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Newington Housing Association (1975) Ltd

ACCESS AND COMMUNICATIONS

**Equality Impact Assessment
Consultation Document**

April 2006



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Executive Summary

- 1.1 Newington Housing Association 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 The Association screened all of its policies during 2004 - 05. The results of this exercise, including the proposed EQIA programme, were subject to a 12 week period of public consultation between July and September 2005.
- 1.3 The aim of the Complaints policy is:

To ensure that anyone who is dissatisfied with Housing Association's services can seek redress through an effective, equitable and timely internal complaints review system.

This report provides the following information:

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

Statutory Equality Duties

1.1 Section 75 of the Northern Ireland Act requires Newington Housing Association (1975) Ltd, in carrying out its functions, to have due regard to the need to promote equality of opportunity between:

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

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

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

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

A report describing the results of the screening process is available from Newington Housing Association (1975) Ltd (see contact details on page 6).

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

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

1. Determining the aims of the policy
 2. Collecting available data
 3. Assessing the impact of the policy
-

ures to mitigate any adverse impacts and/or
might better achieve the promotion of equality of

5. Formal Consultation
6. Analysis of responses and decision by Association
7. Publication of results of the Equality Impact Assessment
8. Ongoing monitoring of adverse impact.

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

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

About Newington Housing Association

Newington Housing Association (1975) Limited was established in 1976.

The objectives of the Association shall be:

- A) to carry on for the benefit of the community, the business of providing housing and any associated amenities for persons in necessitous circumstances upon terms appropriate to their means:
- B) to provide for aged persons in need thereof housing and any associated amenities specially designed or adapted to meet the disabilities and requirements of such persons.

The Board of Management of the housing association membership comprises the Chair and 12 other members appointed by the Management Committee. Appointments are made in accordance with the Associations Rules public appointments system and are for a period of 5 years. The housing association reflects a range of interests, representing the interests of users of the service. The current membership has 26 Shareholders.

3.0 The Policy

Description of Policy

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

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

Policy Aim

3.2 The aim of the Access and Communications policy is:

within available resources, and in accordance with best practice, to ensure that there is equality of seeking information or services provided by the Association

Scope of Review

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

External

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

Internal

- Board members
- Management
- Staff

Former

- Past tenants

This list is not exhaustive.

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

- HR
 - Housing Management
 - Maintenance
 - Development
 - Allocations
 - Complaints
 - House Sales
 - Care and Support.
-

issues will be considered during all equality impact
considered to be important by the Association, the
come under the scope of this equality impact

assessment:

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

Legislative and Regulatory Requirements

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

- Disability Discrimination Act
- DSD Regulatory Framework

3.7 Newington Housing Association (1975) Ltd also must meet certain obligations, under its Equality Scheme, to ensure that all current and future customers have ready access to its services and information about them. Specific considerations need to be given to some groups who do not have the same access to information as others. These include:

- Children and young people who may have difficulties in accessing or understanding information;
 - People with sensory and learning disabilities that may have difficulties with information in print;
 - Members of minority ethnic groups, whose first language is not English, and who may have difficulties with information provided only in English.
-

Assessment

the following reasons for carrying out an impact assessment on the policy:

- (g) Whilst specific initiatives are in place as part of our commitment to delivering an excellent customer service, insert name Housing Association has no overall, formal, written access and communications policy. The equality impact assessment presented an opportunity to clearly define and formalize the policy and seek to develop a standardized policy throughout the Housing Association sector
- (h) The Association believes that access to services and information is of high importance to S75 groups
- (i) Newington Housing Association (1975) Ltd also believes that its access and communication policy merited an equality impact assessment because particular groups are likely to have greater difficulty than others in accessing its services or information about them, and access needs are likely to vary amongst the statutory groups
- (j) The Association provides services to a diverse range of customers including many client groups with special needs
- (k) Due to the absence of available data at the time of screening the policy, the decision was taken to assess actual adverse impacts during the conduct of the equality impact assessment

Implementation of the policy

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

Standards

3.10 All methods of access, along with opening times and arrangements for out-of-hours contact, are agreed by **the Management Team and ratified by the Board of Management of Newington Housing Association (1975) Ltd.**

Contact Methods

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

- The main office at 300-302 Limestone Road, Belfast BT15 3AR
 - Telephone
 - E-mail
 - Written correspondence
 - Website
 - Local scheme based staff
 - Home visits
-

3.3. The most common ways in which Newington Housing Association (1975) Ltd communicates with internal and external customers are:

- Telephone
- Written correspondence
- Home visits
- Annual Report
- Mass Mailing

3.12 Examples of information commonly requested by customers are:

- Rent Account Information
- Maintenance Information
- Waiting List Information
- Types and locations of accommodation
- Information on policies i.e Right to Buy, Self Help repairs

Offices

3.13 300-302 Limestone Road, Belfast BT15 3AR

Telephone

3.14 Office 028 90 744055, Fax 028 90 747624, Fold Telecare Out of hours emergencies (Tenants only) 0800 7313081, Language Line 020 8430 3040

Website/E-mail

3.15 www.newingtonha.co.uk (currently under construction)
admin@newingtonha.co.uk

Written Correspondence

3.16 Written correspondence can be provided in large fonts and other formats on request.

Personal Contact

3.17 Home visits can be arranged with staff for tenants with accessibility difficulties upon request.

Meetings

3.18 Newington Housing will send members of staff to public meetings at the request of relevant residence and community groups.

3.19 Newington Housing have a member of staff who has CACDP Stage 2 British Sign Language and members of the public can request his presence with relevant staff members if required.

Information

3.20 Newington Housing Association has received no requests as yet for information or documents to be presented in a different format or language and as we are a small organization will treat each individual request on its merits. A record of all requests of this nature will be maintained by the Association.

4. Consideration of available data and research

Sources of information

- 4.1 The following were used in considering available data relevant to the impact of the Access and Communications Policies.
- (a) Internal management information on the profile of tenants and service users
 - (b) 1991 Northern Ireland Census Data
 - (c) Office for National Statistics
 - (d) Northern Ireland Research and Statistics Agency
 - (e) DDA audits
 - (f) NICORE . statistics of all lettings made by the Association
 - (g) Housing Waiting list data
 - (h) Qualitative Feedback from telephonists and reception staff
 - (i) Tenant Satisfaction Survey 2004
 - (j) Best Value Service Reviews 2001 - 2006
 - (k) Complaints register
 - (l) Statistics on use of language line, interpretation services and provision of alternative information formats
 - (m) Response to Equality Scheme Consultation by Disability Action
 - (n) Equality Commission Codes of Practice
- 4.2 The key issues highlighted by analysis of the above data sources are presented in this section.

Profile of Service Users

Association exclusively operates within the North Belfast area for families, single people and persons aged 60 and over for active elderly accommodation. Due to political instabilities and the number of sectarian interfaces in North Belfast, all Newington Housing Association stock base is in what would be perceived as mainly nationalist areas.

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

4.5 AGE

The age of the head of household of our current tenants are as follows

AGE	NUMBER OF TENANTS
18-24	15
25-44	139
45-59	102
60+	119

The age of waiting list applicants housed by Newington Housing Association in the years April 2004 to March 2006 are as follows

AGE	NUMBER OF TENANTS
18-24	17
25-44	65
45-59	31
60+	28

The Association does not house anyone under the age of 16 years due to the restrictions of the common selection scheme.

4.6 Men and Women Generally

The gender of the head of household of our current tenants is as follows

GENDER	NUMBER OF TENANTS
Male	111
Female	264

The gender of waiting list applicants housed by Newington Housing Association in the years April 2003 to March 2006 is as follows

GENDER	NUMBER OF TENANTS
Male	56
Female	129

4.7 Disability

Newington Housing Association has 59 current tenants with a disability, as defined by the Disability Discrimination Act.

Newington Housing Association has housed 15 applicants from the Common Waiting List with a disability in the years April 2003 to March 2006.

4.8 Persons with dependants

Newington Housing Association has 170 current tenants with one or more dependants.

Newington Housing Association housed 109 applicants from the Common Waiting List with one or more dependants.

4.9 Marital Status

Data has been collected since April 2003 and up to March 2006 the number of applicants housed from the Common Waiting List are as follows

MARITAL STATUS	NUMBER OF TENANTS
Married	18
Single	105
Divorced/Separated	39
Widowed	21

4.10 Religious Belief

Newington Housing Association did not collect data on the religious belief of its tenants until April 2003. Of the applicants housed from the Common Waiting list since then 181 have been Catholics, 3 Protestant and 1 of no religious belief.

4.11 Racial Group

All 375 current tenants of Newington Housing Association are white. All 185 applicants housed from the Common Waiting List from April 2003 to March 2006 were white.

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

Northern Ireland Life and Times Survey 39%
be unionist, 23% stated that they were nationalists
whilst 37% stated that they were neither.

Complaints

4.14 Newington Housing Association has received no complaints regarding access to information or services to date.

DDA Audits

4.15 No DDA audits have been carried out to date. However, Newington Housing Association is considering DDA requirements and has recently employed a member of staff with experience in this area.

Tenant Satisfaction Surveys

4.16 Newington Housing Association carried out a Tenant Satisfaction Survey in October 2004. 60% of respondents preferred method of contact was via telephone whilst the other 40% preferred to personally call to our offices. 20% of respondents felt that a member of staff was helpful, with 75% responding that a member of staff was very helpful. No issues were raised by tenants concerning the access arrangements to either the office or staff.

Reason for Customer Contact

- 4.17 The main reasons customers would contact Newington Housing Association are:
- To report a repair
 - To access information concerning the rent account
 - To request information on accommodation
 - To request information on housing application
 - Information on policies
 - General advice and housing issues
 - Complaints of Anti Social Behaviour

General Accessibility of Staff

4.18 As in 4.15 tenants are happy with the accessibility of staff

Main Office Accessibility

4.19 See 4.15

Telephone Accessibility

4.20 See 4.15

Information would receive a very small number of email contacts from customers. Our website is currently under construction.

Written Correspondence

4.22 No feedback available. See 3.20

Personal Contact

4.23 See 4.15

Information

4.24 See 3.20

5. Assessment of Impact

Disability

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

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

Customers have raised no specific adverse impact, but staff discussions have raised a number of factors that may adversely impact on disabled customers and stakeholders. Signage in our office may be difficult for people who are visually impaired, although we have wheelchair access to the office the counter is at a high level albeit all interview rooms are on the ground floor. Newington Housing Association has no text phone in its office and this may cause a adverse impact for customers/stakeholder who are or become hearing impaired.

Race

Ethnic minority groups are likely to be adversely affected on the ground that they are less likely to speak English as their first language and may be less able to read information in written form.

As stated in 3.20 we have had no requests for information to be provided in different languages and the impending introduction of Language Line in our office should mitigate any adverse impact encountered.



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Dependents

People with dependent may be more likely to be affected by office opening hours. However there is no evidence to indicate any adverse impact in this area. Staff arrange visits and appointments at times that a suitable to the customer.

Age

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

Sexual orientation

There is no evidence of any adverse impact.

Gender

There is no evidence of any adverse impact.

Religious belief

There is no evidence of any adverse impact.

Political opinion

There is no evidence of any adverse impact.

Marital status

There is no evidence of any adverse impact.

Literacy

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



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potentially improve our performance in promoting access to services and information:

- **Promotion of language line when implemented, alternative formats and introduction of text phone.**
 - **Consider carrying out and implementing findings of DDA audits**
 - **Better signage for the visually impaired, lowering part of reception counter for wheelchair users.**
 - **Improved partnership with advocacy groups**
 - **Enhanced access to website when construction complete**
 - **Staff training and awareness raising re. Promotion of access to services and information**
 - **Adjustments to services – promotion of home visits**
 - **Promotion of after hours services (Fold Telecare)**
 - **Use of texting (mobile phones)**
 - **Provision of more information in pictorial form**
-

Minority Ethnic Communities in Northern Ireland

Source: Multi-Cultural Resource Centre N-I

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

Other communities (with estimates where available):

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

Notes for table:

1. The **Chinese** community includes Hong Kong and the New Territories, Malaysia, Taiwan, Singapore, and Mainland China; the majority originate from Hong Kong and are Cantonese speakers (with some Hakka speakers) for those with written Chinese the traditional form is used; for people from the mainland Mandarin is mainly spoken and the simplified written form used. All are colloquially referred to as "Chinese".
2. The **Indian** community reference here includes around 200-250 members of the Sikh community and people from Sri Lanka;
3. The **Arabic speaking communities** include Jordanians, Palestinians, Lebanese, Syrians, Egyptians, Libyans, Saudis, Iraqis, Moroccans, Algerians and others from North Africa, the Middle East and other areas.