of Communications Policy for tenants. Remind staff of Language Line.	Communications Policy tailored to section 75 groups	December 2012	Housing Management Dept. / Director of Housing
	Aware of a “chill factor” re housing assessment and the Governments apprehension – specific to the Chinese community	Awareness raising for staff through training event	Contact to establish awareness for staff	January 2013	Corporate Services Dept. / Director of Corporate Services
	Language Line – needs to be more usable by staff for interpretation purposes. Need to set up a referral policy.	Need to remind staff of the policy and set up training if required.	Policy refresher sent out to all staff	September 2012	Corporate Services Dept. / Director of Corporate Services
<b>Rainbow</b>	Advocacy services – advocating inclusion in harassment / hate crimes policy.	Housing Management to review how to capture the information in policy for tenants.	Policy revised and communicated	September 2012	Housing Management Dept. / Director of Housing Management
	Need to consider when and how to monitor staff in terms of how welcoming the organisation is to LBGT groups	Surveys to be drawn up and comments to be taken into consideration	Action plan from results of surveys – gaps in data currently	March 2013	Corporate Services Dept./ Director of Corporate Services

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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	HR Forum – need to consider including Rainbow to agree how to monitor information	To be discussed at HR Forum	Invite to talk at HR Forum	September 2012	Corporate Services Dept. / Director of Corporate Services
<b>Action for Children</b>	<p>Clanmil Housing Equality Scheme document is very comprehensive with some excellent clearly communicated analysis and clear action planning.</p> <p>Audit of Inequalities and Action Plan is the most important part of the document and references children and young people a great deal with is good to see as often with schemes “age” is interpreted as being about older people only.</p>				

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
<b>Equality Commission for Northern Ireland</b>	The Commission recommends that paragraph 4.13 includes the commitment set out in the Model Equality Scheme i.e. "As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on our website".	Accepted and included in the Clanmil Housing Equality Scheme.			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	Commission recommends that section 4.25 of the scheme incorporates the wording used at paragraph 4.25 “In addition to the above, screening reports (electronic link or hard copy on request if more suitable for recipients) which include all policies over a 3 month period are also sent directly to all consultees on a quarterly basis”	Accepted and Included in the Clanmil Housing Equality Scheme			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	The Commission recommends that Appendix 4 also includes a measure 'to implement/deliver an action plan'.	Accepted and Included in the Clanmil Housing Equality Scheme			
	The Commission recommends that the reference to 'annually' in appendix 4 is amended to quarterly as stated in Chapter 4 of the scheme.	Accepted and Included in the Clanmil Housing Equality Scheme			
	The Commission recommends that Associations explicitly state that it will 'seek the views of those directly affected by the matter/policy, the Equality Commission, representative groups, other public authorities, voluntary and community groups, staff	Accepted and Included in the Clanmil Housing Equality Scheme			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	and trade unions and other groups who have a legitimate interest in the matter whether or not they have a direct economic or personal interest'. Such a statement sends a clear message to everyone reading the scheme that the Association is committed to inclusive consultation.				
	The Commission recommend that you include the equality scheme in a generic commitment to take account of existing and developing good practice in relation to consultation, similar to the commitment contained in your scheme at para 6.5	Accepted and Included in the Clanmil Housing Equality Scheme			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	The Commission recommends that examples are given when the consultation period be extended and that a commitment is included to ensure that consultees who have special requirements, like provision of information in alternative formats, have equal time to respond.	Accepted and Included in the Clanmil Housing Equality Scheme			
	The Commission recommends that the consultation list is made available as a standalone document on your website as this makes the information, as well as the concept of consultation, more readily accessible to everyone, including those who may not be	Accepted and Included in the Clanmil Housing Equality Scheme			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	familiar with equality schemes and the associated processes.				
	The Commission recommends action plans are made available in alternative formats and that the equality scheme includes details of where this can be obtained.	Accepted and Included in the Clanmil Housing Equality Scheme			
	The Commission recommends that a specific timeline is included in the scheme for providing information in alternative formats, both in relation to the scheme at para 3.2.3 – consultation and at para 6.6 – general information.	Accepted and Included in the Clanmil Housing Equality Scheme			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	The Commission recommends that screening templates are readily available without prompting, for example by publishing them on your website. The timeliness of screening reports is also important and the Commission is of the view that annually is not sufficient. Therefore screening reports should be published quarterly and sent directly to all consultees.	Accepted and Included in the Clanmil Housing Equality Scheme			
	The Commission recommends that Associations give consideration to, and outline in schemes, additional specific arrangements to ensure access to their services.	Accepted and Included in the Clanmil Housing Equality Scheme			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	The Commission recommends that consideration for further arrangements for providing information to children and young people, people with learning difficulties or dementia and ethnic minority groups.	Accepted and Included in the Clanmil Housing Equality Scheme			
	The Commission recommends that under the heading of Assessing public access to information and services that the timeline for monitoring is also included.	Accepted and Included in the Clanmil Housing Equality Scheme			
	The Commission recommends that you include in Chapter 10 details of how the review of your equality scheme will be made public.	Accepted and Included in the Clanmil Housing Equality Scheme			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	The Commission recommends provision of a text phone number for people with speech or hearing difficulties.	Accepted and Included in the Clanmil Housing Equality Scheme			
<b>Disability Action</b>	Gaps in data gathering – what impact this has and included in Impact Assessments	To be considered when drawing up Equality Impact Assessments		September 2012	Corporate Services Dept. / Director of Corporate Services
	Placement from Employment Unit – consider supporting disability placements for employment	Agreed – will look at placements	Successful placements for disability groups in employment.	September 2012	Corporate Services Dept. / Director of Corporate Services
	Look at including a “target” for placements within the action plan	One pilot established	Employment placement for one disabled person	Monitor pilot project by December 2012	Corporate Services Dept. / Director of Corporate Services
	Turnaround for response to things – issues need to be prioritised and dealt with quicker	Acknowledgements to be sent and timescales to be followed	Timescales for response included in Equality Scheme	Ongoing – monitored by Corporate Services	All departments

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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	No unnecessary delays in reasonable adjustments that would detrimentally impact on someone with a disability – specifically in reference to adaptations and adjustments re repairs for someone with a disability	Policies to be reviewed with positive statement re reasonable adjustments and prioritising of adaptations for tenants with specific disabilities	Targeted, fair response times	September 2012	Property Services Dept. / Director of Property Services
	Screening on website – email prompt to Consultees	Screening documentation to be placed on website and email sent to those on Consultee List to make them aware – set up email group for notifications	Email prompt	Ongoing – quarterly	Corporate Services Dept. / Director of Corporate Services
	Adaptations to properties – working with NIHE to review process.	Adaptations policy to be reviewed – cost potential budget implications.	Homes adapted fit for purpose	September 2012	Property Services Dept. / Director of Property Services
	Associations need to consider how they fund adaptations with decreasing funding.	Review by Director of Property Services in line with budget setting	Review of adaptations policy costed and budgeted	October 2012	

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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	DA would advise that the Foreword and Appendices are fundamental elements of the equality scheme. DA recommends that this fact be made clear in the revised equality scheme.	Accepted and draft scheme amended to incorporate Foreword into the body of the document.			
	DA notes the commitment from Association to providing the “necessary resources” in terms of people, time and money in the Foreword, however this has been changed to “the necessary ‘available’ resources” in terms of people time and money. DA requests that the word ‘available’ be removed from the revised equality scheme (Item 1.3)	Accepted - Equality Scheme updated to remove the word ‘available’ at point 1.3			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	DA is disappointed that the Audit of Inequalities has not accompanied this Equality Scheme and Action Plan. The Audit of Inequalities is a systematic review and analysis of inequalities which exist for service users and those affected by the Association's policies. The audit should include analysis of information gathered to inform the development of an Action Plan. The	Not accepted. The Audit of Inequalities and Action Plan have been merged and both are included.			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	absence of the Audit of Inequalities renders it impossible for the consultee to understand the rationale for measures in or omitted from the Action Plan.				
	DA believes that the Association should state that the audit of inequalities is a “living” document that will be amended as continued evidence is gathered on newly identified inequalities.	Accepted - Point 2.12 amended to reflect comment made by Disability Action.			
	Additionally, where the audit of inequalities has identified information/evidence gaps, the Association must commit to commission new research (Item 2.2)	Accepted - Point 2.12 amended to reflect comment made by Disability Action.			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
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<b>Equality Issues</b>					
	DA has concerns in regard to targeted consultation. The Association must ensure that it monitors and reviews this approach to consultation to ensure that it is open and accountable to all representative and affected individuals and does not result in a “closed shop” list of consultees.	Not accepted – Clanmil are following best model scheme and recommendation set out by Equality Commission.			
	Additionally, the Association should make direct reference to its attitude to and plans for pre-consultation (Item 3.2.1)				
	Consultation periods should be planned to ensure that they do not take place over holiday periods and the	Not accepted - Had already been included			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	Association should make the commitment to this in the equality scheme (Item 3.2.7)				
	DA recommends that policy and decision makers receive general training on Section 75 and specific training on each of the 9 categories listed under Section 75 to ensure all equality of opportunity implications are considered.	Accepted - Point 5.4 amended to reflect recommendation made by Disability Action			
	Likewise, for those deciding on the likely impact of a policy on equality of opportunity as being minor/major/none. DA believes that the Association must establish a process and provide training to enable these decisions to be made consistently	Accepted Point 4.6 amended to reflect recommendation made by Disability Action			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Deaprtmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	and with informed reasoning throughout the organisation (Item 4.6)				
	Regarding availability of the screening outcomes on the website DA believes consultees should be informed as soon as possible of results otherwise they may not be aware of a screening outcome for 3 months.	Consultees will be notified quarterly by the Association when screening outcomes become available			Corporate Services Dept / Director of Corporate Services
	This is of particular importance where a policy has been screened out as minor or where mitigation or alternative policy has been used. Consultees will have expert knowledge on a given policy's impact that the Association might review as impact neutral.	Clanmil will consider pre screening consultation with targeted consultee groups to assist in the formulation of the policy before full screening takes place.			Corporate Services Dept. / Director of Corporate Services

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	DA believes that there is a danger that policies may appear at first sight devoid of equal opportunity implications however such an assumption may be open to challenge if in their application they have a disproportionate or an adverse impact on any of the affected groups.	Comment noted by the Association.			
	Furthermore it is impossible for the under-resourced community / voluntary sector to check public authorities' websites on a daily basis (Item 4.15)	Comment noted by the Association.			
	DA recommends that all Section 75 training should be reviewed and updated accordingly. Where training is centralised DA believes	Accepted - Point 5.5 amended to reflect recommendation made by Disability Action			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	the Association uses its influence with the training provider (Item 5.5)				
	DA notes that the Association has deviated from Paragraph 8.5 of the ECNI Model Equality Scheme and therefore requests that the Association to address this omission in the revised scheme.	Not accepted. Clanmil has amalgamated the Model Scheme from ECNI to also reflect the timescales in its Complaints Policy, which is more time bound than those set out on the ECNI model scheme.			
	DA believes that the complaints procedure should outline how it will support the individual to bring his/her complaint (eg interpreter support, specialist transport costs, advocacy services). The complaints procedure must be fully accessible and proactively disseminated to those	Accepted - Point 8.7 revised and amended to reflect the comment made by Disability Action.			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	affected by the Section 75 duties (Chapter 8)				
	DA recommends that the Association include a timeline in regard to the provision of alternative formats as stated in Paragraph 3 (Item 9.3)	Accepted - Point 9.3 amended to reflect recommendation made by Disability Action.			
	DA commends the Association for adopting and indeed expanding on the ECNI Model Equality Scheme.				
	In relation to an Audit of Inequalities, DA would make the following recommendations: <ul style="list-style-type: none"> <li>• The audit must provide a clear link to the Association's actual functions, policy areas and strategies</li> </ul>	Departmental function area reflected in Audit of Inequalities			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<ul style="list-style-type: none"> <li>• The Association must clearly show how it has utilised the consultation responses provided by Section 75 representative groups and affected individuals over the past 10 years on equality schemes/screening and EQIAs</li> <li>• The Association must clearly show how it used qualitative and quantitative data held by other public authorities.</li> <li>• All the relevant qualitative and quantitative data that was used as well as findings for each Section 75 category, must be provided to consultees.</li> </ul>	<p>Accepted.</p> <p>Has included reference to data utilised.</p> <p>Available on request.</p>			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental /Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<ul style="list-style-type: none"> <li>• Data, research, evidence and publications must be set out under each of the 9 categories listed under Section 75.</li> <li>• The Association must provide a clear audit trail not a literature review with no findings.</li> <li>• A gap analysis should have been undertaken.</li> <li>• The Audit of Inequalities should clearly outline any gaps in its knowledge and detail how these gaps will be filled e.g. provide details of the specific commissioned research necessary to fill these gaps.</li> </ul>	<p>Not set out in the ECNI scheme</p> <p>Have asked NIFHA to explore what this means with the consultee group.</p> <p>Gap analysis was included when reviewing the audit of inequalities</p>			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental/ Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<ul style="list-style-type: none"> <li>• Audit findings must be cross-referenced to each measure within the Action Plan.</li> <li>• The Association should clearly show how the Audit of Inequalities will be used to inform the screening process.</li> <li>• Data collected must be used to inform future screening and EQIAs.</li> <li>• The Association should include a clear statement that the audit of inequalities is a living document that will be updated and amended.</li> <li>• There should be information on how the Audit of Inequalities informs the Association necessary resource allocation in terms of people, time and money.</li> </ul>	<p>The Audit of Inequalities influences and forms the basis of the action plan.</p> <p>Accepted.</p> <p>Is included.</p> <p>Not included in the ECNI model scheme which has been adopted.</p>			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<ul style="list-style-type: none"> <li>• Absence of evidence must not mean that acknowledged inequalities are ignored. There is an opportunity to tackle entrenched and persistent inequalities faced by disabled people.</li> <li>• Data on inequalities must be collected across both Duties 1 and 2 of Section 75 of the Northern Ireland Act 1998.</li> <li>• DA expects an audit of inequalities to be a robust analysis of all 9 Section 75 categories, in particular for disabled people, across all functions and policy areas. Failure to do so will render the Action Plan fundamentally flawed.</li> </ul>	Comment noted.			
		Comment noted.			
		Comment noted.			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<p>In relation to the Action Plan DA would make the following comments:</p> <ul style="list-style-type: none"> <li>• Action measures should be clearly linked to the functions of the Association. This is not the case.</li> <li>• A cross reference of the Association's audit findings and their link to action measures should be included for ease of reference.</li> <li>• Action measures must be clearly specific to each of the 9 affected groups listed under Section 75.</li> <li>• Multiple identity action measures must also be clearly specified across the 9 categories.</li> </ul>	<p>Accepted and has been included to reference Housing functional areas.</p> <p>Audit of Inequalities and Action plan has been amalgamated.</p> <p>This is included.</p> <p>This is included.</p>			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<ul style="list-style-type: none"> <li>• An Action Plan should detail whether measures are new or ongoing action. This Plan does not provide such detail.</li> <li>• Clear indication if actions are new as a direct result of the audit of inequalities.</li> <li>• The Association's Action Plan must include measures to address any gaps identified.</li> <li>• The collection of the qualitative and quantitative data, on the gaps, must be an action measure in each subsequent year.</li> <li>• Information must be provided on how the Action Plan measures were prioritised.</li> </ul>	<p>Clanmil will consider as the action plan develops.</p> <p>Agreed and included.</p> <p>Agreed and will be included as the action plan develops</p>			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<ul style="list-style-type: none"> <li>• The Action Plan must contain SMART objectives including a timetable with expected outputs and outcomes.</li> <li>• Timetables must relate to achieving outcomes and not implementation dates which reflect the beginning of the process.</li> <li>• The review of the audit of inequalities must be an action measure.</li> <li>• Monitoring and evaluation must be an action measure.</li> <li>• A full review of the Action Plan after 1 year should be included as an action measure.</li> </ul>	<p>Clanmil believe their Action Plan does have SMART objectives.</p> <p>Conclusion dates will be included separately and agreed with Departments responsible in the context of departmental operational planning process</p> <p>Included in the Action Plan.</p> <p>Included in the Action Plan.</p> <p>Included in the Action Plan</p>			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	<ul style="list-style-type: none"> <li>• The Plan should include a clear outline of how the Action Plan interacts with Corporate and Business Planning measures.</li> <li>• Action measures related to the Association's strategic as well as operational functions should be included.</li> <li>• The Association must make clear that the Action Plan is a living document that can be added to and amended as other inequalities are identified.</li> <li>• A clear statement on whether action measures are relevant to Duties 1 and 2 of Section 75 should be included.</li> </ul>	<p>The Action Plan has been cross referred and included in all operational plans within the Association.</p> <p>Comment noted.</p> <p>Accepted.</p> <p>Will consider as scheme progresses and staff become more familiar with new screening arrangements.</p>			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	DA believes that the contact details throughout the document should include a textphone or dedicated SMS number to enable deaf people the same access as those who are hearing (Item 2.4)	Textphone number included throughout the document.			
	DA believes that the Association should also commit to consulting on its Audit of Inequalities and screening of policies (Item 3.1)	Clanmil Housing have included.			

Consultee Group	Action Measure/Description What is it you are trying to achieve? Are there any constraints?	Performance Indicator		Timescale & Description of Monitoring Arrangements	Departmental / Lead Responsibility
		Output	Outcome /Impact (For S75 Groups)		
<b>Equality Issues</b>					
	DA notes that the Association has deviated from paragraph 4.25 of the ECNI Model Equality Scheme and therefore requests that the Association address this omission	Not relevant to our Model Equality Scheme.			
	DA refers the Association to paragraphs 23 – 26				
	DA notes the absence of Bullet Point 4 of Paragraph 9.3 of ECNI Model Equality Scheme in regard to communicating the Equality Scheme to children and young people and people with disabilities therefore requests the Association to address this omission in the revised Equality Scheme (Item 9.3)	Is included in Clanmil Housing Scheme.			

## Annex A – Participation in workshops

Association	Sept 2011	Nov 2011	Jan 2012
Abbeyfield (UK) NI	✓		✓
Alpha			✓
Apex	✓	✓	✓
Ark		✓	✓
Broadway	✓		✓
Clanmil	✓	✓	✓
Connswater	✓	✓	✓
Co-Ownership	✓	✓	✓
Covenanter		✓	
Filor	✓	✓	✓
Flax	✓	✓	✓
FOLD	✓	✓	✓
Gosford			
Grove	✓		✓
Habinteg	✓	✓	✓
Harmony	✓		
Hearth			✓
Helm	✓		✓
Newington	✓	✓	✓
Oaklee	✓	✓	✓
Open Door	✓	✓	✓
Rural			✓
SHAC	✓	✓	✓
South Ulster	✓	✓	✓
St Matthew's	✓	✓	✓
Triangle	✓	✓	✓
Trinity	✓	✓	✓
Ulidia	✓	✓	✓
Wesley	✓	✓	

## **Annex B**

### **Research / Data considered**

- ECNI Statement on Key Inequalities in Northern Ireland
- A Picture of Caring, ECNI
- Draft Older Peoples Health and Well Being Strategy 2005-2015, EHSSB
- Equality Impact Assessments conducted by Housing Associations 2005-10
- Equality Impact Assessments conducted by the Department
- Improving sexual orientation monitoring, Equality and Human Rights Commission
- Internal association information (e.g. Art 55 reviews, Tenant Profile data)
- Next Generation Equality Scheme Information Overview, NIHE
- NICORE Overview Data as at 31 March 2005 and 31 March 2010
- NI Peace Monitoring Report, Community Relations Council
- Northern Ireland Statistics and Research Agency (NISRA)
- The Northern Ireland Housing Market: Review and Perspectives 2007 – 2010
- Through Our Eyes: Experiences of Lesbian, Gay and Bisexual People in the Workplace
- Towards an Ageing Society, HACT
- Travellers' Accommodation Needs Assessment in Northern Ireland

**Please Note:** Further statistical information may also be used / provided by the individual housing association.

## APPENDIX 7 – COPORATE TRAINING PLAN

Course Title	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar
Corporate Induction	AS AND WHEN REQUIRED											
Equality at Work			6					11				
Appraisee												
Appraiser												
Fire Safety Training								24,25				
Risk Assessment						5						
Manual Handling				28			27	14	12,19	26		6
Recruitment & Selection			21					7				
First Aid							24					
Level 2 Food Safety in Catering						27	25					
Data Protection			28 28		23	6				5		
Complaints		24			16	12	6					
COSHH					2		13			16, 20		13

Course Title	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar
Values & Attitudes								1	8			
Safeguarding of Vulnerable Adults		25			2	14						7
Dementia Awareness							18, 19, 20		6			
CDM Regulations												
Drug & Alcohol Awareness					31					24		
Medication Training									18	1		
Child Protection Training										7		
Dental Hygiene Training										7,9		
Professional Investigations Training										16		
CSR		20										
Support Plans						14						
Challenging Behaviour in the Elderly					25							
Traveller Awareness								Pro 15				
Brain Injury		29										

## **COMPLIMENTS, SUGGESTIONS AND COMPLAINTS POLICY**

**This policy is available in alternative formats on request e.g. large print, audio cassette, Braille. The policy is also available in alternative languages. Requests should be forwarded to the head of**

### **WHY HAVE A COMPLIMENTS, SUGGESTION AND COMPLAINTS PROCEDURE?**

Clanmil Housing aims to provide you with a first class service all of the time. There may, however, be occasions when you are not happy about our service, and, if this is the case, it is important that you let us know so that we can try and put it right.

At Clanmil our staff are encouraged to be positive about complaints and adopt a 'can do' attitude so, that when something does go wrong, we learn from our mistakes so that we're less likely to make the same mistake again.

On the other hand there will be times when you have been extremely satisfied with a particular aspect of our service and we would also like to hear of these instances.

Where a particular service is not currently provided and you feel you feel it should or, you feel a particular service could be improved the Association operates a suggestion scheme and welcomes ideas on improvements that you may have.

The aim of this policy is to give you guidance on what to do if you wish to forward a compliment, suggestion or complaint to the Association. It also gives us the chance to monitor the quality of the service we provide so that we can continually work to improve what we do.

### **WHO CAN USE THE COMPLIMENTS, SUGGESTIONS AND COMPLAINTS PROCEDURE?**

Anyone who receives or requests a service from the Association can use the Complaints Procedure. This includes tenants and residents, people applying for housing and anyone living in neighbouring property. The procedure is also open to people acting on your behalf, such as a Councillor, Member of Parliament, Advice Agency or Solicitor (but as you will see later if you are making a complaint, we do encourage you to try to sort things out with us first).

## **COMPLIMENTS**

Where you feel you have received a service which you have been extremely happy with, we would be delighted to hear from you. Forms are held at all of our schemes and at Northern Whig House. Please complete the forms and post in the boxes provided. For those of you where forms are not held (i.e. our general need schemes) please ring Northern Whig House 028 9087 6000 and a form will be posted out to you by a member of staff.

## **SUGGESTIONS**

We are constantly looking at ways in which our service(s) can be improved and would be delighted to hear from you if you feel a service can be improved or indeed provide if this is not already the case. Suggestion forms are held at all schemes and these should be completed and placed in the boxes provided. For those of you where forms are not held (i.e. our general need schemes) please ring Northern Whig House 028 9087 6000 and a form will be posted out to you by a member of staff.

On receipt of suggestion forms they will be acknowledged by the Association and the person making the suggestion will be advised of the subsequent outcome.

## **DEFINITION OF A COMPLAINT**

For consistency with the Northern Ireland Ombudsman's office, the Association uses the following as a definition of a complaint:-

*'any oral or written expression of dissatisfaction by any person, however made, about the service, actions or inactions of a body or its officers which requires a response'*

### **1 COMPLAINTS - WHAT CAN YOU COMPLAIN ABOUT?**

An expression of dissatisfaction can take many forms, however, you may wish to forward a complaint about any of the following:-

- *if a repair has not been carried out properly;*
- *if you have not received information you have asked for;*
- *if you are unhappy with the way any rent arrears have been dealt with;*
- *if you feel that a member of staff, Board Member or a Contractor has not behaved reasonably towards you;*
- *if you feel that your housing application has not been handled properly;*

1<sup>st</sup> August 2012

- *if you feel that you have been unfairly discriminated against.*

## **2 WHEN CAN YOU COMPLAIN?**

It is in the best interests of everyone that any complaint is brought to the attention of the Association as soon as the facts are available. We do of course, expect any complainant to provide accurate information to us in respect of their complaint. This will allow our staff to investigate the complaint a lot quicker than if issues are brought to our attention at a later date.

As a general rule we would normally expect any complaint to be brought to our attention within six months, however, where facts only become known to someone after this period, we will of course investigate the matter in accordance with this policy.

### **REMEDIES TO A COMPLAINT**

Remedies to complaints need to be proportionate to the wrong that has been highlighted by the complainant and may include on or more of the following:-

- an apology;
- an explanation;
- correcting the error;
- carrying out a service improvement;
- a change in policy or procedure; or
- financial compensation.

## **3 NEIGHBOUR NUISANCE/ANTI-SOCIAL BEHAVIOUR**

You should note that a separate procedure exists for dealing with complaints relating to neighbour nuisance and anti social behaviour. In the event of such a problem you should first raise it with the neighbour concerned before contacting the office. However, If the problem cannot be resolved between you and your neighbour, you should write to your Housing Officer at Northern Whig House, 3 Waring Street, Belfast BT1 2DX Tel: 028 9087 6000. Alternatively, you can e-mail us at [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk)

### **STAGE 1**

Anyone wishing to make a complaint can do so in the following ways:-

- by completing a complaints form (held at all schemes);
- by letter;
- by email; (using the Association's web site at [www.clanmil.org](http://www.clanmil.org));
- in person;
- by telephone;
- by textphone

When you make a complaint, it is important for you to let us know exactly what the problem is and how you would like to see it resolved. We would encourage you to do this in writing using the forms provided. However, complaints made using any of the above methods will all be handled in the same way.

Complaints at Stage 1 will be dealt with by one of the following members of staff:-

**Home Manager** – for all matters relating to our Housing with Care schemes

**Scheme Coordinator/Housing Support Worker**– for all matters relating to our Sheltered Housing and Supported Housing

**Development Officer\*** – for all issues relating to schemes under construction

**Maintenance Officer\*** – for all repairs and landscaping issues

**Housing Officer\*** – for Housing Management issues and complaints from general needs tenants

**Finance Officer\*** – for finance related matters

**Health, Safety and Business Improvement Officer\*** – for health, safety and quality matters

**Corporate Services Officer\*** – for personnel/employment related matters

\* these staff are based at Clanmil's Head Office at Northern Whig House,  
3 Waring Street, Belfast, BT1 2DX

It should be noted that where a complaint has not been resolved by Scheme Coordinators at Stage 1, and the complaint is subsequently passed to Head Office, the complaint will, on those occasions, be dealt with initially by the relevant Housing Officer.

If you have made a complaint by telephone or in person, the member of staff who notes the complaint will check with you that they have taken a correct record. A copy of this record will be read to you to ensure that everyone is clear on what the complaint is about.

## **ACKNOWLEDGEMENT**

Whenever we have received your complaint we will write to you within three working days to acknowledge that your complaint has been received and is being dealt with. Normally we will write to you again within two weeks of receiving your complaint to let you know the outcome. Do please remember that some things may not be within our control and may be more difficult to sort out. Should we be able to resolve the matter within the published timescale, the investigating officer, or delegated member of staff, will advise you accordingly. If we are not able to resolve the matter within the published timescale, we will advise you of the reason and how long it is likely to take to resolve the matter.

1<sup>st</sup> August 2012

## **STAGE 2**

If you feel the response you receive at Stage 1 is not satisfactory, or you have not received a reply within the advised timescale, you may request an interview with a senior manager of the department to whom you have made a complaint – these are:-

- Director of Housing;
- Director of Property Services;
- Finance Director;
- Director of Corporate Services;
- Maintenance Manager;
- Development Manager;
- Housing Services Manager;
- Housing Manager;

You must clearly state why you are not satisfied with the response you have received and how you want the matter resolved. Your complaint will then be reviewed by one of the senior managers above and a response forwarded to you within 15 working days from the date your complaint is received.

## **STAGE 3**

If you are dissatisfied with the response of the Senior Manager at Stage 2, you are entitled to refer the matter, in writing, to the Chief Executive, again stating clearly why you remain dissatisfied with how your complaint has been handled and what you want us to do to remedy the matter.

The Chief Executive will acknowledge receipt of your complaint and will respond to you within 15 working days from the date your complaint is received.

## **TAKING YOUR COMPLAINT FURTHER - APPEAL PROCEDURE**

If you are still not satisfied with the response from the Chief Executive, or if you have not received a response, the matter may then be referred to the Board of Management. You should write to the Chief Executive requesting that the matter be referred to the Board of Management clearly stating the nature of the complaint. The matter will then be referred to the appropriate Board Committee for consideration. You will be advised of the likely timescale.

The Committee will review the evidence submitted and will arrange, if necessary, an interview with you to talk about the matter. In this case you are very welcome to bring along a friend or advisor. The Committee will refer back to the Board and the Board will give you its decision in writing.

## **WHO WILL KNOW ABOUT MY COMPLAINT?**

We will, as far as possible, respect the confidentiality of your complaint. Whilst we are looking into your complaint your name will not be divulged unless it is necessary.

You will appreciate, however, that if your complaint involves another tenant or a member of staff it may be very difficult for us to look into this without talking to that tenant or staff member. We will try to respect your wishes, but if we cannot talk to the person involved, it may not be possible for us to take action to resolve the problem.

We will always try to deal with complaints sympathetically, but there are some things about which we will not be able to give you information. For example, it would be wrong for us to discuss with you the details of someone else's housing application, as this would be a breach of confidentiality. We can, of course, talk to you about how our allocation procedure works.

## **ANONYMOUS COMPLAINTS**

Due to their very nature, we cannot of course acknowledge anonymous complaints. Any anonymous complaint received will be referred to a senior manager of staff who will review the complaint and decide if the matter needs to be investigated further.

## **GETTING INDEPENDENT ADVICE**

We would always hope that a problem can be sorted out before you feel it is necessary to make a complaint. However, you may feel it is important to get independent advice before you decide whether to complain to us formally. Advice agencies include:-

- ***Welfare Rights Service***
- ***Housing Rights Service***
- ***Citizens Advice Bureau***
- ***Law Centre***
- ***Solicitor***

## **HOW DO WE RECORD AND MONITOR COMPLAINTS?**

Complaints can help us as well as you! All complaints forwarded to the Association are recorded and reported to the Chief Executive. In addition to ongoing review of complaints by the Chief Executive and the Senior Management Team, a meeting is held annually to review all complaints received by the Association.

## **POLICY ON UNACCEPTABLE ACTIONS OR BEHAVIOUR BY COMPLAINANTS**

Clanmil understands that individuals may act out of character in times of difficulty or distress. Indeed a complainant may have encountered upsetting or distressing circumstances prior to bringing a complaint to the Association. Clanmil does not therefore view actions or behaviour as unacceptable simply because a complainant is assertive or determined.

However, the actions or behaviour of complainants who are angry, demanding or persistent may result in unreasonable demands on the Association or unacceptable behaviour towards Clanmil staff. It is these actions or behaviours that the Association considers unacceptable and the Association's policy on unacceptable actions or behaviour is shown at Appendix 3.

## **FURTHER INFORMATION IN RESPECT OF COMPLAINTS CAN BE OBTAINED FROM THE ASSOCIATION AT:**

Northern Whig House  
3 Waring Street  
Belfast  
BT1 2DX

Tel: 028 9087 6000 Fax: 028 9087 6001 Textphone: 028 9032 9914

e-mail: [housing@clanmil.org.uk](mailto:housing@clanmil.org.uk) Website: [www.clanmil.org](http://www.clanmil.org)

## **COMPLAINTS UNDER OUR EQUALITY SCHEME – SECTION 75 DUTIES**

From 1<sup>st</sup> April 2004, Clanmil Housing has been designated a public authority and as such has a specific responsibility under Section 75 of the Northern Ireland Act 1998 that requires the Association in carrying out all its functions, powers and duties, 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;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without

If you feel that you would like to highlight any Clanmil policy or procedure which, you feel, breaches the nine groups designated under the Section 75 duties, please contact the Director of Corporate Services in the first instance, in writing, clearly indicating the perceived breach. Where a complainant is unable to forward a written complaint, he/she should contact the Association and necessary arrangements will be made on behalf of the complainant.

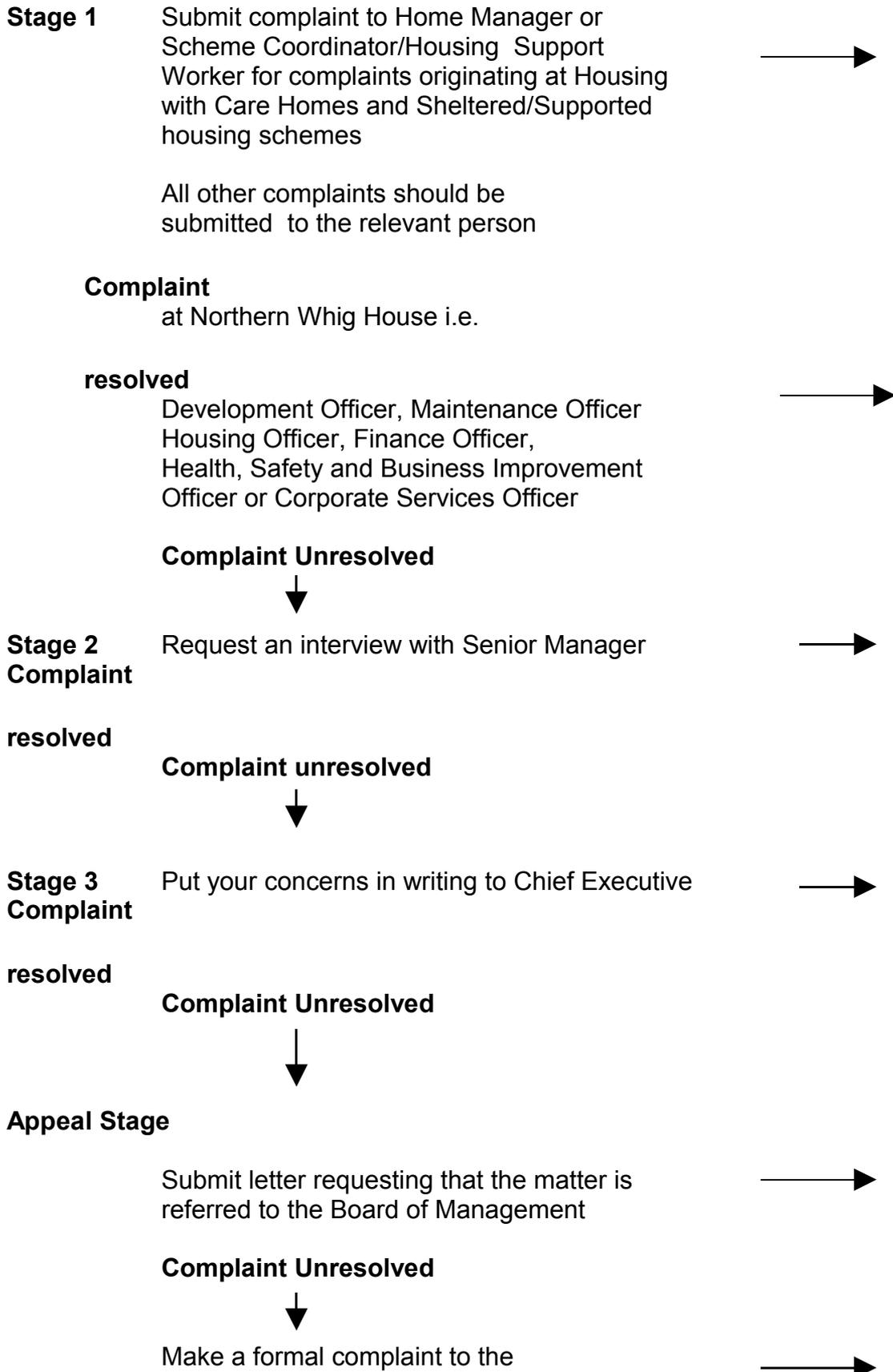
An internal investigation will be carried out and a response will be returned within one month. The complainant will be kept updated throughout the process.

If the complainant is unhappy with the outcome, he/she may speak to the Equality Commission for Northern Ireland. The Equality Commission has the power to refer the case to the Secretary of State for Northern Ireland. Clanmil Housing will cooperate fully with any investigation into the complaint.

If you require any further details please contact the Director of Corporate Services. The Equality Scheme for Clanmil Housing can be seen at its website at the following address:-

[www.clanmil.org](http://www.clanmil.org)

**COMPLAINT PROCESS**



NI Ombudsman or HSCT (for HWC)  
– see Appendices 2 & 5

**COMPLAINTS TO THE NORTHERN IRELAND OMBUDSMAN**

The Northern Ireland Ombudsman provides an external complaints procedure for all registered Housing Association tenants/residents and applicants for tenancies including those of Clanmil Housing.

This is a free and impartial service and a leaflet is available from the Association's offices in Waring Street or from the Ombudsman's office below office. It is important to note that before the Ombudsman's will normally deal with your complaint, you should first have gone through the Association's own procedure. If, however, if you are unhappy with our procedures the Ombudsman may be willing to investigate.

This procedure is open to anyone who receives a service from the Association.

The contact address of the Ombudsman's office is:

The Northern Ireland Ombudsman  
33 Wellington Place  
Belfast  
BT1 6HN

Tel: 028 9023 3821

Fax: 028 9023 4912

e-mail [ombudsman@ni-ombudsman.org.uk](mailto:ombudsman@ni-ombudsman.org.uk)

web [www.niombudsman.org.uk](http://www.niombudsman.org.uk)

## **APPENDIX 3**

### **POLICY ON UNACCEPTABLE ACTIONS OR BEHAVIOUR BY COMPLAINANTS**

This section of our policy sets out the procedure to be adopted by staff of Clanmil Housing in dealing with the relatively few complainants whose actions or behaviour the Association considers to be unacceptable. In this policy document the term complainant includes anyone acting on behalf of a complainant or who contacts Clanmil in relation to a complaint.

#### **AIMS**

- a. To deal fairly, honestly, consistently and appropriately with all complainants, including those whose actions or behaviour it considers to be unacceptable.
  - Clanmil believes that all complainants have the right to be heard, understood and respected. However, the Association also believes that it must balance the rights of an individual to register a complaint and the recognition that, notwithstanding their actions or behaviour, they may have a legitimate complaint, with the rights of the staff of Clanmil not to be subjected to unacceptable actions or behaviour.
- b. To provide a service that is accessible to all complainants. However, Clanmil retains the right, where it considers a complainant's actions or behaviour to be unacceptable, to restrict or change access to that service.
- c. To ensure that complainants by their behaviour or conduct do not disadvantage other complainants or Clanmil staff.

#### **DEFINING UNACCEPTABLE ACTIONS OR BEHAVIOUR**

Clanmil has grouped these potentially unacceptable actions or behaviours under three broad headings:

##### **Aggressive or Abusive Behaviour**

- Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (whether oral or written) that may cause staff to feel afraid, threatened or abused.

1<sup>st</sup> August 2012

- Examples of actions or behaviours grouped under this heading include threats, physical violence, personal verbal abuse, derogatory remarks and rudeness. Clanmil also considers that inflammatory statements and unsubstantiated allegations may be regarded as abusive behaviour.
- Clanmil expects its staff to be treated courteously and with respect. Violence or abuse towards staff is unacceptable. Clanmil staff understand that the anger felt by many complainants is directed towards the subject matter of their complaint. However, it is not acceptable when that anger escalates into aggression directed towards the staff of the Office.

#### Unreasonable Demands

- Complainants may make what Clanmil considers to be unreasonable demands through the amount of information they seek, the nature and scale of service they expect or the number of approaches they make. What amounts to unreasonable demands will always depend on the circumstances surrounding the behaviour and the seriousness of the issues raised by the complainant.
- Examples of actions grouped under this heading include vexatious complaints (see Appendix 4), demanding responses within an unreasonable time-scale, insisting on seeing or speaking to a particular member of staff who is unavailable, continual phone calls or letters, repeatedly changing the substance and focus of the complaint or raising unrelated concerns.
- Clanmil may consider such demands as unacceptable and unreasonable if they start to impact substantially on the work of Clanmil, such as taking up an excessive amount of staff time to the disadvantage of other complainants or functions.

#### Unreasonable Persistence

- Clanmil recognises that some complainants will not or cannot accept that its staff is unable to assist them further or provide a level of service other than that provided already. Complainants may persist in disagreeing with the action or decision taken in relation to their complaint or contact the office persistently about the same issue.

- Examples of actions grouped under this heading include vexatious complaints (see Appendix 4), persistent refusal to accept a decision made in relation to a complaint, persistent refusal to accept explanations relating to what Clanmil can or cannot do and continuing to pursue a complaint without presenting any new information. The way in which these complainants approach the Association may be entirely reasonable, but it is their persistent behaviour in continuing to do so that is not.
- Clanmil considers the actions of persistent complainants to be unacceptable when they take up what it regards as being a disproportionate amount of time and resources.
- Appendix 4 to this policy document contains guidance on the circumstances in which a persistent complainant may be regarded as a vexatious complainant.

### **MANAGING UNACCEPTABLE ACTIONS OR BEHAVIOUR**

There are relatively few complainants whose actions or behaviour the Association will consider to be unacceptable. How the Association aims to manage those actions or behaviour depends on its nature and extent. If it adversely affects the Association's ability to do its work and provide a service to others, the Association may need to restrict complainant contact with the Association in order to manage the unacceptable actions or behaviour. The Office aims to do this in a way, wherever possible, that allows a complaint to progress to completion through the Office's normal Complaints Handling Process. The Office may restrict contact in person, by telephone, fax, letter or electronically or by any combination of these.

Clanmil will endeavour to maintain at least one form of contact. In extreme situations, the Association may inform the complainant in writing that their name is on a "no personal contact" list. This means that they must restrict contact with the Office to either written communication or through a third party.

The threat or use of physical violence, verbal abuse or harassment towards Clanmil staff is likely to result in the ending of all direct contact with the complainant. Incidents may be reported to the police. This will normally be the case if physical violence is used or threatened.

Specific guidance for staff in managing unacceptable action or behaviour is contained in separate procedures.

**VEXATIOUS COMPLAINANTS**

A complainant may fall into the category of habitual or vexatious where previous or current contact with them demonstrates any, but normally two or more, of the following criteria:

Where complainants:

- change the substance of a complaint or continually raise new issues or seek to prolong contact by continually raising further concerns or questions upon receipt of a response whilst the complaint is being addressed. (Care must be taken not to discard new issues that are significantly different from the original complaint. These might need to be addressed as separate complaints.) .
- are unwilling to accept documented evidence as being factual; deny receipt of an adequate response in spite of correspondence specifically answering their questions; or do not accept that facts can sometimes be difficult to verify when a long period of time has elapsed.
- do not clearly identify the precise issues which they wish to have investigated, despite reasonable efforts of staff and, where appropriate, third party advisors to help them specify their concerns; and/or where the concerns identified are not within the Association's remit to investigate.
- focus on a trivial matter to an extent that is out of proportion to its significance and continue to focus on this point. It is recognised that determining what is a "trivial" matter can be subjective and careful judgment must be used in applying this criterion.
- have, in the course of their complaint, had an excessive number of contacts with the Association placing unreasonable demands on staff. (A contact may be in person or by telephone, letter or fax. Discretion must be used in determining the precise number of 'excessive contacts' applicable under this section, using judgment based on the specific circumstances of each individual case.)
- have harassed or been personally abusive or verbally aggressive on more than one occasion towards staff dealing with their complaint. (Staff must recognise that complainants may sometimes act out of character at times of stress, anxiety, or distress and should make reasonable allowances for this. They should document all incidents of harassment.)

- are known to have recorded meetings or face-to-face/telephone conversations without the prior knowledge and consent of other parties involved.
- display unreasonable demands or expectations and fail to accept that these may be unreasonable (e.g. insist on responses to complaints or enquiries being provided more urgently than is reasonable or normal recognised practice).

**COMPLAINTS TO HEALTH SOCIAL CARE TRUSTS**

Clanmil encourages its residents to forward any complaints to the Home Manager at each home. However, if a resident has been placed into the Home through a HSC Trust, the resident, or person(s) acting on their behalf (providing they have obtained the resident's permission), can forward their complaint directly to the Trust who placed the resident into the Home.

The HSC Trust will then consider the complaint and decide how best to proceed.

**ROLE OF RQIA**

With regard to complaints made to Clanmil or the HSC Trust, the RQIA has a duty to report on how they handle complaints. They will, therefore, as part of their inspection process, assess the effectiveness of Clanmil's procedures to identify any wider issues for the purposes of raising standards. Clanmil is obliged to make complaints available to RQIA inspectors during inspections on request.

In circumstances where the RQIA is notified of a complaint that could impact on quality or standards, or a breach of Regulation, the RQIA will be required to investigate the matter and determine what action is necessary.

The contact address for the RQIA is:

The Regulation & Quality Improvement Authority,  
9<sup>th</sup> Floor Riverside Tower  
5 Lanyon Place  
Belfast.  
BT1 3BT

Telephone (028) 9051 7500

Fax (028) 9051 7501

