
1. INTRODUCTION

Statutory Equality Duties

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

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

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

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

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

A report describing the results of the screening process is available from Karen Stilges, Head of Corporate Services, Clanmil Housing on Tel : 028 90 876000 or karen.stilges@clanmil.org.uk or requesting through the website at www.clanmil.org.uk

1.4 Following this screening process and the associated consultation, the Association developed a 5-year Equality Impact Assessment programme. The Access and Communications policy was scheduled for assessment in year one of this programme.

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

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

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

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

About Clanmil Housing Association

1. History of the Association

Clanmil Housing is a charitable Housing Association registered with the Department of Social Development. It is a voluntary non-profit making organisation.

Over the years we have developed an expertise in both building and managing housing for older people, people with disabilities and special needs. We also have experience of providing care directly and in partnership. Today we are involved in the development and management of affordable housing all over Ireland for anyone in housing need. Our housing stock is made up of sheltered accommodation, 3 residential care homes, specialized housing units and general family housing. We have over 1600 units throughout Northern Ireland and over 160 staff.

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

3.0 The Policy

Description of Policy

3.1 The Access and Communications policy outlines how the Association provides access to information and all of its services, and how it communicates with customers and other stakeholders. This is a broad policy that covers:

1. The whole range of methods that customers use to contact the Association and access its services or information about them
2. The accessibility of information about the Association and its services

Policy Aim

3.2 The aim of the Access and Communications policy is:

As far as is reasonable within available resources, and in accordance with legislation, regulations and best practice, to ensure that there is equality of opportunity for everyone seeking information or services provided by the Association

Scope of Review

3.3 The main stakeholders in relation to the policy include anyone seeking to access any of the Association's services or obtain information about them. This can be any of the following:

External

- Tenants
- Resident of agency managed supported housing schemes
- Applicants for housing
- Job applicants
- General public
- Elected representatives
- Community representatives
- Partners
- Other Associations
- Department for Social Development
- NIHE
- Other statutory agencies
- S75 representative groups
- Inspection and assessment bodies
- Suppliers

Internal

- Board members
- Management
- Staff

Former

- Past tenants

This list is not exhaustive.

3.4 The Access and Communications policy is intrinsically linked to all of the Association's key policies and processes. This includes:

- Corporate Services
 - Housing Management
 - Maintenance
 - Development
 - Allocations
 - Complaints
 - House Sales
 - Care and Support.
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3.5 We anticipate that access issues will be considered during all equality impact assessments. Whilst considered to be important by the Association, the following areas do not come under the scope of this equality impact assessment:

- (a) All Housing Associations are obligated to allocate properties in accordance with the common selection scheme. This scheme was devised by the Department for Social Development and the Northern Ireland Housing Executive. Housing Associations have no input into the development of this scheme. The implementation of the allocations policy will be covered under the Housing Management EQIA
- (b) There are certain documents that the Association does not make available to the public. This is a governance issue that does not relate to this review
- (c) The physical accessibility of tenants' homes will be considered under the review of maintenance policies. This assessment relates only to buildings from which the Association delivers services to its customers
- (d) The Department for Social Development manages access to the development programme. This will not form part of this assessment
- (e) This assessment covers only those publications produced by the Association. It excludes all other documents produced by other bodies, which are made available to the Association's customers
- (f) The review does not address the uptake of specific services. This will be considered during subsequent assessments of the Association's main services.

Legislative and Regulatory Requirements

3.6 The Association is required to comply with the following legislative and regulatory requirements:

- Disability Discrimination Act
- DSD Regulatory Framework / DSD Directives
- Industrial and Provident Societies Act (Northern Ireland) 1969 and 1976
- The Registered Housing Associations (Accounting Requirements) Order (Northern Ireland) 1993
- Employment legislation
- Regulation and Inspection Units for Residential Care
- Health and Safety Legislation

3.7 Clanmil Housing also must meet certain obligations, under its Equality Scheme, to ensure that all current and future customers have ready access to its services and information about them. Specific considerations need to be given to some groups who do 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;
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- Members of minority ethnic groups, whose first language is not English, and who may have difficulties with information provided only in English.

Reasons for Equality Impact Assessment

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

- (g) Whilst specific initiatives are in place as part of our commitment to delivering an excellent customer service, Clanmil Housing Association has no overall, formal, written access and communications policy. The equality impact assessment presented an opportunity to clearly define and formalize the policy and seek to develop a standardized policy throughout the Housing Association sector
- (h) The Association believes that access to services and information is of high importance to S75 groups
- (i) Clanmil also believes that its access and communication policy merited an equality impact assessment because particular groups are likely to have greater difficulty than others in accessing its services or information about them, and access needs are likely to vary amongst the statutory groups
- (j) The Association provides services to a diverse range of customers including many client groups with special needs
- (k) Due to the absence of available data at the time of screening the policy, the decision was taken to assess actual adverse impacts during the conduct of the equality impact assessment

Implementation of the policy

3.9 The Access and Communication policy has been defined by the Association's management team. It is implemented by all staff throughout the Association. The key aspects of current policy are presented below.

Standards

3.10 All methods of access, along with opening times and arrangements for out-of-hours contact, are agreed by **The Board of Clanmil Housing and The Senior Management Team.**

Contact Methods

3.11 Customers can contact the Association through in a variety of ways including:

- The main office at Northern Whig House, 3 Waring Street, Belfast, BT1 2DX
 - The North West Regional Office at 20 Somme Park, Altnagelivlin, Londonderry, BT47 2NE
 - Telephone and Textphone and the out of hours service from Telecare
 - Repairs Line on 028 90 876019
 - E-mail – general and employee specific
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- Written correspondence
 - Website – www. Clanmil.org.uk
 - Local scheme based staff
 - Home visits
 - Publications. Promotional literature
 - In person by visiting our offices

Types of Communications

3.12 The most common ways in which Clanmil Housing communicates with internal and external customers are:

- By telephone / textphone
- By written correspondence
- By email / through the website
- In person
- Through tenant newsletters / staff newsletters / Annual Report

3.13 Examples of information commonly requested by customers are:

- Housing applications
- Allocations
- Rent enquiries
- Neighbourhood disputes
- Repair requests
- Employment applications
- Stock enquiries
- Complaints updates
- Details of support and care services

Offices

3.14 Head Office, Northern Whig House, 3 Waring Street, Belfast BT1 2DX. The opening hours are 9.00am – 5.00pm with a telephone service from 8.00am – 6.00pm. There is also an out of hours service for emergency requests.

Regional Office, The North West Regional Office at 20 Somme Park, Altnagelivin, Londonderry, BT47 2NE. The opening hours are 9.00am to 5.00pm. There is also an out of hours service for emergency requests.

Telephone

3.15 Main Office – 028 90 876000 / Textphone
Regional Office – 028 71 342573
Out of hours telecare service – 028 90 421010
Repairs line – 028 90 876019
Language Line - 02084303040

Website/E-mail

3.16 The website www.clanmil.org.uk – The website has been developed and enabled with Text Only and Browsealoud to enable access for those with visual / hearing impairments.

Written Correspondence

3.17 The communications policy states that business correspondence and promotional literature will be formatted in no less than font 12, but ideally in font 14. We are also looking at adopting the Guidelines of the Plain English Campaign.

Personal Contact

3.18 There is a daily contact procedure for all tenants in sheltered housing.

There is a sign up procedure for new tenants and a “getting to know you session” in person for all new tenants in new developments.

There is a policy for viewing days held at new development schemes for prospective tenants.

In Sheltered Schemes there are scheme based staff, who provide personal contact for tenants on site.

There are transfer visits to all tenants requesting transfers

There are appointed duty officers on call in Head Office for personal tenant visits 9.00am – 5.00pm Monday to Friday.

Any tenant can request a home visit at any stage of their tenancy.

Meetings

3.19 Clanmil have a policy of tenant participation which includes quarterly tenant forum meetings, which in practice include powerpoint presentations and the use of the Loop system for the hearing impaired.

There is 2 general tenant meetings at each of the schemes annually. Clanmil produce a scheme visit notice and these are issued to each tenant and placed on the notice board. There are arrangements in place at each scheme to notify in person any tenant with a disability / illness / literacy impairment.

Pre tenancy training for tenants in new developments.

Consultation meetings to seek feedback from tenants on services effecting them for example changes to properties in relation to Planned and cyclical Maintenance, and proposed changes to the service for example the introduction of a non resident scheme co-ordinator.

Tenant Forum invited to the AGM

Tenant representatives sit on the Clanmil Board of Management.

Regular on site meetings with scheme based staff with the tenants.
One to one meetings for tenants who have personal difficulty / illness
accessing the public meetings.

Community Consultation Policy.

Translators, Advocates and Signers

3.20 The association has signed up to the installation of language line to provide accessibility for customers from other ethnic backgrounds. We also hold a bank of translation services which we have utilised on an ad hoc basis as and when requested and we have a list of registered signers that would be used if required.

Applications for housing include information on the forms for requesting alternative languages and formats.

Information

3.21 The Policy for Communications also includes the principle of providing information. We highlight that alternative formats are available on request but have had no requests for alternative formats. Any requests would be considered centrally by Corporate Services who have a monitoring system in place for recording any such requests.

4. Consideration of available data and research

Sources of information

4.1 The following were used in considering available data relevant to the impact of the Access and Communications Policies.

- (a) Internal management information on the profile of tenants and service users
 - (b) 1991 Northern Ireland Census Data
 - (c) Office for National Statistics
 - (d) Northern Ireland Research and Statistics Agency
 - (e) DDA audits
 - (f) NICORE – statistics of all lettings made by the Association
 - (g) Housing Waiting list data
 - (h) Qualitative Feedback from telephonists and reception staff
 - (i) Tenant satisfaction surveys – 8 completed annually
Tenant follow up survey 6 weeks after tenancy commencement
Aids and Adaptations Survey
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Tenant satisfaction survey for Cosy Homes
5% telephone sample for repairs completed
5% personal visit sample for repairs completed

(j) Completed Best Value Reviews

Treasury Management
Risk Management
Neighbour Nuisance
Complaints
Pets
Rent Arrears (current Tenants)

Rent Arrears (past tenants)

Approval of Purchase Invoices
Recruitment & Selection
Review of the provision of financial information to internal users
Voids and Allocations
Equality Scheme
Centre for Social Housing Studies
Life Cycle Costings
Design Brief
Development Service

(j) Complaints register

(k) Statistics on use of language line, interpretation services and provision of alternative information formats

(l) Response to Equality Scheme Consultation by Disability Action

(m) Equality Commission Codes of Practice

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

Profile of Service Users

4.3 Total housing stock as at 31.03.06

	Units	% of stock
Housing with care	41	3%
Supported	70	4%
Sheltered	948	57%
General Needs	495	30%
Category One Elderly	82	5%
Scheme Co-Ordinator	10	1%
Total units	1652	100%

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

4.5 The Association does not house anyone under the age of 16 years due to the restrictions of the common selection scheme. Details below cover only the new lettings from 2005/2006 and have been taken from the NICORE report. We are currently upgrading our IT systems to enable us to provide accurate age profile reports for all tenants.

Total new lettings 193

Age

Age 18 - 24 25 = 13%
Age 25 – 44 56 = 29%
Age 45 – 59 19 = 9.8%
Age 60 Plus 93 = 48.2%

4.6 Marital Status

Married 17 = 8.8%
Unmarried 87 = 45.1%
Divorced 18 = 9.3%
Widowed 57 = 29.5%
Separated 14 = 7.3%

Disability

Yes 59 = 30.6%
No 134 = 69.4

Dependants

Care of a child 72 = 37.3%
Care of a disable person 7 = 3.6%
Care of an Elderly person 1 = 0.5%
No dependant 113 = 58.5%

Gender

Male 54 = 28%
Female 139 = 72%

Ethnic group

White 190 = 98.4%
Irish Traveller 2 = 1.1%
Black Caribbean 1 = 0.5%

Religious Belief

Protestant 83 = 43.2%
Catholic 96 = 50.0%
Mixed 3 = 1.6%
None 6 = 3.1%
Other 4 = 2.1%

4.7 At present, Clanmil does not collect data on political opinion or sexual orientation. The 2004 Northern Ireland Life and Times Survey indicates that 1% of respondents described themselves as gay or lesbian. A research report by Youthnet argues that analysis of the Census 2001 indicates that between 2 and 10% of the population may be lesbian, gay or bisexual.

4.8 According to the 2004 Northern Ireland Life and Times Survey 39% considered themselves to be unionist, 23% stated that they were nationalists whilst 37% stated that they were neither.

Complaints

4.9 No complaints have been received regarding access to Clanmil services or properties.

DDA Audits

4.10 Clanmil have internally trained the maintenance manager to conduct a full range of DDA audits of all our properties, which was concluded in March 2006. Audits were conducted and no non compliance with the legislation issues were raised.

Any issues which were raised were given a priority rating and those that required immediate response have been acted upon. Other areas which are not required by the legislation, but may require consideration as ways of improving the environment for our tenants are being presented to the Management Team in June 2006 with a proposed plan of action for completion.

Tenant Satisfaction Surveys

4.11 During 2005, we had 69 returned tenant satisfaction surveys. None of the surveys indicated any problems with access to properties or staff.

Reason for Customer Contact

4.11 See 3.12

General Accessibility of Staff

4.12 No adverse feedback has been received.

Main Office Accessibility

4.13 The DDA Audit has been completed and actioned for Head Office. We have had a representative from Disability Action screen the building and comment positively on the universal accessibility.

As the building is used by small community groups, we have installed tactile signage, pictorial signage, Braille and a loop system.

We have had recent feedback from a blind user of our training facilities that when asked for her opinion on access of the building, said there was nothing more we could do and facilities were excellent.

We also have a long standing work placement with the Orchardville Society whereby we facilitate work experience on a weekly basis for a wheelchair user and again have had positive feedback on the accessibility issue.

We also have an out of hours service.

Telephone Accessibility

4.14 We are currently reviewing the telecommunications system within Head Office. We have had no adverse feedback on lack of accessibility. We installed a textphone in 2004 and all reception staff have been trained in its use by RNID.

Advice Centres/Local Offices

4.15 No adverse feedback has been received.

Website/E-mail

4.16 No adverse feedback has been received.

Written Correspondence

4.17 No adverse feedback has been received.

Personal Contact

4.18 No adverse feedback has been received.

Information

4.19 No adverse feedback has been received.

5. Assessment of Impact

Disability

People with physical or sensory disabilities are likely to have different needs or have more difficulty accessing services or information. This includes:

- Wheelchair users
 - People with limited mobility
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- Hearing impaired
 - Visually impaired
 - Amputees
 - Those with a mental illness or learning disability
 - People with dyslexia

Clanmil have completed a full DDA audit of all properties and has taken action where necessary to ensure full access to goods and services.

Race

Ethnic minority groups are likely to be adversely affected on the ground that they are less likely to speak English as their first language and may be less able to read information in written form. There may also be cultural issues (open hours).

insert details of any specific information you have on differential impact

None

Dependents

People with dependent may be more likely to be affected by office opening hours. However there is no evidence to indicate any adverse impact in this area. Staff arrange visit after hours and family friendly facilities are provided at the main office, such as changing facilities, educational toys and children welcomed to tenancy meetings, where appropriate.

Although no specific research was available, Clanmil included in the Community Consultation policy a reference to meetings being held outside office hours in the evenings to facilitate those with dependants whose partner was perhaps working and would limit their participation if held during working hours.

Age

There may be some impact on the grounds of age as older people are more likely to have special requirements due to mobility problems, difficulty understanding information, sensory requirements. There is no evidence of adverse impact as facilities are available to ensure equal access e.g. text phone, large print documents, home visits provided on request and, scheme staff to provide a more personal service.

AS part of our design guide, outlined by the Department of Social Development we ensure that our new build programme takes account of the needs of tenants with differing problems. These needs are specifically tailored when building special needs accommodation also.

Sexual orientation

There is no evidence of any adverse impact.

Gender

There is no evidence of any adverse impact.

Religious belief

There is no evidence of any adverse impact.

Political opinion

There is no evidence of any adverse impact.

Marital status

There is no evidence of any adverse impact.

Literacy

Although not directly related to any of the section 75 groups, those with low literacy levels are likely to have greater difficulty in accessing information since much of the information provided by the Association is in the written word.

We are currently reviewing the policy for communication with our scheme housing Irish Traveller families to include added verbal communication of key documents.

6. Mitigating Measures

The following options that could potentially improve our performance in promoting access to services and information:

- **Improved promotion of language line, alternative formats**
 - **Action findings of DDA audits**
 - **Staff training and awareness raising re. Promotion of access to services and information**
 - **Promotion of after hours services**
 - **Looking at providing training for staff as signers or setting up agreement with RNID**
 - **Provision of more information in pictorial form, particularly health and safety information.**
 - **Interpreters, as when requested.**
 - **Ongoing commitment to promoting the Section 75 groups among staff such as annual refresher training, promotion of events such as our recent cross cultural event to celebrate diversity, supported by Belfast City Council.**
 - **Further development of our Access and Communications Policy, to include specific reference to the Irish Travelling Community.**
 - **Develop our housing management IT system to provide accurate information on the 9 Section 75 categories.**
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APPENDIX A

Estimated Populations of Minority Ethnic Communities in Northern Ireland

Source: Multi-Cultural Resource Centre N-I

Community	Numbers	Main Mother Tongue Languages	Main Geographical areas within NI
Chinese ¹	7000- 8000	Cantonese, Mandarin, Hakka, English	Belfast, Craigavon, L'Derry, all NI
Indian ²	1500	Punjabi, Hindi, English, many others	Belfast, Derry and various
African	1600	English, Swahili, Fulani, Xhosa, Arabic, Shona, Yoruba, French	Belfast, Ballymena Co. Antrim
Arabic speaking communities ³	1000- 1500	Arabic, English and many others	Belfast, Craigavon
Irish Travellers	1500	English, Gammon/ Cant/ Shelta.	West Belfast, Derry, Craigavon, Newry
Pakistani Community	700- 1000	Punjabi, Urdu, English others	Greater Belfast Craigavon
Portuguese community	700	Portuguese	Craigavon area, Tyrone, other
Bangladeshi Community	450-500	Sylheti, Bengali	North Down, Ards, Greater Belfast
Filipino community	300-350	Tagalo, English and others	Various
Persian/ Iranian community	300-350	Farsi, English	All NI
Jewish Community	230	English	North Belfast

Other communities (with estimates where available):

- **S&E Asia:** Koreans (100), Japanese (80-100), Vietnamese, Thais, Indonesians, Malaysians (140), Indochina and others, also: Australia & New Zealand
- **Central Asian:** Afghans (20), Kurds, Turkish, former Soviet Republics
- **The Americas:** US citizens, Canadians, Latin Americans (200-250) including Brazil (50), Colombia (35) and others
- **Europeans:** Dutch, French, Albanians (50), Kosovans (80-100), Spanish, Russians (50-100); Polish, Romanians, former Yugoslavia, Italians, Germans, Greeks, and many others

Notes for table:

1. The **Chinese** community includes Hong Kong and the New Territories, Malaysia, Taiwan, Singapore, and Mainland China; the majority originate from Hong Kong and are Cantonese speakers (with some Hakka speakers) for those with written Chinese the traditional form is used; for people from the mainland Mandarin is mainly spoken and the simplified written form used. All are colloquially referred to as "Chinese".

2. The **Indian** community reference here includes around 200-250 members of the Sikh community and people from Sri Lanka;

3. The **Arabic speaking communities** include Jordanians, Palestinians, Lebanese, Syrians, Egyptians, Libyans, Saudis, Iraqis, Moroccans, Algerians and others from North Africa, the Middle East and other areas.