



**Habinteg** Housing Association (Ulster) Ltd

**HUMAN RESOURCES**

During employment

**EQUALITY IMPACT ASSESSMENT**

**FINAL REPORT  
FEBRUARY 2010**

DRAWN UP IN ACCORDANCE WITH SECTION 75 OF THE NORTHERN IRELAND ACT 1998

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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 existing 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 Human Resources (HR) policies during employment is: To operate procedures, set out in law, best practice and industry standards to:
- ensure effective and efficient management of the association
  - comply with relevant statute
  - and ensure well-being of all staff
- while working to achieve organisational aims, objectives and mission statement

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 HR during employment policy areas
- 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
- Proposed mitigating measures
- Details on the consultation process
- The next stages of the EQIA.

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## 2. INTRODUCTION

### Statutory Equality Duties

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

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

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

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

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issue?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant groups.
- A report describing the results of the screening process is available from 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. HR during employment policies was scheduled for assessment in year four of this programme.

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

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

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

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

2.7 This document is a draft for consultation and contains details of the first four elements of the Equality Impact Assessment. The remaining stages will be implemented following consideration of consultation responses.

## 2.8 **About Habinteg Housing Association [Ulster] Ltd**

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, 2005 and 2009 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, 2006, 2007 and again in 2009. The quality of our standards was further reinforced with the award of the NI Housing Council Jim Speers Award for the 'Best Housing Development in Northern Ireland' for the second year running, for our innovative Ardkeen, South Belfast Scheme.

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### 3. THE POLICY

#### Description of Policy

The HR during employment policies describe the HR service the Association provides to its staff and the wider community.

#### Policy Aim

3.1 The aim of the HR during employment policies is:

To operate procedures as dictated by law, best practice and industry standards to:

- ensure effective and efficient management;
- comply with relevant statute;
- and, ensure well-being of all staff

while working to achieve organisational aims, objectives and mission statement

The scope of the HR activities during employment covered in this policy area include:

- **Employee Relations** – This refers to the interaction of employees with each other or with management. It also covers Trade Union interaction with the associations
- **Terms & Conditions** - This covers the contractual elements of the job
- **Performance Management** – This means the processes the association uses to ensure the objectives of the organisation are achieved
- **Work-Life Balance** – This refers to staff having a measure of control over when, where and how they work
- **Health & Well-being** – This relates to the health and safety of staff

#### Scope of Review

3.2 The main stakeholders in relation to the Human Resources policies that apply during employment are:

##### Internal

- Staff
- Management
- Board Members

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## External

- Applicants for employment and potential recruits
- Department for Social Development (DSD)
- Equality Commission
- Inspection and assessment bodies
- Labour Relations Agency
- Ombudsman\*
- Other Housing Associations / partners or providers of Housing Support Services
- Recruitment Agencies
- S75 representative groups
- Tenants / Residents / Staff
- Trade Union Representatives
- Tribunals office
- Voluntary and community sector

## 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 HR during employment.

## Equality Commission / LRA

The Equality Commission for NI / LRA carry out a compliance role and publish codes of practice to assist business / organisations meet best practice and statutory obligations.

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

The lists at 3.2 are not exhaustive. These lists are in alphabetical order.

## **What this EQIA does not cover**

3.3 We anticipate that some aspects of HR during employment may 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:

- Access & Communications generally as the Year 1 EQIA on this policy dealt with overall issues relating to accessing the association's services (including employment) and communicating with the organisation.



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- Complaints about HR during employment – This was covered by the Year 1 EQIA on Complaints
  - The HR Recruitment and Selection policies and procedures as these were covered in the Year 3 EQIA.
  - The training of Board Members
  - The specific HR policies of joint management partners and recruitment agencies

3.4 The HR during employment policies are intrinsically linked to all of the Association's key policies and processes, depending on the nature of the service.

### **Legislative and Regulatory Requirements**

3.5 The Association is required to comply with a range of legislative and regulatory requirements. Those listed below are relevant to HR during employment service provision:

- The Equal Pay Act (NI) 1970
- The Sex Discrimination (NI) Order 1976
- Health and Safety at Work (NI) Order 1978
- The Rehabilitation of Offenders (NI) Order 1978
- The Rehabilitation of Offenders (Exceptions) Order (NI) 1979 (amended by 1987, 2001 & 2003 Orders)
- The Disability Discrimination Act 1995
- Employment Rights (NI) Order 1996
- The Race Relations (NI) Order 1997
- Part V Police Act 1997
- The Fair Employment and Treatment (NI) Order 1998
- The Human Rights Act 1998
- Section 75 of the Northern Ireland Act 1998
- The Working Time Regulations 1998
- Maternity and Parental Leave etc Regulations 1999
- Sex Discrimination (Gender Reassignment) Regulations (NI) 1999
- Part time Workers (Prevention of Less Favourable Treatment) Regulations (NI) 2000
- Employment Equality (Sexual Orientation) Regulations (NI) 2003
- The Civil Partnership Act 2004
- The Employment Relations (NI) Order 2004
- The Equal Pay (Amendment) Regulations (NI) 2004
- Employment Equality (Sex Discrimination) Regulations (NI) 2005
- Employment (NI) Order 2003 (Dispute Resolution) Regulations (NI) 2005
- Information and Consultation of Employees Regulations (NI) 2005
- The Disability Discrimination (NI) Order 2006
- The Employment Equality (Age) Regulations (NI) 2006

- 
- The Work and Families (NI) Order 2006
  - Safeguarding Vulnerable Groups (NI) Order 2007

This list is not exhaustive.

3.6 In addition to HR during employment 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 HR during employment 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 share best practice across the Housing Association sector.
- (b) The Association believes that access to services, including HR during employment, is of high importance to S75 groups.
- (c) Habinteg also believes that its HR during employment policy merited an equality impact assessment to demonstrate its commitment to providing an efficient and effective service.
- (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.
- (e) The changing nature of this service area means that HR policies are constantly under review and may have altered since the initial screening decision.

### **Implementation of the policy**

All successful candidates are given in their offer of employment pack from the Association all of the Association's HR During employment policies for review prior to signing their offer of contract. The policies are reviewed with all new employees at induction stage with their line manager/HR Officer to answer any queries/ questions that may have arisen from their review. At this point, it is also explained that the Association operates under the Northern Ireland Joint Council for Local Government Services and all employees are shown were to reference the additional principles and key provisions that the Association subscribes to.

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3.8 The HR policies during employment have been defined by Habinteg's Senior Management Team with approval gained from Habinteg Association's Board/relevant committee. They are implemented by relevant staff throughout the Association.

3.9 HR during employment policy documents are developed in compliance with any legal requirement and agreed by Habinteg's Board and Senior Management Team.

3.10 Habinteg Housing Association [Ulster] Ltd carries out the process of policy development in consultation with staff and through negotiation with their representative bodies, where appropriate.

### 3.11 **Employee Relations**

In Habinteg Housing Association [Ulster] Ltd employee relations covers:

- Access NI / Independent Safeguarding Authority
- Attendance
- Bullying and harassment
- Capability (core competency framework for all posts)
- Discipline and grievance
- Staff consultation / briefing
- Trade Unions (optional for staff)
- Code of Conduct (which encompasses areas not covered by the above bullet points e.g. time keeping etc)

### 3.12 **Terms and Conditions**

In Habinteg Housing Association [Ulster] Ltd the contractual elements of the post covered under Terms and Conditions include:

- Equal pay
- Fair retirement procedures (For this reporting period the Association's retirement age set at 68)
- Grading
- Job evaluation
- Leave
- Minimum wage legislation
- Pensions - NILGOSC
- Salaries
- Working time procedures
- Redundancy
- All staff are entitled to monthly travel expenses, including authorised mileage and/or transport reimbursement for travel on Association business
- Essential Car User allowance (for those staff required to provide a vehicle to carry out their duties)

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### 3.13 Performance Management

Delivering quality services requires competent, motivated and committed staff. Performance management is one of the tools Habinteg Housing Association [Ulster] Ltd uses to monitor and the contribution of the individual staff member and to assess whether they are meeting the set objectives. Our performance management policies cover:

- Annual Appraisal April each year (6 month review facilitated October each year)
- Capability (Job description & core competency for all roles within the Association)
- Disciplinary and grievance
- Induction & welcome officer
- Performance improvement plans/targets
- Probation Period (normally 6 months)
- Supervision
- Assigned mentor during induction
- Training – learning and development (on & off the job training)

### 3.14 Work-Life Balance

Habinteg Housing Association [Ulster] Ltd offers a range of options to support the work-life of staff, these include:

- Enhanced sickness absence payments (after completion of probation periods)
- Enhanced Maternity / Paternity arrangements
- Flexi-time working (currently reviewing enhanced credit/deficit periods)
- Job share
- Parental Leave
- Special leave
- Wedding leave (5 days)
- Compassionate leave
- Childcare vouchers facility
- Secondment
- Corporate Social Responsibility/Volunteering opportunities
- Assist employees were possible with responsibilities for children and/or vulnerable dependents
- Ad-hoc home working at the discretion of the line manager
- Half day Christmas shopping leave for all staff members at the discretion of the Chief Executive
- Celebratory lunches are held following successful attainment of quality initiatives and a Christmas lunch as a 'thank you' to all employees.
- Members of staff receiving individual awards (internally – Mary Hollywood Special Staff Award and externally – the Norman Capper award) will be granted a day's leave on their birthday.

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### **3.15 Health and Well-being**

Habinteg Housing Association [Ulster] Ltd aims to ensure the well-being of staff through adherence to health and safety legislation and positive practice in the following areas:

- Control of Substances Hazardous to Health (COSHH)
- Display screen equipment
- Drugs and alcohol
- Essential Car User payment and requirement for business insurance
- Promoting safe mobile phone usage when out of office (Policy currently waiting Board approval)
- AA Car membership (if Essential Car User)
- Infection Precautions e.g. AIDS/advice given on various health/life threatening illnesses/conditions e.g. current swine flu outbreak
- Lone Working
- Manual Handling
- Maternity Risk Assessment
- Occupational Health
- Stress Management with free WPA counselling service for all staff
- Optional WPA Health care scheme
- Smoking Policy
- ICT usage – due to the changing IT environment the current IT policy is under review awaiting Board Approval

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## 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 HR during employment policy:

- a) Targeted pre-consultation meetings with representative bodies held during June – July 2009 as part of the joint exercise co-ordinated by NIFHA
- b) Internal events to assess the impact of HR (during employment) policies held during April – July 2009
- c) A general pre-consultation exercise co-ordinated by NIFHA during July 2009
- d) The Association's internal management information on the profile of applicants and/or job leavers
- e) Monitoring figures for the Association
- f) Data collected for the Annual Regulatory Return to the DSD
- g) 2001 Northern Ireland Census Data
- h) Data from benchmarking exercises
- i) Staff surveys
- j) Qualitative Feedback from staff during employment
- k) Internal and external audits
- l) Complaints and compliments register
- m) Grievances about the association's human resources policies
- n) Information collated for monitoring returns
- o) Equality Commission Codes of Practice
- p) CIPD research
- q) A Unified Guide to Promoting Equal Opportunities in Employment
- r) General feedback to the association
- s) Benchmarking of HR During employment policies with other Housing Associations
- t) Feedback received from Disability Action and the Women's Support Network to promote a positive impact.

The key issues highlighted by analysis of the above data sources are presented in the following sections.

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## Data collection

4.2 Volunteers from NIFHA's Human Resources Forum held targeted preliminary consultation sessions were held with a number of representative organisations. Participants included Age Sector Platform, Carers NI, Coalition on Sexual Orientation, Disability Action, Gingerbread, Multi-cultural Resource Centre and Women's Support Network.

Feedback from these **pre-consultation** meetings with organisations representative of certain Section 75 groups is shown at **Appendix 1**

4.3 Invitations were also made to and apologies received from Age Concern/Help the Aged, the Equality Commission, NICEM, NIACRO

4.4 In addition, NIFHA invited all 142 organisations listed at **Appendix 2** to participate in the **pre-consultation** using the policy documentation available at [www.nifha.org](http://www.nifha.org) or provided in hard copy on request. Interested organisations and individuals were asked to review the policy information and consider the following three issues:

- Do you agree with our assessment of impacts?
- In terms of the group you represent have we missed anything?
- Is there anything we could do to improve this policy for the group you represent?

4.5 Feedback from the pre-consultation meetings with organisations representative of certain Section 75 groups is shown at Appendix 1

4.6 Feedback from Disability Action and Women's Support Network was received following consultation and will be adopted where possible.

## Profile of Employees

4.7 Habinteg Housing Association appointed 20 staff during the April 2008 to April 2009. All relevant monitoring returns were submitted.

4.8 At the submission of this EQIA, Habinteg Housing Association [Ulster] Ltd requests data on all 9 groups under Section 75 in accordance with the guidance from the Equality Commission. The Association notified all employees of its responsibilities under Section 75, advising staff were obliged to complete the gender and community background

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sections but submission of information relation to the remaining categories is voluntary.

- 4.9 100% of the successful applicants recruited within the period April 2008 – April 2009 returned their monitoring form. Of those monitoring forms returned, the following table represents how many successful applicants responded to the following categories:

	% of employees who responded	% of employees who declined to answer/ or didn't complete box
Community Background	100 %	0%
Date of birth	100 %	0%
Dependants	0 %	0%
Disability	100%	0%
Ethnicity	100%	0%
Gender	100 %	0%
Marital Status	100%	0%
Political Opinion	5%	95%
Sexual Orientation	90%	10%
Place of Birth	100%	0%

- 4.10 The Association has amended its monitoring form for applicants in order to gather the same information. The Association will be introducing a new computerised HR system over the upcoming months and all current staff will be asked to review the data held on them under these categories to ensure the information held is accurate and up to date.

## **Staff Surveys**

- 4.11 A staff survey carried out in 2008 showed that 96% of staff agreed or strongly agreed with the statement they felt they had equal access to training and development opportunities relevant to their job. No adverse impact has been identified by staff regarding jobs and promotions made by the Association during the period April 2008 – and the submission of this EQIA.

The age profile of Habinteg Housing Association [Ulster] Ltd employees is analysed on an annual basis. The last exercise which was carried out December 2008 indicated 1.46% of employees were in the over 65 age group. The Association's retirement policy sets the retirement age at 68 and encourages staff who choose to work beyond retirement age (upon



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receipt of a satisfactory medical report indicating that the individual is able to carry out the duties of the post). Currently, 0 employees of the association's workforce is in this category.

## **Complaints/ Grievances relating to HR During employment**

4.12 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, during the last 4 years the Association has received

- no complaints about its HR During Employment policies that would indicate adverse impact arising from these policies

## **Ombudsman Report**

4.13 There have been no complaints submitted to the Ombudsman about Habinteg Housing Association's Human Resources policies that apply during employment.

## **Audit**

4.14 During the review period a continuous ongoing review/audit by the Association's HR Consultant Catherine Williamson have indicated that no corrective action was needed to be carried out on any of the HR During employment policies/procedures other than legislative updates as necessary.

There may be occasions to deal with third parties when reviewing the Association's approach to HR During employment policies and strategies to ensure legislative compliance, best practice and ensure that we are adopting policies to pro-actively contribute to the well-being of all of the Association's staff.

Edwards & Co  
Solicitors  
28 Hill Street  
BELFAST

Catherine Williamson Associates  
HR Consultants  
16 Donegal Square  
BELFAST

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

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## General Feedback

- 4.15 Habinteg Housing Association [Ulster] Ltd has received 0 RQIA reports during 2008-2009 and there were no adverse impacts highlighted.
- 4.16 Habinteg Housing Association [Ulster] Ltd was initially accredited with the Investors in People standard in 2000, thereafter 2003, 2005 and was re-accredited in April 2009.

Comments from John O'Neill, the Assessor, following the Association's April 2009 assessment included:

In summary;

- Habinteg's approach to developing managers and people is rooted in its respect for people and defined core values -- there is full alignment with the vision and purpose'
- Habinteg has many arrangements for involving stakeholders at all levels. Top managers sponsor a very wide range of meetings to ensure that they gather information and input from all directions as to their performance and future requirements. They include, for example, meetings with community assistants three or four times a year and whole staff Away Days every year (residential every second year). They also extend to Resident Forums as well as a full range of Board and other professional inputs.
- In general the company practices equality of opportunity very well and has a good understanding of managing diversity
- managers try to match people's strengths with relevant opportunities or job assignments
- people feel connected with encouragement to share their ideas
- work life balance is fairly well addressed and many people are very appreciative of the flexible working arrangements
- top and other managers try to keep status differences to a minimum and also try to ensure that people get appropriate opportunities to learn and develop, recognising that promotion positions are not always available
- a wide range of good approaches is used to recognise and value people's contributions

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4.17 **Exit interviews (See Appendix 3)** are carried out with all staff when they leave the Association. Standard questions within the exit interview asks if the employee is happy that Habinteg Housing Association [Ulster] Ltd provides equality of opportunity, did they receive sufficient support and guidance and was the training they received relevant and adequate. There were 16 leavers in the period April 2008 to submission of this EQIA in September 2009. There reasons for leaving were as follows

<b>Reason for leaving</b>	<b>Number of Leavers</b>
End of contract	2
Termination of contract	2
Moved to different country	2
Retired	2
Improved salary & Benefits	5
End of Student Placement	3

No adverse impact was identified in the associated exit interviews. One leaver suggested that they felt that the introduction of a career break policy would be beneficial. The Chief Executive is reviewing the feasibility of introducing a policy on career breaks.

4.18 During the period April 2008 to March 2009, the Association received 4 requests for flexible working. Of those 4 requests, all 4 were approved by the Association but only 3 of the employees wished to proceed with their request.

4.19 At the date of submission of this EQIA 1 employee was over the national default retirement age.

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## 5. ASSESSMENT OF IMPACT

- 5.1 This section outlines our assessment of the impact of the Association's HR during employment policy on the 9 Section 75 groups based on the evidence considered above.
- 5.2 The following points outline our preliminary assessment of adverse impacts arising from our HR during employment policies in relation to each of the nine groups.
- 5.3 **Age:** Having reviewed our policies, and the helpful comments from the Age Sector Platform, our initial assessment indicates Habinteg Housing Association's HR policies which apply during employment do not bring significant differential impact in terms of age.
- 5.4 **Dependants:** Our assessment of the available information suggests Habinteg Housing Association's policies do not result in significant differential impact for those with dependants as we offer a range of flexible options for employees. However, we recognise there may be some potential for improvement therefore we have included relevant proposals under mitigating measures (section 6).
- 5.5 **Disability:** Our assessment of impacts did not result in identification of significant differential experiences for disabled people due to Habinteg Housing Association's HR policies during employment. However, our pre-consultation discussions with Disability Action did highlight a number of areas where improvements could be made.
- 5.6 **Gender:** Figures for the year 2006-07 indicate that HAs employed just over 2500 staff. The gender split was 21 % male to 79% female but at senior level this changes to 68% male and 32% female, this was reflected even further at Chief Executive level of the 38 posts at that time only seven were held by females. By early 2009 female Chief Executives represented 15% of the total for housing associations. Currently within Habinteg's current workforce it is comprised of a gender split of 62% female and 38% male. As a result of this information we are exploring measures to mitigate this situation.
- 5.7 **Marital status:** Our research and consultation work have highlighted no significant differential impact in terms of marital status resulting from Habinteg Housing Association's HR policies during employment
- 5.8 **Political opinion:** This has not been statistically measured but no issues have been raised during consultation that indicate Habinteg Housing

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Association's HR policies during employment lead to adverse impact on the grounds of political opinion.

5.9 **Racial Group:** Our research and consultation work suggest Habinteg Housing Association's HR policies during employment do not cause significant adverse impact for those from different racial groups. However, the individual's ability to communicate in English was highlighted by the Multi-Cultural Resource Centre as a significant factor for both employment and career progression.

5.10 **Religious belief:** No issues have been raised during consultations which indicate Habinteg Housing Association's HR policies during employment result in significant differential impact because of religious belief.

5.11 **Sexual orientation:** Our research and consultation work did not highlight any significant differential impacts relating to sexual orientation which resulted from Habinteg Housing Association's HR policies during employment. The Rainbow Project made a number of useful suggestions for improvements.

5.12 Many of the issues raised during pre-consultation highlighted concerns around Access & Communications in relation to services rather than specifically to HR during employment. 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. Nevertheless, this is an important consideration and as such is kept under review so some of the Mitigating Measures listed are intended to improve accessibility.

5.13 Other issues reflect general concerns but are not a specific comment on housing associations. We recognise the validity of some of these comments, especially as many associations were originally formed to tackle adverse impact and are committed to providing high quality services for the whole community.

5.14 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.

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## 6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following options could help mitigate against adverse impact arising from Human Resources policies during employment:

- Full implementation of guidance regarding the extension of monitoring requirements
- Carry out Employee attitude survey
- Undertake further quantitative and qualitative analysis of employees leaving the association and adopt talent management strategies
- Continue to / Offer a range of flexible working options to make posts more suitable for those with caring commitments
- Consider the use of 'Welcome' statements to redress under-representation e.g. men at lower grades women at senior levels if applicable
- Where appropriate continue to / offer support or training to improve competency in English both written and verbal
- Where appropriate continue to / offer support or training to improve computer skills. Especially for the Association's Community Assistants who it is envisaged will have computers rolled out to each scheme after successful completion of the current pilot.
- Periodic review of policies subsequently authorised at Board level
- Ongoing diversity awareness training for all recruitment panel members
- Reflect diversity in the interview panels
- To accommodate applications when they need to be made available in different formats
- Advertise in specific press to encourage disabled applicants
- Disability - keep under review accessibility issues/language/disability etc
- Involve staff for consultation when drafting new policies during employment
- To work towards IIP re-accreditation in 2012
- Proactively take advice from external bodies such as the Labour Relations Agency when drafting or amending policies which may have the ability to be discriminatory
- Promotion of equality issues internally with staff through training events, activities and promotional weeks
- To consider the implementation of a career break policy
- To continue to display domestic violence support helpline numbers within the offices and scheme offices
- To consider the introduction of a textphone facility
- Ad hoc training session on Section 75 and 9 categories for all staff to be incorporated into future training cycles

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## 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 HR during employment policies most efficient, effective and equitable. The measures outlined in section 6 are not intended to be definitive or exhaustive. The Association formally consulted on its findings over a 12 week period and welcomed feedback from Disability Action and Women's Support Network to assist in improving the policy.
- 7.2 Habinteg Housing Association [Ulster] Ltd will ensure that it consults effectively with those groups directly affected by its HR during employment 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 ended on Friday, 18 December 2009
- 7.5 Comments in relation to this report should be submitted in writing to:

**Miss Ann Gallagher**  
**Quality and Performance Manager**  
**Habinteg Housing Association (Ulster) Ltd.**  
**Alex Moira House**  
**22 Hibernia Street**  
**Hollywood BT18 9JE**  
**Telephone: 028 9042 7211**  
**Facsimile: 028 9042 8069**  
**email: [equality@habinteg-ulster.co.uk](mailto: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**  
**T: 028 9023 0446**  
**E: [equality@nifha.org](mailto:equality@nifha.org)**  
**W: [www.nifha.org](http://www.nifha.org)**

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## **8. NEXT STEPS**

- 8.1 Habinteg Housing Association Ulster (Ltd) will seriously consider the comments received from Disability Action and the Women's Support Network.
- 8.2 Alternative formats are available on request.
- 8.3 A system will be established to ensure the ongoing monitoring of the impact of the policy on relevant groups.



## Appendix 1: Consultee comments pre-consultation

Organisation	Summary of comments received	Association's response
<b>Age Sector Platform (ASP)</b>	2006 research shows 9.6% of men aged 65+ in employment and 11% of women aged 60+ in employment – would be interested in profile of staff falling into these categories.	
	Emphasis on choice in terms of retirement – talk of pension age being increased and they would not like to see people forced to work longer. Should be a choice and whether the person is still capable of doing the job.	
	Statistics around people over 50 years old – more likely to still be seeking employment after 2 years than those under 50 years old.	
	Consider the panels used in recruitment – consider panel members over 50 years – sends out a message to applicants – even an observing role.	
	Do associations monitor appointees and current staff in relation to their age?	
	Consider that as people get older, they may like to wind down and get ready for retirement – can they be considered for flexible working requests (albeit here is no legislation on this but in terms of good practice) by considering reduction in hours/phased working.	
	Ageing population – living longer, in better health and growing in size. Need to be aware of what they can contribute.	
	Termination of employment – when people leave, particularly retirement – why not have an information pack for them to include details of support or resources which highlights the range of groups out there which seek to encourage active ageing. Could consider this as part of exit interview – try and support staff the way you would do in a redundancy situation.	

Organisation	Summary of comments received	Association's response
<b>Age Sector Platform (ASP)</b>	Could extend use of packs, not just to those retiring, but in the case of people leaving due to ill health or bereavement etc	
	"Granny leave" – so many people rely on parents for childcare. Impact on employers.	
<b>Carers NI (CNI)</b>	Availability of flexible working is important for carers	
	Access to promotion or other benefits should be the same for those on career breaks or in part-time working – the policy shouldn't depend solely on the manager	
	The two main blocks to carers taking up promotion are: 1. availability of good reliable care services 2. attitude of 1 <sup>st</sup> line manager (need to be trained, aware, positive)	
<b>Disability Action (DA)</b>	Give consideration to the inclusion of a Textphone number within the list of alternative formats for those with a hearing impairment	
	DA commented the alternative formats were likely to suffice in terms of covering the needs of those with disabilities / different races however some of the other groups may have suggestions too	
	'Access & Communications' were not covered by this EQIA. DA commented that whilst this was dealt with previously, these issues were cross cutting within employment matters and would therefore need to be considered again in the employment context	
	'Recruitment & Selection' is not covered by this EQIA. Again DA commented that whilst this was dealt with in year 3, Associations should be reviewing the impact of this exercise. In terms of issues raised and follow up action, organisations which identified a under representation of staff with a disability should now be trying to identify if anything has since changed	

Organisation	Summary of comments received	Association's response
<b>Disability Action (DA)</b>	'Training of Board members/HR policies of Joint Management partners etc' is not covered by this EQIA. DA reminded Associations that current disability legislation protected and promoted the rights of disabled people to participate in public life. Urged Associations to think about which EQIA will cover these specific circumstances if it isn't 'HR in employment'	
	Suggested that the Human Rights Act should be included in list of legislative/regulatory requirements	
	On Performance Management, DA suggested Associations need to thinking about the training which they are providing to staff on disability issues during induction and beyond	
	Under 'sources of information', DA suggested Associations needed to look at their own monitoring figures and ask the following two questions, 1. Are disabled people applying to our organisation? If not, why not? 2. If disabled people are applying, are they successful in securing employment? If not, why not? DA proposed that the Recruitment & Selection EQIA should have identified the need for collating and reviewing this information. DA suggested that if Associations were still not doing this then now was the time to be taking action to redress this.	
	Recruitment processes can impact on 'in employment' issues e.g. under-representation of disabled people can be made worse by strategies on promoting internally or use of the internal trawl	
	In relation to staff surveys DA urged Associations to think about whether their organisation was a 'safe' organisation in which to declare a disability.	

Organisation	Summary of comments received	Association's response
<b>Disability Action (DA)</b>	Do staff feel comfortable sharing this information or do they fear repercussions for security of employment/career development	
	Suggested merit in regularly asking the question on disability, not only at recruitment stage, but throughout employment as this is an issue which can change from year to staff within a staff team.	
	DA suggested staff focus groups could give good feedback on above point and stressed the importance of qualitative as well as quantitative information	
	Following on from this issue of whether people felt safe declaring a disability during employment, DA urged some caution on the figures of complaints. Suggested that no complaints could still signal a problem particularly if the organisational culture meant that staff did not feel that they could raise a complaint or that it would be dealt with appropriately.	
	With regards to using feedback from inspections and accreditation processes for IIP & ISO etc, DA suggested these inspection reports should be reviewed in terms of disability issues raised or recommendations made. Also suggested that associations should review our systems for self assessment, recording actions to be taken and implementing those recommendations.	
	Implementation of. DA reminded Associations that guidance regarding extension of monitoring duties has been out some time and implementation is required to meet the duties under S75.	
	Suggested Associations contact DA's Human Resources Dept with regards to the specific details of proactive HR policies, procedures and initiatives.	

Organisation	Summary of comments received	Association's response
<b>Disability Action (DA)</b>	DA's suggested measures to mitigate against adverse impact. Included: <ol style="list-style-type: none"> <li>1. Use of Supported Employment placements</li> <li>2. Consideration of special schools when school placements are being considered</li> <li>3. Use of a welcoming statement where there is an under-representation of disabled people</li> <li>4. Ensuring disability related hospital appointments/treatment was not recorded as sick leave</li> <li>5. Updating and evaluation of disability awareness training</li> </ol>	
<b>Gingerbread</b>	Would oppose age limits related to applying for flexible working.	
	Concerns about ability of Housing Associations to be flexible in respect of time off during school summer holidays	
	Concerns re: childcare, i.e. access to it, affordability and quality.	
	Noted it can be more economically viable for a lone parent not to be in employment, particularly if they are getting the minimum wage	
	When in employment, lone parents may have to leave due to financial difficulties and go back on benefits	
	Would like to see Flexible Working/Family Friendly policies	
	Would like to see Childcare Initiatives (Gingerbread is aware that whilst childcare vouchers are good idea in theory, they are mainly not in practice due to the lack of childcare on the ground)	
	Be sensitive to domestic violence – skill HR people to sign-post if faced with a disclosure (Woman's Aid)	
	Be sensitive to employees counselling needs during working hours	
	For performance management – each case to be reviewed on an individual basis, taking account of the person's circumstances	

Organisation	Summary of comments received	Association's response
	Ensure employees have access to information on benefit entitlement (lone parents in work are not always fully aware of additional allowances whilst in work)	
	<p>Useful Statistics</p> <ul style="list-style-type: none"> <li>• 25% of families are headed by lone parents</li> <li>• 92,000 lone parent families in N Ireland, incorporating 150,000 children</li> <li>• 90% of lone parents are lone mothers</li> <li>• 56% of lone parents are in work</li> </ul>	
	In the late 90`s government set itself a programme of welfare to work and the target was to have 70% of lone parents in work by 2010. OFMDFM carried out research in respect of how to get a further 14% of lone parents into employment. It was reported that 10,000 jobs would be required and 30,000 childcare places – an impossible target	
<b>Multi-Cultural Resource Centre (MCRC)</b>	The biggest issue for people from another country is often language. Most do not have English; as a result their employment options are limited.	
	Cost of courses may be prohibitive for those in low paid jobs so they cannot improve their language skills which in turn reduces employment / career progression options (e.g. BIFHE course is £106	
	Government needs to offer support by helping people access classes that will enable them to integrate	
<b>Rainbow Project</b>	Review the paternity arrangements to ensure inclusivity. Suggested wording “child in your care”	
	Review the wording in the policy for “maternity” and clarify that it is the main person responsible for providing the childcare	
	Review adoption procedure to ensure inclusive wording	
	Ensure if “marriage” leave is provided it includes Civil Partnerships too.	

Organisation	Summary of comments received	Association's response
<b>Rainbow Project</b>	Issues around allocation of points for housing in intimidation based on sexual orientation	
	Ensure literature is proactive and inclusive language in policies used to promote equality	
	Consider specialised training in issues faced by those of different sexual orientation	
	Look at monitoring key stakeholders in terms of sexual orientation	
	Review Harassment procedure and ensure specific reference is made to "Hate Crimes"	
	Recommendation to draft a Policy for Domestic Violence and include all relationships in this.	
	Ensure Harassment procedures refer to harassment incidents outside the workplace at social gatherings	
	Consider speaking to Lesbian and Gay Older Peoples Network to assess any issues across two of the 9 groups.	
<b>Women's Support Network (WSN)</b>	Suggested promotion flexible working to the male workforce as traditionally women take up most requests.	
	Access to childcare is a big issue for working mothers – no childcare strategy/infrastructure in place.	
	Women may put off having children because of a fear of how it will affect their career, but later encounter fertility issues.	
	Transport infrastructure does not always enable women to manage childcare/work.	
	Future Government changes may force mothers off income support and into work when their children reach 12 years old. Impact of this for women – need retraining and / or re-education as well as somewhere for their children to go.	
	Employers for childcare – voucher scheme to assist parents in work with childcare.	

Organisation	Summary of comments received	Association's response
<b>Women's Support Network</b>	Employers for childcare have also been instrumental in helping employers start up crèche facilities – may wish to consider this as an umbrella group.	
	"gender segregation" within the workplace - where there still might be jobs, particularly lower paid, that would be predominantly female, with no obvious route for progression; suggested that employers should perhaps target these groups with their training programme to provide a chance for development that would allow them to move away from these roles into others with more chance for progression.	



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## Appendix 2 – Equality Consultation List

Revised July 2009

Age Concern Northern Ireland
Age Sector Platform
Alliance Party for Northern Ireland
Amalgamated Engineering & Electrical Union
Amalgamated Transport & General Workers Union
An Munia Tober
Antrim Borough Council
Ards Borough Council
Armagh District Council
Association of Independent Advice Centres
Bahai Council for Northern Ireland
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Barnardos
Belfast City Council
Belfast Health & Social Services Board
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Trade Unions Council
Brainwaves Northern Ireland
British Deaf Association (NI)
Carafriend
Carers Northern Ireland
Carrickfergus Borough Council
Castlereagh Borough Council
Central Services Agency
Chartered Institute of Housing
Child Poverty Action Group (NI)
Children's Law Centre
Chinese Welfare Association
Citizens Advice Regional Office (Belfast)
CO3 Chief Officers Third Sector
Coalition on Sexual Orientation (CoSO)
Coleraine Borough Council
Committee on the Administration of Justice (CAJ)
Community Development & Health Network (NI)
Community Relations Council (CRC)
Cookstown District Council
Council for the Homeless (NI)
Craigavon Borough Council
Democratic Unionist Party
Department for Social Development
Derry City Council
Derry Well Woman
Disability Action, Belfast

Disability Action, Derry
Down District Council
Down's Syndrome Association
Dungannon & South Tyrone District Council
East Belfast Community Development Agency
Eastern Health & Social Services Board
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh District Council
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Help the Aged Northern Ireland
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Larne Borough Council
Lesbian Line
Limavady District Council
Lisburn Borough Council
Magherafelt District Council
Magherafelt Women's Group
MENCAP
Methodist Church in Ireland
Mind Yourself
Moyle District Council
Multi-Cultural Resource Centre
Newtownabbey Borough Council
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
North Down Borough Council
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Care Trust
Northern Health & Social Services Board
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health
Northern Ireland Committee for Refugees & Asylum Seekers (NICRAS)
Northern Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Housing Council
Northern Ireland Housing Executive
Northern Ireland Human Rights Commission (NIHRC)
Northern Ireland Mixed Marriage Association
Northern Ireland Office

Northern Ireland Women's Aid Federation
Northern Ireland Women's European Platform (NIWEP)
Northern Ireland Youth Forum
NUS USI
Office of the First Minister & Deputy First Minister
Omagh District Council
Omagh Women's Area Network
Parents & Professionals & Autism
POBAL
Polish Welfare Association
PRAXIS
Press for Change
Probation Board for Northern Ireland
Progressive Unionist Party
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
SEEDS
Sense NI
Simon Community
Sinn Fein
Social Democratic & Labour Party
Southern Health & Social Care Trust
Southern Health & Social Services Board
Staff Commission for Education & Library Boards
Strabane District Council
Supporting Communities NI
The Cedar Foundation
The Guide Dogs for the Blind Association
The Rainbow Project
The Women's Centre
Traveller Movement Northern Ireland
UCATT
Ulster Democratic Party
Ulster Scots Heritage Council
Ulster Unionist Party
Western Health & Social Care Trust
Western Health & Social Services Board
Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency (WRDA)
Women's Support Network
Workers Party
Youth Action
Youth Council for NI



**HABINTEG**

HOUSING ASSOCIATION  
(ULSTER) LTD

EMPLOYEE RESIGNATION – EXIT INTERVIEW FORM

**Employee Name** .....

**Team** .....

**Leaving Date** .....

**1 EMPLOYMENT HISTORY**

Employment dates:

.....

Starting Position:

.....

Current Position:

.....

Current wage/salary:

.....

Line Manager:

.....

**2 NEW POSITION**

Job Title:

.....

Responsibilities:

.....

Main attraction of new job:

.....

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**3 REASON FOR LEAVING**

- Lack of job satisfaction .....
- Low morale .....
- Location .....
- Travelling distance .....
- Improved terms and conditions .....
- Improved salary and benefits package .....

If other please specify

.....

.....

.....

.....

**4 HOW DID YOU HEAR ABOUT NEW POSITION**

- Agency .....
- Approached by head-hunter .....
- Local Newspaper .....
- National Newspaper .....
- Job Centre .....
- Website .....

If other please specify

.....

.....

.....

.....

**5 REVIEW OF CURRENT POSITION**

a) Likes of current job:

.....

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.....  
.....

b) Dislikes of current job:

.....

.....  
.....

c) Did the job live up to expectations? Yes No

If not, how did it fall short?

.....  
.....  
.....

6 Would you have liked the job to develop in a different direction?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, in what way?

.....  
.....  
.....  
.....

7 Did you get sufficient support and guidance?

Yes \_\_\_\_\_ No \_\_\_\_\_

If not, how was it lacking?

.....  
.....  
.....  
.....

8 Was the training you received relevant and adequate?

Yes \_\_\_\_\_ No \_\_\_\_\_

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What further training do you feel was necessary?

.....  
.....  
.....

9 How was your working relationship with your colleagues?

Good \_\_\_\_\_  
Satisfactory \_\_\_\_\_  
Unsatisfactory \_\_\_\_\_

10 Could your leaving have been avoided?

Yes \_\_\_\_\_ No \_\_\_\_\_

If so, how?

.....  
.....  
.....

11 Do you feel the working environment provided by Habinteg enabled you to conduct your day to day duties in an efficient and effective manner.

Yes \_\_\_\_\_ No \_\_\_\_\_

12 Do you feel that the salary and benefits package offered by Habinteg are as good as those offered by similar organisations.

Yes \_\_\_\_\_ No \_\_\_\_\_

13 Are you happy that the Association provides Equality of Opportunity?

Yes \_\_\_\_\_ No \_\_\_\_\_

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Additional comments:

.....  
.....  
.....  
.....  
.....

Interview carried out by: .....

Signed: .....  
Interviewer

Date: .....

Signed: .....  
Interviewee

**NB: PLEASE ENSURE THAT THE FINANCE OFFICER IS ADVISED OF THE TERMINATION OF EMPLOYMENT DATE.**