



equality impact assessment report
access & communications



1. INTRODUCTION

Statutory Equality Duties

1.1 Section 75 of the Northern Ireland Act requires **Habinteg Housing Association (Ulster) Ltd**, 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 on 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 **Siobhan Lowery, Housing Quality Officer** (see contact details on page six).

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
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 Habinteg Housing Association (Ulster) Limited

Habinteg Housing Association (Ulster) Ltd. is a registered housing association established in 1976 subject to the provisions of the housing Orders (NI) 1976, 1992 and 2003 and the Industrial and Provident Societies Act (NI) 1969 and 1976. In 1997 Habinteg was successfully assessed as an Investor in People organisation. In 2000, 2003 and 2005 we were successfully reassessed to the standard. In 2000 Habinteg was awarded a Charter Mark for excellence in customer services. We were successfully reassessed to Charter Mark status in 2003.

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:

- the whole range of methods that customers use to contact the association and access its services or information about them.
- 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 groups detailed below.

External;

- tenants;
- residents of supported housing schemes managed by partner agency;
- applicants for housing;
- job applicants;
- general public;
- elected representatives;
- community representatives;
- partners;
- other associations;
- Department for Social Development (DSD);
- Northern Ireland Housing Executive (NIHE);
- other statutory agencies;
- S75 representative groups;
- inspection and assessment bodies;
- suppliers.

Internal;

- Board members;
- Senior Managers;
- staff.

Former;

- past tenants.

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

- Human Resources;
- Housing Management;
- Maintenance;
- Development;
- Allocations;
- Complaints;
- House Sales;
- Care and Support (partner agencies).

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) this 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

3.7 Habinteg Housing Association (Ulster) Ltd. 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;
- 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:

- (a) whilst specific initiatives are in place as part of our commitment to delivering an excellent customer services, Habinteg Housing Association (Ulster) Ltd. has no overall, formal, written access and communications policy. The equality impact assessment presented an opportunity to clearly define and formalise the policy and seek to develop a standardised policy throughout the housing association sector;
- (b) the Association believes that access to services and information is of high importance to S75 groups;
- (c) Habinteg also believes that it's 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;
- (d) the Association provides services to a diverse range of customers including many client groups with special needs;

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- (e) 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 Senior Management team. The policy 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 Management, Housing Management sub-committee, Chief Executive, Deputy Chief Executive, Senior Managers, frontline staff, and Residents' Forum.**

Contact Methods

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

- the main office at **Alex Moira House, 22 Hibernia Street, Holywood, County Down, BT18 9JE** (opening hours 8.45am – 4.45pm Monday to Thursday and 8.45am and 4.30pm Friday);
- the regional office at **Habinteg House, 2 Abercorn Road, Londonderry, BT48 6SA** (opening hours 8.45am – 4.45pm Monday to Thursday and 8.45am and 4.30pm Friday);
- telephone on **028 9042 7211** (Holywood) and **028 7136 0015** (Londonderry) during the hours detailed above;
- facsimile on **028 9042 8069** (Holywood) and **028 7137 3986** (Londonderry);
- e-mail at info@habinteg-ulster.co.uk (Holywood) and derryoffice@habinteg-ulster.co.uk ;
- written correspondence to addresses detailed above;
- website at www.habinteg-ulster.co.uk ;
- local scheme based staff;
- home visits;

Types of Communications

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

- by telephone;
- in writing;
- in-house meetings;
- home visits;
- pre-development public consultation meetings and door to door consultation exercises;
- Residents' groups meetings;
- Housing Officer eight-week scheme surgeries;
- Residents' Forum meetings.

3.13 Examples of information commonly requested by customers are:

- details of new and existing schemes in areas of housing interest;
- internal policies and procedures;
- tenants' handbook;
- waiting list and transfer applications;
- rent payment methods;
- office location;
- Residents News sheet;
- Annual Report;
- Complaints information.

Offices

3.14 In addition to our main and regional offices detailed at 3.11 above, Habinteg has offices on many of its schemes operated by scheme staff. Scheme offices are open to customers daily. Opening hours are displayed in office windows.

Telephone

3.15 In addition to the main telephone lines into each of the offices, as detailed at 3.11 above, and the telephone lines at each of our scheme offices as detailed at 3.14 above, most office based members of staff have a direct dial telephone line connected to a voicemail facility. We operate an out of office hours repairs service facilitated through Fold Telecare and accessible to customers by using a direct dial free phone number. We have also introduced a language line service for customers whose first language is not English.

Website/E-mail

3.16 Our email addresses at info@habinteg-ulster.co.uk and derryoffice@habinteg.co.uk provide customers with a direct email link to each of our main offices and mail at both addresses is picked up by administrative staff at regular intervals every day. Our website at www.habinteg-ulster.co.uk provides visitors with an insight into the Association's work, where offices and schemes are located, how to contact us, downloadable versions of key policies including our Equality Scheme, details of partnership work and useful links to other organisations.

Written Correspondence

3.17 Written documentation including letters to customers and policies are generally composed using 'Arial' font size 14 and are justified. Arrangements for alternative formats can be made directly with the office.

Personal Contact

3.18 Where customers are unable to come to the office for reasons such as transport or unsuitability of hours, officers of the Association will undertake home visits. Scheme based staff are available to do home visits during their hours of duty, except when the scheme office is open to customers, i.e. two hours per day.

Meetings

3.19 Meetings with the general public and the Association's customers are held in accessible venues where possible. Many of Habinteg's schemes have common rooms available for the use of tenants on the scheme and the Association. Common rooms are wheelchair accessible and have accessible kitchen and toilet facilities. Meetings of Habinteg Residents' Forum are held in a location which is half way between Belfast and Londonderry and which is fully wheelchair accessible. Expenses for traveling to and from the meetings of this group are reimbursed. Notices of Residents' Forum meetings are sent to members approximately one month prior to the meeting. All residents on Habinteg schemes are invited the Annual General Meeting of the Residents Forum. Flyers giving details of date, time, location and where applicable guest speaker are prepared and delivered to tenants approximately one month in advance of the meeting.

Translators, Advocates and Signers

3.20 The Association has one member of staff in the main office trained to British Sign Language Stage II standard. We take advice from RNIB on how to produce information for people with visual impairments when this is requested. We also actively seek translation services for customers when a request is received and can advise the customer when the information will be available in the format suitable to them.

Information

3.21 As detailed at 3.17, written information is generally produced in 'Arial' font size 14. We produce information in alternative formats but at present we do not have an 'alternative format' statement on any documents. This situation is kept under review. At present we do not translate any documents as a matter of course as there has not been evidence that there is demand for this service. The situation however is monitored on an ongoing basis. We produce information for customers to specifically meet their needs in terms of font and size when this is requested, and our annual Residents News sheet is produced on audiotape. As detailed in 3.20, translation services are available on request.

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) Northern Ireland Research and Statistics Agency
 - (d) NICORE – statistics of all lettings made by the Association
 - (e) Housing Waiting list data
 - (f) qualitative Feedback from reception staff and those answering the telephone
 - (g) biennial staff surveys
 - (h) Best Value service reviews
 - (i) Complaints register
 - (j) statistics on use of language line, interpretation services and provision of alternative information formats
 - (k) response to Equality Scheme Consultation by Disability Action
 - (l) Equality Commission Codes of Practice

4.2 The external information collected gives the Association an overview on where it stands in relation to the demographics of Northern Ireland. Census figures for Northern Ireland indicate that 20% of the population consider that they have a long-term limiting illness and 16% of the population is of pensionable age. These figures are reflected in our stock / service user profile detailed at 4.3 below. Internal management information on the profile of tenants and service user is collected on an ongoing basis and presented to the Habinteg Board of Management and Housing Management Sub-committee annually. Qualitative data collected by reception staff and all those who answer the telephone is used by the Association to improve and expand services to customers.

Profile of Service Users

4.3 Habinteg has 1331 dwellings in management (as at 10 April 2006), of which 859 (65%) are general family dwellings, 275 (20%) are wheelchair dwellings, 162 (12%) are mobility dwellings and 35 (3%) are sheltered dwellings. Habinteg's integrated housing schemes are located throughout Northern Ireland in:

- Bangor
- Holywood
- Poleglass
- Belfast
- Coleraine
- Enniskillen
- Londonderry
- Strabane
- Newry
- Limavady
- Armagh
- Ballymena
- Lisburn
- Dungannon
- Lisnaskea
- Antrim
- Ballycastle
- Newtownabbey
- Castlerock

4.4 The principal sources of internal equality information about tenants are tenant surveys, NICORE lettings statistics, and internal management information collected to form reports to Committees and Board of Management. Information collected is reported to and monitored by the Housing Management Sub-committee.

4.5 We collect and collate information relating to all new tenancies with the Association. Included in these criteria are the ages of tenants and a breakdown of the ages within the household. Latest figures of new lettings since September 2002 show that 12% of new tenants are of pensionable age, with all other new households being made up of people between the ages of 16 and 59. The Association does not house anyone under the age of 16 years (unless as part of a household) due to the restrictions of the Common Selection Scheme.

4.6 Section 75 Categories

Disability: As stated at 4.3, the Association has 275 units of accommodation which are specifically designed to meet the needs of wheelchair users. Profiles of users are recorded and reported to the Board of Management and in the Business Plan. At 1 April 2006, the number of people with disabilities living in wheelchair accommodation was 308 (some households have more than one person with a disability). The number of people under the age of 18 with a disability was 58, between 18 and 60 there were 197, and over 60 there were 52. The type of disability is also monitored, as is the use of wheelchair accommodation.

During the period 1 April 2003 to 31 March 2006 the Association made lettings to 528 tenants of new or existing dwellings. Profiles of households are monitored internally and through the NICORE system. These households are broken down as follows:

Religion: 369 (70%) households were catholic, 140 (26%) were protestant, 13 (3%) had no religion and 6 (1%) were of religion which is 'other' (one household identified their's to be Buddhist).

Gender: 360 (68%) new tenants were females, while 168 (32%) were males.

Racial Group: 522 (99%) of new tenants were of white ethnic origin and 6(1%) were to ethnic minority groups including Irish traveller, Indian, Pakistan, Chinese (2) and Thai.

Marital Status: Of the 528 new tenancies, 108 (20%) were to people who are single, 296 (56%) were married people, 96 (18%) were to people who are divorced or separated and 28 (6%) were to people who are widowed.

Dependents: Of the 528 lettings made by the Association, 261 were made to households with dependents under the age of 16. There was a total of 413 dependents under the age of 16.

4.7 At present, **Habinteg Housing Association (Ulster) Ltd.** 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 **Habinteg Housing Association (Ulster) Ltd.** has not received any complaints in relation to access from any customers

Disability Discrimination Act (DDA) Audits

4.10 At present Habinteg Housing Association (Ulster) Ltd. does not conduct DDA Audits but consideration is currently being given to the introduction of DDA audits at the Association's premises.

Tenant Satisfaction Surveys

4.11 Housing Officers conduct surveys with tenants on the quality of information provided to tenants. There is no evidence of adverse impact on any of the Section 75 groups in relation to information provided, however the situation is closely monitored. Consideration is currently being given to extending this survey to collect information on tenants' views about accessibility issues.

Reason for Customer Contact

4.12 Habinteg customers contact the office(s) for a range of reasons, including:

- repair reporting
- enquiry about an application / transfer
- enquiry about information received
- request an adaptation
- lodge a complaint
- request information

General Accessibility of Staff

4.13 To date, no issues have been raised in relation to the accessibility of staff. This matter is monitored.

Main Office Accessibility

4.14 To date, no issues have been raised in relation to the accessibility of the main office. This matter is monitored.

Telephone Accessibility

4.15 To date, no issues have been raised in relation to the accessibility of the telephone. This matter is monitored.

Regional Office Accessibility

4.16 To date, no issues have been raised in relation to the regional office. This matter is monitored.

Website/E-mail

4.17 To date, no issues have been raised in relation to the website. This matter is monitored.

Written Correspondence

4.18 To date, no issues have been raised in relation to written correspondence. This matter is monitored.

Personal Contact

4.19 To date, no issues have been raised in relation to personal contact. This matter is monitored.

Information

4.20 To date, no issues have been raised in relation to personal contact. This matter is monitored.

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
- Hearing impaired
- Visually impaired
- Amputees
- Those with a mental illness or learning disability
- People with dyslexia

Habinteg has no evidence of differential impact on people with a disability and those without in accessing services or information.

Race

Ethnic minority groups are likely to be adversely affected on the grounds 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). However, to date there is no evidence that there is an adverse impact on people from different racial groups.

Dependents

People with dependents 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 carry out home visits on request and also arrange visits after hours. Family friendly facilities are provided at the main office.

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. large print documents, home visits provided on request and, scheme staff to provide a more personal service.

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.

6. Mitigating Measures

The Association will give consideration to the following options that could potentially improve our performance in promoting access to services and information:

- Improved promotion of language line, type talk, alternative formats
- Introduction of DDA audits
- Enhanced access to website – *'browesaloud'*, text only, larger print options, alternative languages, accessibility standards – improved colour schemes
- Staff training and awareness raising regarding promotion of access to services and information
- Adjustments to services – promotion of home visits
- Promotion of after hours services
- Use of texting (mobile phones)
- Training more staff as signers or setting up agreement with RNID
- Provision of more information in pictorial form
- Interpreters

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 others
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.