

**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**. Please enter information at the relevant part of each section and ensure that it is submitted electronically (by completing this template) and in hardcopy, with a signed cover letter from the Chief Executive or, in his/her absence, the Deputy Chief Executive to the Commission by **31 August 2009**.

In completing this template it is essential to focus on the application of Section 75 and Section 49. This involves progressing the commitments in your equality scheme or disability action plan which should lead to outcomes and impacts in terms of measurable improvement for individuals from the equality categories. Such outcomes and impacts may include changes in public policy, in service provision and/or in any of the areas within your functional remit.

Name of public authority (Enter details below)

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Equality Officer (Enter name and contact details below)

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## **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?

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For the period 1 April 2008 – 31 March 2009 a number of policy and service developments have been ongoing to promote equality of opportunity and good relations.

The Association's Business Improvement Manager continues with her responsibility for Section 75 as well as promotion of the Association and its work.

The Association's Annual Report was published in line with the RNIB Clear Print guidelines for the 3<sup>rd</sup> year. Tenants are also kept informed of policy changes and revisions via the tenants newsletter which was published 3 times in the past year. A report on how the Association performed against its service standards was produced for tenants information and also published on the Association's website.

Tenants and customers are made aware that all documents can be made available in alternative formats if requested and the Association has a contract with a translation service (Language Line) who provide translation and interpretation if required.

Once again this year the Association has participated in the joint process in conjunction with NIFHA on the timetable for EQIA's. EQIA's for this reporting period are:

### **Year 4 Charging Policies & HR During Employment Policies**

The Association's Business Improvement Manager was a member of the working group tasked with drawing up a template for the Year 4 EQIA on Charging Policies. At the end of this reporting period the Year 4 EQIA's were only at the research stage.

- 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?

Connswater Homes is committed to improving outcomes from its work in connection with the nine categories and as such has been looking at a number of ways of continuing to do this.

The Association continues to review the lessons learned and feedback from Years 1, 2 & 3 of the five year timetable issued with the original Equality Scheme.

The work is co-ordinated and the Business Improvement Manager actively promotes all aspects of equality as a core element of her role. All aspects of the Association’s business adhere to and are inclusive towards all nine categories covered by Section 75.

The Business Improvement Manager attends and will continue to attend seminars and training organised by the Equality Commission for NI, as stand alone training or in conjunction with events and seminars organised with NIFHA, to keep up-to-date and aware of any changes in legislation and requirements that the Association must be aware of.

The Association’s Disability Action Plan is an integral part of the corporate governance that the Association adheres to and is there to ensure compliance and further improve outcomes in terms of equality of opportunity in all areas.

Connswater Homes recognises the need to encourage its tenants to be involved in aspects of the Association’s work and has in the past year continued to promote any opportunity to promote the establishment of a Tenant’s Forum.

Connswater Homes is committed to continuing its contribution towards inclusiveness in all areas of its work.

- 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	<ul style="list-style-type: none"> <li>• None</li> </ul>	

Persons of different political opinion	• None	
Persons of different racial groups	• None	
Persons of different age	• None	
Persons with different marital status	• None	
Persons of different sexual orientation	• None	
Men and women generally	• None	
Persons with and without a disability	• None	
Persons with and without dependants	• None	

### **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

This report has been approved by the Chief Executive and will be ratified by the Board of Management at its meeting on 16 September 2009.

EQIA's for Care & Support policies and HR Recruitment & Selection policies were the two policy areas priorities for EQIA in Year 3 and concluded in this reporting period. Year 4 EQIA's on Charging Policies and HR During Employment were scheduled to begin in this reporting period. Connswater Homes did not have to complete Care & Support policies as it does not have any housing provision in these categories. Details of progress in all other policies are included in Section 3.

Connswater Homes has the equality agenda firmly fixed within its corporate plan with the five year timetable being used as a guide to maintain momentum.

Connswater Homes continues to have a member of staff available at training sessions provided through NIFHA and the ECNI in order to

progress work timetabled. All staff are then updated on a regular basis through staff meetings.

NIFHA provided an EQIA workshop session for all associations involved in the joint process which was attended by the Business Improvement Officer.

As the Association goes into year 5 of the 5 year timetable the following priorities will be progressed:

- To complete EQIA's for Housing Associations Charging Policies and HR During Employment.
- To review feedback from the consultation process on HR Recruitment & Selection policies
- To enhance the Business Improvement Manager's skills and knowledge in connection with Section 75 and Disability Discrimination legislation.

**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.
none			

### 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

<b>Title of Policy EQIA</b>	<b>EQIA Stage at end March 09 (Steps 1-6)</b>	<b>Outline adjustments to policy intended to benefit individuals, and the relevant Section 75 categories due to be affected.</b>
Charging policies	3 – research	
HR During Employment	3 – research	

- 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.

N/A

#### Ongoing EQIA Monitoring Activities April 2008- March 2009

<b>Title of EQIA subject to Stage 7 monitoring</b>	<b>Indicate if differential impacts previously identified have reduced or increased</b>	<b>Indicate if adverse impacts previously identified have reduced or increased</b>
HR Recruitment & Selection	Reduced	Reduced

#### 2009-10 EQIA Time-table

<b>Title of EQIAs due to be commenced during April 2009 – March 2010</b>	<b>Existing or New policy?</b>	<b>Please indicate expected timescale of Decision Making stage i.e. Stage 6</b>
Procurement	New	Originally screened for this period, though due to changes in the operating environment is now under review

#### **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.

Connswater Homes Business Improvement Manager attends training sessions on equality and during the past year has attended the following courses / seminars in connection with the Section 75 process:

- Review of Section 75 Public Consultation Event in September 2008
- Equality of Opportunity & Sustainable Development in Public Sector Procurement in October 2008
- Work Life Balance in November 2008
- EQIA Workshop on Association's Charging Policies Year 4 in November 2008
- Managing S75 Processes in December 2008
- EQIA Year 4 scoping workshop in December 2008

Other seminars / events on equality attended by the Business Improvement Manager were:

- ECNI Conference on Human Rights in September 2008

The Business Improvement Manager updates all staff on equality issues and provides in-house training as required.

All courses attended by Association staff are followed up by the completion of an evaluation sheet giving feedback in terms of training received in connection with Section 75.

#### **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.

The Association produces all its documents and correspondence adhering to the RNIB Clear Print Guidelines and ensures that all tenants and customers know that information can be made available in a range and variety of formats and languages on request.

The Annual Report contains an update on progress in relation to the equality duties. Tenants newsletters and the Association's website gives

details of how to obtain information in other formats. The Association's newsletter gives policy updates throughout the year and reports on performance show how the Association is carrying out its business.

### **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.

The Association carried out year two of a Tenants Satisfaction Survey in Summer 2008, the results from this have been reported on to the Board of Management and to tenants. This completes a 100% survey of all tenants during a two year period.

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

None

### **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.

The Association continues to use Language Line to provide information in other formats as required.

The Association's office provides:

- At least one access point to the building is level access.
- The reception desk has a lowered section.
- Interview room situated on the ground floor
- Training Room/Board Room situated on the ground floor which is wheelchair accessible.
- Wheelchair accessible lift to all floors of the building.
- Disabled toilets on ground floor
- Disabled parking
- Induction loop system

The association holds contact details for the Royal National Institute for the Deaf to provide signing services and the office benefits from a loop system installed to cater for those with impaired hearing.

Any written correspondence from the Association will be made available in large print and other formats upon request including Braille and audio.

The Association's website provides information on Association services and gives users the opportunity to download forms and documents and contact the Association to request information and book repairs etc.

### **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.

During 2008– 09 the Association received 1(one) formal complaint which was not related to Section 75. All complaints received by the Association are dealt with through the Association's complaints policy and procedure.

To date the Association has not received any complaints in connection with Section 75. Any complaint that is received would be dealt with in the normal way using the Association's complaints policy and procedure to ensure consistency.

### **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.

Connswater Homes continues to try and generate enough interest to establish a tenants forum, unfortunately in this reporting period the Association has had a nil response to all proposals. The Association is committed to progressing this exercise until a forum can be established that the tenants can take ownership of and then it can become a useful means for consultation with tenants and also for tenant participation within the organisation.

The Association continues to use its website to provide news updates for tenants, advertise any job opportunities and host documents and information relating to all aspects of the Association's business areas.

As previously mentioned the Association works jointly with NIFHA on formal consultation and this work has proved invaluable in terms of ensuring consistency and making consultation meaningful. The work conducted by NIFHA on behalf of housing associations is attached as Appendix 1 to this report.

### **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.

The Association continues to actively promote its commitment to all aspects of Section 75 and the equality agenda in Northern Ireland.

Partnership working with other housing associations has ensured that economies of scale have been achieved in relation to maintenance and repair work which are now in Year 3 of a Measured Term Contract in conjunction with three other housing associations.

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

### **Section 11: Additional Comments**

- Please provide any additional information/comments

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

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

2

Fully  
Achieved

Partially  
Achieved

1

Not  
Achieved

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 <sup>1</sup>	Outcomes / Impact <sup>2</sup>
National <sup>3</sup>			
Regional <sup>4</sup>			
Local <sup>5</sup>			

<sup>1</sup> **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.

<sup>2</sup> **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.

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

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

<sup>5</sup> **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			
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	Reports & items on Disability Awareness and Equality issues in Newsletters and website	Ongoing communication and information with regard to the Association’s business areas	Promotion of the Association’s commitment to ensure equality of opportunity and service provision to all.

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

	Encourage others Action Measures	Outputs	Outcome / Impact
1			
2			
3			
4			

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	Adaptations made for tenants with disabilities	10 tenants had physical adaptations made to their homes	Ease of use or access to facilities within tenants home to make living conditions more accessible

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

	Action Measures partly achieved	Milestones <sup>6</sup> / Outputs	Outcomes/Impacts	Reasons not fully achieved
1				
2				
3				
4				

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

	Action Measures not met	Reasons
1	Establishing a tenants forum	No interest from tenants
2		
3		

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

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

Survey of tenants who have had adaptation work carried out recorded for their comments on the quality of the workmanship and their satisfaction

(b) Quantitative

Number of adaptations carried out for tenants to improve facilities in their homes and give better access and ease of use recorded

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.

No

If yes please outline below:

	Revised/Additional Action Measures	Performance Indicator	Timescale
1			
2			
3			
4			
5			

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?

No



### 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"> <li>• Care &amp; Support policies</li> <li>• HR Recruitment &amp; Selection policies</li> </ul>	<ul style="list-style-type: none"> <li>• Charging policies</li> <li>• HR During Employment policies</li> </ul>

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](http://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](http://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](http://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](http://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.

**Lucinda McMurrin**

Corporate Services Manager

NIFHA

5 August 2009