

Habinteg Housing Association (Ulster) Ltd

HOUSING MANAGEMENT

Equality Impact Assessment Consultation Document

July 2007

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1. EXECUTIVE SUMMARY

- 1.1 Habinteg Housing Association (Ulster) Ltd. is committed to fulfilling its responsibilities under Section 75 of the Northern Ireland Act 1998. In its Equality Scheme, the Association gave an undertaking to carry out an Equality Impact Assessment (EQIA) on each policy, or group of related policies, where screening had indicated significant issues in relation to one or more of the nine equality dimensions.
- 1.2 As the representative body for housing associations, the Northern Ireland Federation of Housing Associations (NIFHA) has been assisting its members in the implementation of Section 75 of the Northern Ireland Act 1998 by co-ordinating a joint approach to the equality obligations. Habinteg Housing Association (Ulster) Ltd. is part of this joint exercise which is intended to maximise resources for equality work and to minimise the administrative impact on consultee and/or stakeholder organisations.
- 1.3 The Association screened all of its policies during 2004-05. The results of this exercise, including the proposed EQIA programme, were subject to a 12 week period of public consultation between July and September 2005.
- 1.4 The aim of the Housing Management policy is:

To provide an efficient, effective and equitable housing management service in the interests of the Association, its tenants and the wider community (whilst operating within available resources).

This report provides the following information:

- Background information on the equality duties and Habinteg Housing Association (Ulster) Ltd.
- A description of the Association's current Housing Management policy
- Information on the scope of this review
- The sources of quantitative and qualitative data considered during the review
- Assessment of the impact of the policy on the 9 equality dimensions. This includes potential differential impacts based on disability and race
- Proposed mitigating measures
- Details on the consultation process
- The next stages of the EQIA.

2. INTRODUCTION

Statutory Equality Duties

- 2.1 Section 75 of the Northern Ireland Act requires 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.
- 2.2 The Association must also, in carrying out its functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- 2.3 In line with its equality scheme obligations, the Association screened all of its existing policies to assess whether they impacted on the promotion of equality of opportunity or the duty to promote good relations. The following questions were asked during the screening exercise:
 - Is there any evidence of higher or lower participation 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 Habinteg Housing Association (Ulster) Ltd. (see contact details on page 2).

- 2.4 Following this screening process and the associated consultation, the Association developed a 5 Year Equality Impact Assessment programme. The Housing Management policy was scheduled for assessment in year two of this programme.
- 2.5 This impact assessment has been carried out in accordance with the procedure outlined in the Equality guidance. The eight separate stages of the Equality Impact Assessment are:
 - 1. Determining the aims of the policy
 - 2. Collecting available data
 - 3. Assessing the impact of the policy
 - 4. Consideration of measures to mitigate any adverse impacts and/or alternative policies that might better achieve the promotion of equality of opportunity
 - 5. Formal Consultation

 - 6. Analysis of responses and decision by Association7. Publication of results of the Equality Impact Assessment
 - 8. Ongoing monitoring of adverse impact.
- 2.6 The purpose of conducting the Equality Impact Assessment is as follows:
 - To identify adverse impacts and to consider mitigating factors which will eliminate adverse impact
 - To consider alternative policies which would better promote equality of opportunity.
- 2.7 This document is a draft for consultation and contains details of the first four elements of the Equality Impact Assessment. The remaining stages will be implemented following consideration of consultation responses.

2.8 About <u>Habinteg Housing Association (Ulster) Ltd.</u>

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 and again in 2006.

3. THE POLICY

Description of Policy

The Housing Management policy describes the housing management service the Association provides to its tenants and the wider community.

Policy Aim

3.1 The aim of the Housing Management Policy is:

To provide an efficient, effective and equitable housing management service in the interests of the Association, its tenants and the wider community, whilst operating within available resources.

The scope of the housing management activities covered in the policy include:

- Commencing and terminating tenancies This covers how tenancies are signed up and procedures for ending them.
- Compensation This refers to payments tenants may be entitled to, e.g. redecoration allowances when repairs are carried out.
 Local area services This means how we manage housing
- Local area services This means how we manage housing estates e.g. making sure they are kept clean and safe.
 Manage neighbour nuisance and anti-social behaviour This
- Manage neighbour nuisance and anti-social behaviour This
 covers how we deal with reports of nuisance and anti-social
 behaviour caused by, or affecting our tenants.
- Rent collection and arrears recovery This covers how we collect rent and recover arrears from tenants and past tenant arrears.
- **Tenant participation** This means how we seek to encourage tenants to get involved in planning services and in the management of the Association.
- **Tenancy management** This includes policies in relation to right to succession, sub-letting and lodgers.
- **Void Management** This refers to how we manage empty properties.

Underpinning objectives include:

- Consistency
- Continuous improvement
- Good management

- Maintaining good community relations while delivering excellent customer services
- Providing satisfaction to stakeholders

Scope of Review

3.2 The main stakeholders in relation to the policy include anyone seeking access to the Association's housing management service or any other stakeholder of the Association. This can be any of the following:

External

- Applicants for housing
- Current tenants
- DSD
- Elected representatives
- General public
- Inspection and assessment bodies
- Leaseholders
- NIHE
- Other Housing Associations
- Other statutory agencies
- Partners or providers of Housing Support Services
- Past tenants
- Recognised tenant organisations
- Representatives of the local community
- Residents of agency managed supported housing schemes
- S75 representative groups
- Suppliers

<u>Internal</u>

- Board members
- Management
- Staff

Department for Social Development

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

Inspection and Assessment bodies

There are also other bodies that can look at aspects of the Association's housing management service.

Ombudsman

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

Other Third Parties

There may be occasions to deal with third parties when reviewing the Association's Housing Management policy.

Any organisation providing services on behalf of the Association would be expected to comply with the policies of the Association.

This list is not exhaustive.

What this EQIA does not cover

- 3.3 We anticipate that some aspects of housing management may be considered during all equality impact assessments. Whilst considered to be important housing management functions by the Association, the following areas do not come under the scope of this equality impact assessment:
 - Allocations All Housing Associations are required to allocate properties including transfers in accordance with the rules of the Housing Selection Scheme (HSS). This is the statutory scheme for the management of the social housing waiting list used in the allocation of all social housing. The Housing Selection Scheme is a policy of the Northern Ireland Housing Executive (NIHE) and is approved by the DSD. All social landlords within Northern Ireland must use this scheme to allocate new tenancies. As the statutory authority with ownership of this policy the NIHE have conducted an EQIA on the HSS. NIFHA and the associations participated in this EQIA as consultees. A final report was published in July 2007. For these reasons allocations will not form part of this EQIA exercise.
 - Complaints about Housing Management This was covered by the Year 1 EQIA on Complaints in 2006.

- House Sales This is a statutory scheme owned by the Department for Social Development. In response to their consultation NIFHA submitted a comprehensive reply on behalf of the housing associations.
- Housing Support services This will be covered in a separate EQIA.
- Setting rents and other charges This will be covered in a separate EQIA
- 3.4 The Housing Management policy is intrinsically linked to all of the Association's key policies and processes, depending on the nature of the service. These include:
 - Access and communications
 - Allocations
 - Care and Support
 - Complaints
 - Development
 - Finance
 - Governance
 - House Sales
 - Maintenance

Legislative and Regulatory Requirements

- 3.5 The Association is required to comply with a range of legislative and regulatory requirements. Those listed below are relevant Housing Management service provision:
 - Judgment Enforcement Rules (Northern Ireland) 1981
 - Housing (NI) Order 1983 (introduced the right of Secure Tenant
 - Social Security Claims and Payments Regulations (Northern Ireland) 1987
 - Housing (NI) Order 1992 (This introduced the Tenants Guarantee)
 - Social Security Administration (Northern Ireland) 1992
 - Disability Discrimination Act 1995
 - Section 75 of the Northern Ireland Act 1998
 - DSD Regulatory Framework (2004)
 - Housing Order NI 2003 (Introduced specific powers to tackle Anti-Social Behaviour and introduced Introductory Tenancies, use of injunctions and extended the grounds for possession
 - Housing Benefit Regulations for Northern Ireland 2006

This list is not exhaustive.

3.6 In addition to housing management generally, Habinteg Housing Association (Ulster) Ltd. must also meet certain obligations, under its Equality Scheme, to ensure that complaints made about failure to meet its equality duties are dealt with effectively.

Reasons for Equality Impact Assessment

- 3.7 The screening report gave the following reasons for carrying out an impact assessment on the policy:
 - (a) Whilst there is a Housing Management policy in place, as part of our commitment to delivering an excellent customer service the Equality Impact Assessment presented an opportunity to improve the existing policy and set a more efficient standard throughout the Housing Association sector.
 - (b) The Association believes that access to services, including housing management, is of high importance to S75 groups.
 - (c) Habinteg Housing Association (Ulster) Ltd. also believes that its Housing Management policy merited an equality impact assessment to demonstrate its commitment to providing an efficient and effective service to its tenants. The Association provides services to a diverse range of customers including many client groups with special needs.
 - (d) Due to the absence of available data at the time of screening the policy, the decision was taken to assess actual adverse impacts during the conduct of the equality impact assessment.

Implementation of the policy

3.8 The Housing Management policy has been defined by the Association's management team. It is implemented by all staff throughout the Association. This is the largest team in Habinteg comprising 49 staff members, including, at Senior Management level, the Deputy Chief Executive, two Housing Managers who job share, one Area Manager in the North West Office, and one Maintenance and Asset Manager. We have eight Housing Officers, one Acting Housing Officer, one Assistant Housing Officer, a Housing Quality Officer, a Student Housing Officer and a Maintenance Officer. There are nine staff employed within the team in Administrative / Clerical / Reception roles. The Human Resources Officer is also placed within the Housing Management team. Integral to the Housing

Management team is our Community Assistant role (we have 18) which provides a residential / peripatetic housing management service to the residents on Habinteg's integrated schemes. The team delivers housing management services to customers including rent setting, accounting and arrears recovery; allocation of new and existing dwellings; response, cyclical and planned maintenance; adaptations; resident participation.

Standards

- 3.9 Housing Management Policy documents are agreed by Habinteg Housing Association (Ulster) Ltd. Board and Senior Management Team, in consultation with staff and the resident forums, as required by the DSD and in compliance with any legal requirement.
- 3.11 Habinteg Housing Association (Ulster) Ltd. provides accommodation for people with a variety of housing needs developed in areas where housing need has been identified by the NIHE and (where possible) these homes are built to a lifetime homes standard. As the statutory housing authority the NIHE is responsible for collecting data and identifying housing need and supporting the Association in the delivery of the housing development programme.

Commencing and terminating tenancies

- 3.12 a) Commencement of Tenancy Commencement of tenancy requires new tenants to sign a tenancy agreement before they move into their Habinteg home. Tenancy commencement is always on a Monday. There are two kinds of Habinteg tenancy Introductory and Secure tenancies. During 'the signing' tenants receive a tenant's handbook which provides tenants with details of Habinteg's policies, procedures and services.
 - b) Termination of Tenancy A tenancy may be terminated on a Monday. However the Association requests four clear weeks' notice in writing. Rent continues to be charged until keys are received.
 - c) Evictions can only be carried out in accordance with primary legislation set out in Schedule 3: Housing (NI) Order 1983. Only when the procedure and process are judged to be fair and in accordance with the conditions of tenancy and law, can a possession order be granted by the Court. An eviction is enforced through due

process by the Enforcement of Judgements Office. All associations must follow this process.

Compensation

3.13 Where there may be justifiable grounds for compensation to be paid, the matter will be referred to the Chief Executive for a decision. If the tenant is not satisfied with the response which he/she receives they will be entitled to follow the Associations Complaints Procedure.

Local area services

3.14 The Association has one area office in the North West. In addition several of our schemes have Resident Community Assistants employed by the Housing Association. Housing Officers carry out regular surgeries/scheme visits every 8 weeks. Housing Management is represented on several Community Safety Forums and local area partnerships.

Manage neighbour nuisance and anti-social behaviour

3.15 In order to ensure consistency for all social housing tenants and in accordance with legislation introduced under the Housing (NI) Order 2003 the Department of Social Development issued a model document on policy and procedure to all Housing Associations for dealing with Nuisance and Anti Social Behaviour in order to comply with the legislation. This policy is defined in the legislation.

Rent collection

- 3.16 Rent collection includes:
 - Rent
 - Rates
 - Service charge
 - Support charge
 - Recoverable charges
 - Heating charges (where applicable)

Methods of collection includes: direct debit, housing benefit payment direct, payment cards, standing order, on-line, direct payments by other agencies or cash payments.

Advice and Information on methods of rent payment and prevention is provided together with information and the consequences of non-

payment and recovery action. This information is provided and available to all tenants in the following ways:

- pre-tenancy induction,
- at 6 weekly tenancy counselling
- home visits
- office visits
- arrears letters
- tenant meetings/surgeries
- tenants handbook
- tenancy agreement
- newsletters and other tenant information leaflets
- in annual rent increase letters
- tenants with arrears are encouraged to seek independent advice from a solicitor, the CAB or Independent Advice Centre

Housing staff encourage the uptake of benefits by providing advice information and assistance directly to tenants as and when required and in a format that is easily understood.

Tenants are encouraged to seek advice when in arrears. Staff can provide information on local independent advice centres.

Tenant participation

3.17 Habinteg Housing Association (Ulster) Ltd. is committed to tenant involvement in the operation of its core business. The association provides tenants with the opportunity to help shape and influence housing services and their delivery.

This is set out in the Tenant Participation Policy and is reflected in tenant participation on the Association's Board of Management and sub committees of the organisation.

Tenant participation is facilitated through various forums and in the following ways: one to one communication (for example, by telephone, written correspondence or visits to the office), Housing Officer scheme surgeries (eight weekly), Resident Groups, Associations on schemes, local area partnerships, Residents forum, Housing Management Committee, Board of Management. The democratically elected Habinteg Residents Forum meets four times per year (including one day visiting Habinteg schemes). Resident Forum meetings can be facilitated on Habinteg schemes to encourage greater participation and allowing better and easier

access to tenant groups wishing to attend including facilities for disabled persons.

To encourage greater tenant participation Habinteg Housing Association offers a flexible approach to facilitate tenant involvement including: travel costs or assistance towards childcare costs (this has not been availed of to date), convenient times for meetings at venues and locations that are easily accessible and conform to any DDA requirements.

The Association is committed to tenant consultation and has a strategy in place for tenant consultation.

Habinteg Housing Association (Ulster) Ltd. to date has funded all functions of the Residents Forum. Funding has been provided to residents Groups for facilities on schemes. Training is provided/available to established groups on attracting funding from other sources. Training is encouraged and funded where appropriate.

Tenancy management

- 3.18 Habinteg Housing Association (Ulster) Ltd. is committed to providing an excellent tenancy management service to all our tenants. We recognise the importance of working in partnership with other voluntary, statutory and community organisations to help and assist in the delivery of an efficient and effective tenancy management service. This service is delivered in a number of ways through or by:
 - Local scheme and office based staff
 - Home visits
 - Regular Scheme visits
 - Local surgeries
 - Office visits
 - Focus group meetings
 - Written correspondence (large print where requested)
 - Audio information
 - E-mail
 - Web site

Void Management

3.19 Habinteg Housing Association (Ulster) Ltd. has a voids management policy that is activated if a property becomes void as defined under

the Housing Selection Scheme as 4 weeks. It is worth noting that Habinteg has a low voids rate with housing provision concentrated in areas of high demand. When properties do become void the policy is applied.

The strategy may include the following measures:

- Advertisement
- Maintenance and Redecoration if necessary

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 Housing Management policy:
 - a) Pre-consultation research commissioned by NIFHA and undertaken by IMS Consultants during February – April 2007
 - b) The Association's internal management information on the profile of tenants and service users
 - c) 2001 Northern Ireland Census Data
 - d) Office for National Statistics
 - e) Northern Ireland Research and Statistics Agency data
 - f) NICORE statistics of all lettings made by the Association
 - g) Housing Waiting list data
 - h) Qualitative Feedback from housing management staff
 - i) Habinteg Housing Association's Tenant Satisfaction Surveys
 - j) Habinteg Housing Association's Service Review Surveys
 - k) Complaints register
 - l) Responses received in relation to Associations original Equality Scheme Consultation
 - m) Equality Commission Codes of Practice
- 4.2 The key issues highlighted by analysis of the above data sources are presented in this section.

IMS Pre-consultation Survey

4.3 A Report from IMS Consultants, prepared for NIFHA, providing consultation feedback on equality impact of housing management and maintenance policies dated May 2007 highlighted various issues that may affect various groups within Section 75. The issues raised in relation to the respective S75 groups are detailed below.

Age

The main issues affecting the elderly are:

- Barriers to consultation and involvement travel, caring responsibilities
- Community safety
- Delays in OT assessments need for support

Reported issues affecting young people included:

- Stereotyping of children and young people in relation to definitions of anti-social behaviour
- Lack of understanding of their needs and rights
- Lack of provision of play areas
- The need for greater levels of support to enable young people to sustain their tenancies

Dependents

The following are the main issues affecting people with dependents:

- Allocations policies This is outside the scope of the Year 2 EQIA's
- · Lack of understanding of needs of carers
- Lack of understanding of the rights of children

Disability

The main issues affecting disabled people in relation to housing management and maintenance are:

- Safety harassment, prejudice, social concerns
- · Lack of understanding of needs
- Access to information
- · Understanding of rights and responsibilities
- Understanding of enforcement processes
- Access time carers
- Tenant Participation barriers

Gender

The following issues were identified:

- Safety These concerns related to sex offenders and allocations, which are outside the scope of Year 2 EQIA's. Some comments relate to domestic violence and older women
- Barriers to involvement childcare costs
- Understanding of rights and responsibilities separated, young women

Communications

Marital Status

The main issues reported were:

- · Community safety, particularly in relation to young, single mothers
- Allocation of sex offenders This is outside the scope of the Year 2 EQIA's.

Race

The main issues affecting people from ethnic minority backgrounds in relation to housing management and maintenance policies are:

- Community Safety harassment, prejudice (generally)
- Lack of understanding of needs
- Access to information
- Understanding of rights and responsibilities
- · Understanding of enforcement processes
- Tenant Participation barriers

Religious Belief / Political Opinion

The main issues are:

- House prices
- Housing need Catholic areas
- Mixed housing

These issues are outside the scope of the Year 2 EQIAs, and in some cases the control of the associations e.g. Housing need is assessed by the NI Housing Executive.

Sexual Orientation

The main issues affecting gay, lesbian, bi-sexual and transsexuals in relation to housing management and maintenance policies are:

- Prejudice and fear of harassment or intimidation this was general concern and not specifically related to the service provision
- Stereotyping lack of understanding of needs

Profile of Service Users

- 4.4 Habinteg has 1392 dwellings in management (as at 9 April 2007), of which 922 (65%) are general family dwellings, 274 (20%) are wheelchair dwellings, 161 (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 (North, East and West)
 - Coleraine
 - Enniskillen
 - Londonderry
 - Strabane
 - Newry
 - Limavady
 - Armagh
 - Ballymena
 - Lisburn
 - Dungannon
 - Lisnaskea
 - Antrim
 - Ballycastle
 - Newtownabbey
 - Castlerock
- 4.5 The principal sources of equality information about tenants are tenant surveys and NICORE lettings statistics.
- 4.6 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 18 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 provide a secure tenancy to anyone under the age of 16 years due to the restrictions of the statutory housing selection scheme.

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

4.8 **Section 75 Categories**

Dependents: Of the 528 lettings made by the Association, 372 were made to households with dependents under the age of 16. There was a total of 467 dependents under the age of 16.

Disability: As stated at 4.3, the Association has 274 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 2007, the number of people with disabilities living in wheelchair accommodation was 311 (some households have more than one person with a disability). The number of people under the age of 18 with a disability was 61, between 18 and 60 there were 196, and over 60 there were 54. The type of disability is also monitored, as is the use of wheelchair accommodation.

During the period 1 April 2003 to 31 March 2007 the Association made lettings to 707 tenants of new or existing dwellings. Profiles of households are monitored internally and through the NICORE system. These households are broken down as follows:

Gender: 485 (69%) new tenants were females, while 222 (31%) were males.

Marital Status: Of the 528 new tenancies, 235 (33%) were to people who are single, 314 (44%) were married people, 126 (18%) were to people who are divorced or separated and 32 (5%) were to people who are widowed.

Religion: 503 (71%) households were catholic, 171 (24%) were protestant, 25 (4%) had no religion and 8 (1%) were of religion which is 'other'.

Racial Group: 698 (99%) of new tenants were of white ethnic origin and 9(1%) were to ethnic minority groups including Irish Traveller, Indian, Pakistan, Chinese (2) and Thai.

4.9 At present, Habinteg 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.
- 4.10 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

4.11 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, since 1st April 2006 the Association has received 19 complaints about its Housing Management service that would indicate adverse impact arising from this policy.

Tenant Satisfaction Surveys

4.12 The Association's Customer Satisfaction Surveys invite residents to state if they are satisfied with the Association's standard of service. A new survey system is currently underway and information has not yet been collated. However, most recent figures of customers surveyed indicated that that the Association's service is excellent or good.

Ombudsman Report

4.13 In the period 1st April 2006 to 31st March 2007 there were no complaints raised by the Ombudsman in relation to the Housing Management practices of this association.

Internal Audit

4.14 An Internal Audit Report covering the area of Rent Accounting revealed that the Association has strong controls in this area.

General Feedback

4.15 A Charter Mark Assessment Report dated 19 December 2006 found that the Association's tenants describe the service provided as delivering exactly what is promised to a high standard with caring, helpful and professional staff. Observation of service delivery shows that excellent customer care is in place with tenants being appropriately supported at sign up of tenancy and subsequently in order that their tenancies are appropriately managed.

5. ASSESSMENT OF IMPACT

- 5.1 This section outlines our assessment of the impact of the Association's Housing Management policy on the 9 Section 75 groups based on the evidence considered above.
- 5.2 It has become apparent, following the conduct of this EQIA, that there are very few adverse impacts that are directly related to the Housing Management policy.
- 5.3 Many of the issues raised during the IMS Pre-consultation survey highlighted issues of Access & Communications in relation to services rather than specifically to Housing Management. Access & Communications was addressed as part of the associations' Year 1 EQIAs. As a result the majority of the concerns mentioned by respondents were either covered by the Mitigating Measures proposed at that time or have been identified for action as part of that process.
- 5.4 Other issues reflect general concerns that are outside the scope of this particular EQIA or even the remit of the individual association e.g. healthcare or community safety, house prices. Where relevant associations will raise these matters with the appropriate authority. In addition, NIFHA and/or association representatives participate in a wide range of inter-agency groups aimed at addressing issues such as community safety, housing of sex offenders or the provision of care and support.
- 5.5 Where we indicate that there is no evidence of adverse impact, this does not mean that no action will be taken. The Association is committed to promoting equality of opportunity for all and excellence in customer service, and will seek, where possible, to put measures in place to ensure that all sections of society have an equal opportunity to access appropriate redress when problems occur.

6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following are options that could potentially mitigate adverse impact arising from the Housing Management policies:

- The continued implementation and monitoring the impact of mitigating measures introduced following the Access and Communications EQIA Co-ordination Group
- Action findings of internal/ external audits that are relevant to Housing Management
- · Further development of website
- Ongoing training and awareness for staff and the Board of Management on equality and diversity.
- Local Housing Surgeries to provide better access for all
- New tenancy sign-ups introducing new tenants to resident groups, where these exist and providing useful information
- Adjustments to services further promote the availability of home visits and arrange resident forum meetings at times and in venues and locations that would encourage greater participation
- Further promotion of after hours services
- Extending further the formation of resident groups
- Working with the NIFHA to promote the awareness of Housing Association movement as a major provider of social housing in Northern Ireland
- To further promote the work of Habinteg Housing Association (Ulster) Ltd. within the local communities
- To work in partnership with other Housing Associations to arrange cultural awareness days/activities; invite representatives from groups to attend meeting in a joint approach to raise the profile of Housing Associations and to increase awareness of different groups and the range of their needs
- Promote and support activities that encourage greater understanding, tolerance and respect for Section 75 groups

7. CONSULTATION

- 7.1 Habinteg Housing Association (Ulster) Ltd. has endeavoured to give careful consideration to the measures that might be taken to make the Housing Management policy most efficient, effective and equitable. The measures outlined in section 6 are not intended to be definitive or exhaustive. The Association is planning to formally consult on its findings over a 12 week period and would welcome feedback on these proposals and any other comments that would assist us to improve the policy.
- 7.2 Habinteg Housing Association (Ulster) Ltd. will ensure that it consults effectively with those groups directly affected by its Housing Management policy, and their representatives.
- 7.3 Staff will be available to discuss these proposals in person, by telephone, or by e-mail, as requested. Meetings may also be arranged to discuss the way forward and the Equality Impacts of this document, if required.
- 7.4 The period of consultation will end on 2 November 2007
- 7.5 Comments in relation to this report should be submitted in writing to:

Housing Quality Officer
Habinteg Housing Association (Ulster) Ltd.
Alex Moira House
22 Hibernia Street
Holywood
BT18 9JE

Telephone: 028 9042 7211 Facsimile: 028 9042 8069

email: equality@habinteg-ulster.co.uk

- 7.6 Comments in any other format will also be accepted.
- 7.7 If you require any further information, you may contact the Association using the contact details given in 7.5.

7.8 If you require information about housing associations generally or about the Joint Equality Exercise co-ordinated by NIFHA please contact:

The Northern Ireland Federation of housing Associations 38 Hill Street
Belfast
BT1 2LB

28 028 9023 0446

www.nifha.org

8. NEXT STEPS

- **8.1** Habinteg Housing Association (Ulster) Ltd. will seriously consider all comments received when making a final decision on the recommendations of this EQIA.
- 8.2 The results of the EQIA will be published in the final report, which will be made available to all consultees. Alternative formats will be available on request.
- 8.3 A system will be established to ensure the ongoing monitoring of the impact of the policy on relevant groups.