

EQUALITY COMMISSION FOR NORTHERN IRELAND
Public Authority 2008 - 2009
Annual Progress Report on Section 75 of the NI Act 1998 and
Section 49A of the Disability Discrimination Order (DDO) 2006

This report template includes a number of self assessment questions regarding implementation of the Section 75 statutory duties from **1 April 2008 to 31 March 2009**. This template also includes a number of questions regarding implementation of Section 49A of the DDO from the **1 April 2008 to 31 March 2009**.

Name of public authority

Northern Ireland Co-ownership Housing

Equality Officer

David McCallum
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Murray Street
Belfast
BT1 6DN

S75 Executive Summary

- What were the key policy/service developments made by the authority during this reporting period to better promote equality of opportunity and good relations and what outcomes were achieved?

In conjunction with the Northern Ireland Federation of Housing Associations (NIFHA) a joint working group on Equality, NICHHA completed a draft EQIA on its Recruitment and Selection policy and submitted same to NIFHA on 30 May 2008. On behalf of all participating housing associations NIFHA placed a notice of public consultation in the Belfast Telegraph and forwarded the draft EQIAs to all our consultees. The consultation period ended on 29 August 2008 and the final draft was produced in December 2008 and submitted to the Equality Commission.

NIFHA collated feedback from consultees received in September 2008 responding to the year 3 impact assessment reports on Human Resources Recruitment and Selection. The organisations that provided feedback were Disability Action, consultation with ECNI representatives and one individual. The Coalition on Sexual orientation (CoSo) had been invited to provide feedback but this did not take place although they previously expressed a wish to remain involved in future consultations. The comments made by consultees were considered by NICHHA and appropriate amendments made following their responses.

Co-Ownership Housing® is now implementing the commitments made in the Impact Assessment ensuring that systems are in place for monitoring purposes. We are currently reviewing the mitigating circumstances and are implementing processes to ensure that systems are in place for future monitoring.

Co-Ownership Housing® reviewed and assessed its monitoring form in accordance with the EC statutory guidelines entitled "Section 75 Monitoring Guidance for Use by Public Authorities". We have introduced a revised edition of the monitoring form.

Co-Ownership Housing® continues to conduct an equality impact assessment in respect of its Human Resources during employment and Charging policies in accordance with our

commitments agreed with the Equality Commission. Members of Co-Ownership Housing's equality team attended awareness training seminars focusing on the Human Resources during employment and Charging Policies equality impact assessments organised by NIFHA and the Equality Commission. This seminar focused on the equality impact assessment process which included determination of policy aim, determining responsibility, consideration of data/research and consideration of adverse impact.

NIFHA are currently producing a final report providing a format and establishing agreed time targets for the various elements of year four.

The Equality Team continues to progress work in relation to its published Disability Action Plan.

The Equality Team has screened the following policies that have not resulted in an EQIA

- *Application Policy - First come, First serve*
 - *Legal Conveyance panel policy*
 - *Appeals policy.*
- *What are the main initiatives planned in the coming year to ensure the authority improves outcomes in terms of equality of opportunity and good relations for individuals from the nine categories covered by Section 75?*

Co-Ownership Housing® will endeavour to continually revise and update its computer system and to collect data for information, research and monitoring purposes in respect of section 75.

Co-Ownership Housing® will continue to review the mitigating circumstances outlined in the previous equality impact assessments on all policies: Access and Communication, Complaints, Housing Management and Recruitment and Selection. Co-Ownership will endeavour to implement actions which demonstrate commitment to Section 75 Equality issues and improve performance.

We continue to seek ways to promote the work of Co-Ownership Housing® within the local communities through Business in the

Community projects and through developing partnerships with other Housing Associations and the voluntary sector.

Following the consultation on the recruitment and selection policies Co-Ownership will continue to review options that may mitigate adverse impact. Co-Ownership has established monitoring systems to capture information on applicants, appointee's, leavers and current staff encompassing all categories within Section 75. This has not been an issue for applicants as there has been no need to recruit during this period.

- Please give examples of changes to policies or practices which have resulted in outcomes. If the change was a result of an EQIA please tick the appropriate box in column 3:

| | Outline change in policy or practice which have resulted in outcomes | Tick if result of EQIA |
|---|--|------------------------|
| Persons of different religious belief | • N/A | |
| Persons of different political opinion | • N/A | |
| Persons of different racial groups | • N/A | |
| Persons of different age | • N/A | |
| Persons with different marital status | • N/A | |
| Persons of different sexual orientation | • N/A | |
| Men and women generally | • N/A | |
| Persons with and without a disability | • N/A | |
| Persons with and without dependants | • N/A | |

Section 1: Strategic Implementation of the Section 75 Duties

- Please outline evidence of progress made in developing and meeting equality and good relations objectives, performance indicators and targets in corporate and annual operating plans during 2008-09

The Northern Ireland Federation of Housing Associations (NIFHA) is the umbrella body of 33 registered and 7 non-registered housing associations in Northern Ireland. Designated housing associations have participated in a joint approach co-ordinated by NIFHA during the development of equality schemes and when implementing their agreed EQIA timetable.

Between April 2008 and March 2009 the Federation provided support for members' participating in the Joint Equality process and this is detailed in Appendix 1.

Section 2: Screening

- Please provide an update of new/proposed/revised policies screened during the year.

| Title of policy subject to screening | Was the <u>F</u>ull Screening Report or the <u>R</u>esult of initial screening issued for consultation? <i>Please enter <u>F</u> or <u>R</u></i> | Was initial screening decision changed following consultation? <u>Y</u>es/<u>N</u>o | Is policy being subject to EQIA? <u>Y</u>es/<u>N</u>o? If yes indicate year for assessment. |
|---|---|--|--|
| Human Resources During Employment | F | N | 2009 |

Section 3: Equality Impact Assessment (EQIA)

- Please provide an update of policies subject to EQIA during 2008-09, stage 7 EQIA monitoring activities and an indicative EQIA timetable for 2009-10

EQIA Timetable – April 2008 - March 2009

| Title of Policy EQIA | EQIA Stage at end March 09 (Steps 1-6) | Outline adjustments to policy intended to benefit individuals, and the relevant Section 75 categories due to be affected. |
|-----------------------------------|---|--|
| Human Resources During Employment | 4 | No adjustments necessary |
| | | |

- Where the EQIA timetable for 2008-09 (as detailed in the previous annual S75 progress report to the Commission) has

not been met, please provide details of the factors responsible for delay and details of the timetable for re-scheduling the EQIA/s in question.

Ongoing EQIA Monitoring Activities April 2008- March 2009

| Title of EQIA subject to Stage 7 monitoring | Indicate if differential impacts previously identified have reduced or increased | Indicate if adverse impacts previously identified have reduced or increased |
|---|--|---|
| Recruitment & Selection | N/A | N/A |
| | | |
| | | |
| | | |
| | | |

2009-10 EQIA Time-table

| Title of EQIAs due to be commenced during April 2009 – March 2010 | Existing or New policy? | Please indicate expected timescale of Decision Making stage i.e. Stage 6 |
|---|-------------------------|--|
| Procurement | Existing | 2010 |
| | | |
| | | |
| | | |
| | | |
| | | |

Section 4: Training

- Please outline training provision during the year associated with the Section 75 Duties/Equality Scheme requirements including types of training provision and conclusions from any training evaluations.

The equality team members have attended the below training events:

1. Sexual Orientation Regulations Guidance, Malone House, Belfast - 8th October 2008.

The guidance was launched by the Commission in a publication entitled, "Eliminating Sexual Orientation Discrimination in NI: A

Guide on the Provision of Goods, Facilities, Services and Premises". The guidance provides practical advice on what the legislation means for service providers, public authorities, religious organisations, providers of education and those managing, selling and letting premises, as well as for society at large.

Colin Flinn helped launch the guidance giving an insightful presentation illustrating his experiences in his many roles within the LGBT sector.

2. Charging Policies seminar with NIFHA - December 2008

This seminar focused on the equality impact assessment process which included determination of policy aim, determining responsibility, consideration of data/research and consideration of adverse impact.

3. Managing S75 workshop with NIFHA – 9th December 2008

The workshop concentrated on developing understanding of S75 tools in relation to policy development and review. It encouraged the consideration of equality issues during stages of policy development and the development of screening policies with consideration of consultation.

4. Joint Equality Exercise with NIFHA – 11th December 2008

The seminar concentrated on the proposals for year 4 EQIA's, the agreement of a timetable for the process as well as the forthcoming changes in Section 75.

5. Equality Commission Annual conference – 12th November 2008

The team tried to secure places for the annual conference but as it was over subscribed we were unable to attend.

6. Age discrimination in the workplace – 26th February 2009

The equality team was keen to attend this course but unfortunately it was fully booked. We have received information on age discrimination from the Equality Commission which details that unlawful age discrimination is and what positive actions we can take against it.

7. Sex equality & flexible working 5th March 2009

We were to attend this seminar but the course was cancelled due to lack of interest.

Section 5: Communication

Please outline how the authority communicated progress on delivery of the Section 75 Duties during the year and evidence of the impact/success of such activities.

Our publications clearly illustrate that they are available in alternative formats on request and the text phone user number is clearly stated.

We have used the 'Equality' page of our website as a tool to communicate our progress and the Equality Scheme, Annual Reviews, Impact Assessments and the Disability Action plan is available to view or download.

Quarterly equality updates are issued to the Governance Committee and Board. The updates are available for all staff.

Co-Ownership provides a home visit service on request to applicants and leaseholders; progress is communicated by our staff, correspondence and literature.

Section 6: Data Collection & Analysis

- Please outline any systems that were established during the year to supplement available statistical and qualitative research or any research undertaken/commissioned to obtain information on the needs and experiences of individuals from the nine categories covered by Section 75.

Co-Ownership Housing® continues to improve personnel software to collect and collate data in relation to the nine categories under section 75 of the Northern Ireland Act. Annual monitoring returns to the Equality Commission are processed electronically.

Co-Ownership Housing's internal database systems have also been upgraded to enable the production of better statistical information. Continual improvement is a priority for 2009/2010.

Co-Ownership identifies applicants accepted to the scheme who come from ethnic minority backgrounds or people who have declared a disability. Visits are arranged to their homes in order to ascertain any mobility or language barriers which may provide difficulties during the duration of the leasehold.

- **Please outline any use of the Commission's Section 75 Monitoring Guide.**

We have found the Commission's Section 75 Monitoring Guide a valuable tool and reference for us regarding our Section 75 duties. It has been used within our team regularly. A summary document was produced by one member of our team that was circulated and discussed at our meetings. The Human Resources department have found the guide useful when considering the mitigating factors from the EQIA and this has resulted in the updating of the monitoring form and circulation to all staff.

Section 7: Information Provision, Access to Information and Services

- Please provide details of any initiatives/steps taken during the year, including take up, to improve access to services including provision of information in accessible formats.

We endeavour to ensure as much as possible that no group will be disadvantaged in respect to access to the Co-Ownership Scheme. We have put in place enhanced processes to enable non English speakers, and the visually and hearing impaired, to gain fair and equal access to information appropriate to their needs.

The Co-Ownership website is speech enabled with BrowseAloud and has now been upgraded to be WAI-AAA compliant with information leaflets, handouts and guidelines available to view and download on the website www.co-ownership.org.

Interpreter and translator facilities are available with Language Line together with Type Talk for text phone users. Sign Language and TextDirect service is also available. Co-Ownership Housing® staff are at ease with these services and recognise the real value

they hold for the individuals who require them as well as themselves. We have had two staff members complete the British Sign Language level 1.

We have used the telephone interpreting service on one occasion this reporting year (Lithuanian).

The suite of literature we publish, Make your Move, Your Next Move and Standards of Service leaflets are available in an additional three languages: Portuguese, Polish and Lithuanian. These are available on our website and we have printed copies available on request.

Posters are displayed in the reception area illustrating the use of Type Talk and Language Line. All reception staff are aware of the various services available and are equipped to handle any queries regarding accessibility effectively.

Section 8: Complaints

- Please identify the number of Section 75 related complaints:
 - received and resolved by the authority (including how this was achieved);
 - which were not resolved to the satisfaction of the complainant;
 - which were referred to the Equality Commission.

No section 75 related complaints were received by Co-Ownership Housing® during the period April 08 to March 09.

Section 9: Consultation and Engagement

- Please provide details of the measures taken to enhance the level of engagement with individuals and representative groups during the year.

In conjunction with the NIFHA, a joint working group on Equality, NICHA completed a draft EQIA on its Recruitment and Selection policy and submitted same to NIFHA on 30 May 2008. On behalf of all 37 participating housing associations NIFHA placed a notice of public consultation in the Belfast Telegraph and forwarded the draft EQIAs to all our consultees. The consultation period ended on 29 August 2008.

NIFHA collated feedback from consultees received in September 2008 responding to the year 3 impact assessment reports on Human Resources Recruitment and Selection. The organisations that provided feedback were Disability Action, consultation with ECNI representatives and one individual. The Coalition on Sexual orientation (CoSo) had been invited to provide feedback but this did not take place although they previously expressed a wish to remain involved in future consultations. The comments made by consultees were considered by NICHHA and appropriate amendments made following their responses.

Co-Ownership Housing® is participating in a collaborative approach to progress work in relation to the EQIA for Human Resources during Employment policies.

Section 10: The Good Relations Duty

Please provide details of additional steps taken to implement or progress the good relations duty during the year. Please indicate any findings or expected outcomes from this work.

Co-Ownership Housing has delivered a housing service against a set of core principles of 'fairness and equity' since its inception in 1978. In developing our Corporate Strategy, objectives and performance indicators are agreed in the context of this core principle and in compliance of section 75.

The Co-Ownership Housing® staff have been encouraged to get involved as part of our commitment to corporate social responsibility and Business in the Community. We took part in the BITC Cares at Christmas appeal in conjunction with St Vincent de Paul and the Salvation Army. Staff members volunteered and raised money to create hampers for those registered in need with St Vincent de Paul in the local community.

We will continue our work with Business in the Community again this year.

- Please outline any use of the Commission's Good Relations Guide.

The commission's good relation guide proved to be a valuable tool for us; it highlighted examples of good relations enabling us to formulate our own plans for 2008/2009.

Section 11: Additional Comments

- Please provide any additional information/comments

As in previous years the main factor against progress is time constraints and conflicting day to day priorities, however Co-Ownership Housing maintains its dedication to the core principles of equality throughout the organisation and is fully committed to its obligations under section 75 Northern Ireland Act.

Annual Report 1 April 2008 / 31 March 2009
'Disability Duties' Questions

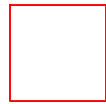
1. How many action measures for this reporting period have been?



Fully
Achieved



Partially
Achieved



Not
Achieved

During the reporting period July 2007/March 2008 Co-Ownership Housing® achieved 11 out of the 15 action measures listed, leaving only 4 partially achieved on our Disability Action Plan. We have detailed those partially achieved in the pages to follow.

2. Please outline the following detail on **all actions that have been fully achieved** in the reporting period.

2 (a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

| Level | Public Life Action Measures | Outputs ¹ | Outcomes / Impact ² |
|-----------------------|---------------------------------|---|---|
| National ³ | | | |
| Regional ⁴ | | | |
| Local ⁵ | Regular attendance at HR forums | New monitoring form produced and circulated | Effective & accurate reporting reflecting the current staff situation |

¹ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

² **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

³ **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments

⁴ **Regional**: Situations where people can influence policy decision making at a middle impact level

⁵ **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local fora.

2(b) What **training action measures** were achieved in this reporting period?

| | Training Action Measures | Outputs | Outcome / Impact |
|---|--------------------------|---------|------------------|
| 1 | N/A | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |

2(c) What Positive attitudes **action measures** in the area of **Communications** were achieved in this reporting period?

| | Communications Action Measures | Outputs | Outcome / Impact |
|---|--------------------------------|---------|------------------|
| 1 | N/A | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |

2 (d) What action measures were achieved to ‘**encourage others**’ to promote the two duties:

| | Encourage others Action Measures | Outputs | Outcome / Impact |
|---|--|---|---|
| 1 | Develop strategies and policies in consultation with disability organisations taking their specific needs into account | Public consultation in line with NIFHA. Responses from <ul style="list-style-type: none"> • Disability Action • ECNI representatives • An individual | Engage disability groups in consultation with Co-Ownership in the development of strategies and policies. |
| 2 | Monitor Disability Equality Scheme | Ongoing Disability | Scheme is implemented on target and updated as appropriate. |

2 (e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:

| | Action Measures fully implemented (other than Training and specific public life measures) | Outputs | Outcomes / Impact |
|---|---|---------|-------------------|
| 1 | N/A | | |

3. Please outline what action measures have been **partly achieved** as follows:

| | Action Measures partly achieved | Milestones ⁶ / Outputs | Outcomes/Impacts | Reasons not fully achieved |
|---|--|--|---|---|
| 1 | Develop, publish and promote Disability Awareness in line with our duties in the Disability Discrimination Act 1995 (as amended by article 5 of the Disability Discrimination (Northern Ireland) Order 2006) | Training provided by in-house equality team. | To meet statutory duty and to promote the disability rights issues to staff and confirm a commitment to the Disability Discrimination (NI) Order in the work place and in our work practices. To promote good practice example within Co-Ownership. | Difficulties in sourcing appropriate training. Financial resources have been allocated to the additional training for the new financial year. |
| 2 | To create a culture of change within Co-Ownership so that staff and board members ensure disability issues are core to all its activities. | Regular meetings of Organisational Equality Group and communication to other staff | Ensure Disability issues are raised at meetings and initiatives are sought and are fully integrated into all | Difficulties in sourcing appropriate training. Financial resources have been allocated to the additional training for the new |

⁶ **Milestones** – Please outline what part progress has been made towards the particular measures; even if full output or outcomes/ impact have not been achieved.

| | | | | |
|---|--|---|---|---|
| | | | aspects of strategy development and procedures. | financial year. |
| 3 | Promote existing work practices that encourage disabled people to apply for vacancies. | In addition to considering the use of welcome statements in our job advertisements we will also consider “how” we can demonstrate that our organisation is a place where everyone is welcome irrespective of any of the 9 categories and specifically in regard to disability to fulfil our commitments under the Disability Action Plan. | Disabled people feel confident when applying for job vacancies at Co-Ownership. | This will be applicable when we have our next recruitment exercise. |

| | | | | |
|---|---|--|---|--|
| 4 | Ensure job vacancies are advertised as appropriate to groups. | The recruitment and selection EQIA final report was completed in Dec 2008. | Increased awareness of job vacancies at Co-Ownership among disabled people. | This will be applicable when we have our next recruitment exercise. We are mindful of the mitigating factors listed in the EQIA For Recruitment & Selection. |
|---|---|--|---|--|

4. Please outline what action measures have not been achieved and the reasons why?

| | Action Measures not met | Reasons |
|---|-------------------------|---------|
| 1 | n/a | |
| 2 | | |
| 3 | | |

5. What **monitoring tools have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?**

(a) Qualitative

N/A

(b) Quantitative

Improvements have been made to the main computing system so that we can now easily identify applicants declaring a disability. The personnel system has also been improved to enable better capturing and reporting of information regarding disabilities.

6. As a result of monitoring progress against actions, has your organisation either:
- made any **revisions** to your plan during the reporting period or
 - taken any **additional steps** to meet the disability duties which were **not outlined in your original** disability action plan / any other changes.

Please delete: Yes / No

If yes please outline below:

| | Revised/Additional Action Measures | Performance Indicator | Timescale |
|---|------------------------------------|-----------------------|-----------|
| 1 | N/A | | |

7. Do you intend to make any further **revisions to your plan** in light of your organisations annual review of the plan? If so, please outline proposed changes?

We have reviewed the plan and feel there are no additional changes to be made.

Appendix 1



Housing Associations' Joint Equality Exercise Annual Progress Report 2008-09

The Northern Ireland Federation of Housing Associations (NIFHA) is the umbrella body for 33 registered and 7 non-registered housing associations in Northern Ireland. NIFHA is not a designated body, but since 2004 the Federation has been assisting members to implement the Statutory Equality Duties. The designated associations have participated in this joint approach co-ordinated by NIFHA throughout the initial development of Equality Schemes and in the roll out of their agreed EQIA timetable.

This joint work has been facilitated by the Federation's Corporate Services Manager and the EQIA Co-ordination Group (ECG) comprised of individuals across the membership. From January 2009 responsibility for steering the joint exercise moved to the Federation's Business Committee. Responsibility for discharging the Statutory Equality and Good Relations Duties within the individual organisation lies with each designated housing association. NIFHA's role is purely a supportive one. The following information outlines the collective work that was carried out with or on behalf of NIFHA's member associations.

General

Between April 2008 and March 2009 the Federation provided support for members participating in the Joint Equality process by:

- Facilitating / providing administrative services for 7 meetings of the ECG
- Issuing 'E Cards' as prompts for action and / or as information updates
- Providing updates on equality & diversity in NIFHA's twice monthly e-News
- Arranging meetings and joint events as appropriate
- Organising training relevant to the associations' equality work
- Co-ordinating all relevant Public Consultation exercises
- Arranging joint Public Notices relating to the designated Housing Associations' equality work
- Acting as a conduit for information and consultee responses
- Managing, maintaining and sharing a Joint Consultee List
- Reflecting the views of members when responding to equality-related consultations undertaken by other organisations
- Liaising with the Equality Commission for Northern Ireland
- Representing the housing association movement through participation in the NI Housing Executive's (NIHE) Consultative Forum on Equality
- Acting as a liaison point for organisations representing Section 75 groups
- Providing support (in the form of information, advice, and templates) to assist designated associations in fulfilling their statutory duties

EQIA Process

Between April 2008 and March 2009 NIFHA co-ordinated joint work on the third and fourth years of our members' collective Equality Impact Assessment (EQIA) timetable. During the reporting period we worked collaboratively with associations to complete the Year 3 EQIAs and begin those scheduled for Year 4. The following table details the Equality Impact Assessments conducted within this time frame.

| Year 3 Equality Impact Assessments | Year 4 Equality Impact Assessments |
|---|---|
| <ul style="list-style-type: none">• Care & Support policies• HR Recruitment & Selection policies | <ul style="list-style-type: none">• Charging policies• HR During Employment policies |

NIFHA's participation in the joint work on the Year 3 EQIA process ended at Stage 6 when the Federation placed public notices announcing the availability of the final reports. All the associations' reports were also made available (on request) by NIFHA in the form of a composite disc. Requests for hard copies or individual reports were referred to and handled by the relevant association.

NIFHA's members commenced Year 4 of the planned EQIA timetable in November 2008. The housing associations' Charging and Human Resources (During Employment) policies were the focus of the reviews. NIFHA facilitated practical events where representatives of all designated associations had the opportunity to review the aims of the policies to be assessed and determine the scope of the Year 4 EQIA work. As a result of these sessions two working groups were formed to develop templates for the Year 4 EQIA reports which would relate to the way housing associations operate.

As in previous years individuals from a range of associations were actively involved in the development of the template documents. The Federation's Corporate Services Manager and members of the two working groups met regularly between February and July 2009 to draft template documents. All designated associations were given the opportunity to comment on the drafts before they were completed. The purpose of the templates was to make cross-sector comparison easier for consultees.

The Equality Co-ordination Group had been disappointed at the quantity and quality of responses received when we commissioned consultants to undertake pre-consultation research in 2008. Those working on the joint project felt this research method had not been successful on this occasion and comments received indicated a lack of knowledge about associations business. Indeed in the 2008 research document the consultants had stated:

"60% of the issues cited under Care and Support and 50% of the issues cited under HR Recruitment and Selection were unrelated to the policies and focused more on concerns outside of the Housing Associations control. This demonstrates clear misunderstanding about the information required from consultees, personal face to face consultations would help eliminate the confusion."

Following discussions with members a more direct approach to research for Year 4 EQIAs was agreed. Volunteers from relevant NIFHA forum groups (Finance and Human Resources) would be delegated to undertake consultation meetings with representatives of various groups representing the nine S75 categories. Feedback from these pre-consultation meetings would inform the impact assessments. The Year 4 EQIAs were only at the research stage at the end of this reporting period.

Training

During 2008-09, the NIFHA training programme included seminars to assist members with equality and diversity such as:

- Managing Section 75 Processes
- Discovering Diversity

Such events were advertised on www.nifha.org and in a mailing to members, so all designated associations had the opportunity to participate. NIFHA also sign-posted members to other suitable training.

In addition to general training NIFHA arranged a practical workshop on conducting Equality Impact Assessments for those who had not previously been involved in this process. In our member support role the Federation also facilitated occasional sessions for individual associations to raise awareness of their equality obligations.

Communications

Throughout 2008-09 NIFHA's Corporate Services Manager continued to act as liaison between the Equality Commission and the designated housing associations. In addition, the Federation acted as the main link between members and those with an interest in promoting equality of opportunity, such as consultee organisations, voluntary groups or statutory bodies. Reported Federation communication output only relates to the joint aspects of our members' work and is intended to complement each individual association's messages about their respective equality and good relations activities.

NIFHA staff answered queries, provided general information about associations and co-ordinated the public engagement element of the joint exercise. The Federation also used regular publications like POSH magazine or Annual Reports and its website (www.nifha.org) to showcase the work members have undertaken to implement equality of opportunity and promote good relations. POSH is issued three times a year and has a print run of 2000 copies. These publications are circulated to a wide range of individuals and organisations including all those on NIFHA's list of consultee organisations and every elected representative in Northern Ireland.

Federation staff actively participate in the events of other organisations, availing of these opportunities to promote the positive contributions our member associations make in a wide variety of areas including equality and diversity.

Data Collection & Analysis

Research commissioned by NIFHA and conducted by IMS (NI) Ltd for the Year 3 EQIAs was detailed in the Annual Report for 2007-08. As indicated in the section on the EQIA Process NIFHA's members decided to take a different approach to this task for the Year 4 EQIAs. The data collection process for the Year 4 EQIAs had only begun as the reporting period ended.

Information Provision; Access to Information and Services

NIFHA itself is not designated under Section 75 but the Federation has maintained its commitment to producing information and publications like our magazine, POSH, in formats that use accessible fonts and type styles. NIFHA also strives to ensure that information provided on www.nifha.org is accessible and takes a positive approach to requests for production of materials in alternative formats.

The Federation regularly provides information and advice for members in relation to translation, interpretation services and producing material in alternative formats. NIFHA also shares any information received about suppliers of these services. This information sharing is aimed at equipping the housing associations to respond promptly to any requests where accessibility may be a factor. How these services are implemented remains the responsibility of the individual association.

Consultation and Engagement

During 2008-09 NIFHA undertook the following consultation and engagement activities as part of our member support work for the Housing Associations' Joint Equality Exercise:

- Conducted regular pre-consultation exercises to ensure that the joint consultee list continued to be accurate, up-to-date and valid
- Co-ordinated the formal consultation on Year 3 of the EQIA programme on behalf of the designated associations by publicising the 12 week consultation period in the three main Northern Ireland daily papers (June 2008)
- Publicised the public consultation for the Year 3 EQIAs on www.nifha.org
- Issued a composite disc containing the draft EQIA Reports of the 32 designated housing associations to 160 consultee organisations in June 2008 (additional discs were also issued on request and to each member)
- Arranged consultation meetings with various organisations representative of the nine equality categories (June – August 2008)
- Collated consultee feedback and circulated all general consultee responses to designated associations (September 2008)
- Collated final reports of Year 3 EQIAs and publicised their availability in the three main Northern Ireland daily papers (December 2008)
- Issued a composite disc containing the associations' final EQIA Reports on request

- Throughout the year NIFHA staff regularly participated in a range of inter-agency groups which enable engagement with 'equalities' organisations – this is in addition to electronic networking and consultation with relevant groups.
- Where appropriate NIFHA has also consulted with members and provided detailed written responses on relevant consultation exercises by other organisations (see additional comments section).

Good Relations Duty

The Federation continued to be an active participant in the Shared Future Housing Advisory Panel, chaired by the NIHE. The panel is made up of representatives from 15 different organisations engaged in the development of a workable strategy for supporting mixed community housing across Northern Ireland. NIFHA is involved in this group in its role as an umbrella organisation while the individual housing associations implement the strategy within the community. During the reporting period the Federation also explored and encouraged the use of the Shared Housing 'brand' in existing housing association developments. To this end the topic of shared neighbourhoods was the focus of a workshop at NIFHA's Annual Conference in November 2008.

The above-mentioned Advisory Panel commented on the implementation of the strategy in relation to:

- The development of new Shared Future housing schemes (Causeway Meadows, Lisburn was opened on 22 January 2009)
- The Phase 2 of the Shared Neighbourhood Programme (involving 10 existing housing areas)
- The Community Relations Council's report on interfaces

In addition, NIFHA maintained its involvement with a variety of inter-agency groups working to foster good relations, such as:

- Community Relations Council
- Supporting Communities Northern Ireland – NIFHA has a place on the Executive Committee of this organisation
- NICVA

Initiating and maintaining such strategic alliances is integral to our work on behalf our membership. The experience gained through these activities enables NIFHA to offer members useful assistance and share best practice thus enhancing the associations approach to the good relations duty. It also allows the Federation to highlight the many excellent contributions of housing associations in this important area of work.

Disability Duties

Once NIFHA's initial work to help members produce Disability Action Plans had been completed responsibility for their implementation was handed over to the individual association.

In more general terms NIFHA undertakes a range of activities which help ensure the action measures of other bodies and/or cross-sector priorities reflect the needs of disabled people. For example, the Federation's Chief Executive participated in a DHSS & PS Working Group set up to develop accommodation standards for persons with learning disability.

Additional Comments

A significant part of NIFHA's engagement on behalf of members during 2008-09 centred on providing a comprehensive response to the Equality Commission's proposed *new Guidance on Implementing Section 75*. The Federation lobbied strongly on behalf of housing associations, through participation in the Commission's consultation workshops and in a detailed written response, to ensure:

- Our Members would not have to produce a new Equality Scheme until 2010;
- Any new process would be in proportion to an association's size;
- Proposed compliance checks should not add to the already heavy burden of regulation to which housing associations are subject; and
- Proposals which would have required public consultation on every single policy would not be implemented.

The Federation was aided in this task by volunteers from within our membership who participated in the Equality Co-ordination Group, internal discussions and working parties as well as at the various consultation meetings held by the Equality Commission. We believe it is worth reiterating these points in our progress report as the final outworking of the Commission's Review of Section 75 has not yet occurred.

We would like to stress that housing associations are positive about and committed to the equality duties but have a genuine concern that the current system is unnecessarily cumbersome, process driven and demanding of significant resources that could be used to effect real improvements in the equality of opportunity / type of relations experienced by many in our society. In particular, we believe that the existing Section 75 processes are based on a "one size fits all" approach which does not facilitate flexibility. Clearly, a small association with housing stock of less than 200 homes does not have the same impact on public services as the Northern Ireland Housing Executive, a government department or a Health Trust. Therefore, we urge the Equality Commission to devise a system which takes account of this disparity while enabling all designated bodies to make a positive difference.

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NIFHA