



Triangle Housing Association Ltd

**HUMAN RESOURCES
Recruitment and Selection**

Equality Impact Assessment

Final Report

December 2008

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Appendix A: List of Organisations that received draft EQIA disk June 2008

Appendix B

Recruitment & Selection Procedure

1. EXECUTIVE SUMMARY

- 1.1 Triangle 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 As the representative body for housing associations, the Northern Ireland Federation of Housing Associations (NIFHA) has been assisting its members in the implementation of Section 75 of the Northern Ireland Act 1998 by co-ordinating a joint approach to the equality obligations. Triangle Housing Association is part of this joint exercise which is intended to maximise resources for equality work and to minimise the administrative impact on consultee and/or stakeholder organisations.
- 1.3 The Association screened all of its policies during 2004-05. The results of this exercise, including the proposed EQIA programme, were subject to a 12 week period of public consultation between July and September 2005.
- 1.4 The aim of the Human Resources (HR) recruitment and Selection policy is:

To identify a suitable pool of candidates to meet the needs of the business (whilst operating within available resources).

This report provides the following information:

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

2. INTRODUCTION

Statutory Equality Duties

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

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

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

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

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

A report describing the results of the screening process is available from Alan Crilly (see contact details on page 2).

2.4 Following this screening process and the associated consultation, the Association developed a 5 Year Equality Impact Assessment programme. The HR Recruitment and Selection policy was scheduled for assessment in year three of this programme.

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

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

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

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

2.7 A draft document was published for consultation and contained details of the first four elements of the Equality Impact Assessment. The remaining stages will be implemented following the publication of consultation responses.

2.8 **About Triangle Housing Association**

Triangle Housing Association was established in November 1977. The Association is registered with the Department for Social Development. It is a Limited company under the Industrial and Provident Societies Act and has charitable status with the HMRC. Triangle's mission is to "Deliver quality housing and appropriate support to people in need, promoting equality and opportunity for all". Triangle employs over 220 staff in housing, direct care & support, administrative, technical and management roles throughout a range of projects and initiatives across the province. Its corporate objectives are:

- To secure and effectively manage financial resources
- To deliver quality housing and support services meeting stakeholder expectations
- To resource the Association with a skilled Board and staff
- To effectively manage the association's internal processes.

3. **THE POLICY**

Description of Policy

The HR Recruitment and Selection policy describes the Recruitment and Selection service the Association provides to its tenants and the wider community.

Policy Aim

3.1 The aim of the HR Recruitment and Selection Policy is:

To identify a suitable pool of candidates to meet the needs of the business whilst operating within available resources.

The scope of the HR Recruitment and Selection activities covered in the policy include:

- Job analysis – This means the process of identifying the need for a post
- Job Description and Person specification – This refers to assessing the requirements of the post and the competencies required for the post
- Advertising – This refers to the use of appropriate advertising methods and media when recruiting
- Selection process – This covers panel composition, shortlisting, interview procedures and testing
- Monitoring - This means complying with legal obligations in relation to collecting relevant statistical information about applications for employment
- Vetting and checking – This covers reference checks, criminal records checks by Access NI, medical checks, Permit to Work, Qualification checks and relevant external bodies, where appropriate

Underpinning objectives include:

- Compliance with legislation, statutory codes of practice and internal policies
- Meeting the resource needs of the business

Scope of Review

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

External

- Access NI
- Applicants for employment and potential recruits
- Department for Social Development (DSD)
- Elected representatives
- Equality Commission
- General public
- Inspection and assessment bodies
- Legislative Bodies
- Northern Ireland Housing Executive (NIHE)
- Other Housing Associations
- Other statutory agencies
- Partners or providers of Housing Support Services
- Recruitment Agencies
- S75 representative groups
- Tenants and Residents
- Trade Union Representatives

Internal

- Board members
- Management
- Staff

Department for Social Development

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

Inspection and Assessment bodies

There are also other bodies that can look at aspects of the Association's HR Recruitment and Selection service.

- Labour Relations Agency
- Registration & Quality Inspection Authority
- Tribunals Office

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- Equality Commission NI

Ombudsman

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

Other Third Parties

There may be occasions to deal with third parties when reviewing the Association's HR Recruitment and Selection policy.

The lists shown under 3.2 are not exhaustive. These lists are in alphabetical order.

What this EQIA does not cover

- 3.3 We anticipated that some aspects of HR Recruitment and Selection may be considered during all equality impact assessments. Whilst considered to be important by the Association, the following areas did not come under the scope of this equality impact assessment:
- Access & Communications generally as the Year 1 EQIA on this policy dealt with overall issues relating to accessing the association's services (including employment) and communicating with the organisation.
 - Complaints about HR Recruitment and Selection – This was covered by the Year 1 EQIA on Complaints
 - The policies and procedures during employment – this will be covered in the EQIA in Year 4.
 - The recruitment of Board Members
 - The specific recruitment and selection policies of joint management partners and recruitment agencies
- 3.4 The HR Recruitment and Selection policy is intrinsically linked to all of the Association's key policies and processes, depending on the nature of the service.

Legislative and Regulatory Requirements

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

- The Equal Pay Act (NI) 1970
- The Sex Discrimination (NI) Order 1976
- The Rehabilitation of Offenders (NI) Order 1978
- The Rehabilitation of Offenders (Exceptions) Order (NI) 1979 (amended by 1987, 2001 & 2003 Orders)
- The Disability Discrimination Act 1995
- Employment Rights (NI) Order 1996
- The Race Relations (NI) Order 1997
- The Fair Employment and Treatment (NI) Order 1998
- Section 75 of the Northern Ireland Act 1998
- The Employment Equality (Sexual Orientation) Regulations (NI) 2003
- The Civil Partnership Act 2004
- The Equal Pay (Amendment) Regulations (NI) 2004
- The Employment Equality (Sex Discrimination) Regulations (NI) 2005
- The Disability Discrimination (NI) Order 2006
- The Employment Equality (Age) Regulations (NI) 2006
- Safeguarding Vulnerable Groups (NI) Order 2007
- Part V Police Act

This list is not exhaustive.

3.6 In addition to HR Recruitment and Selection generally, Triangle must also meet certain obligations, under its Equality Scheme, to ensure that complaints made about failure to meet its equality duties are dealt with effectively.

Reasons for Equality Impact Assessment

3.7 The screening report gave the following reasons for carrying out an impact assessment on the policy:

- (a) Whilst there is a HR Recruitment and Selection policy in place, as part of our commitment to delivering an excellent customer service the Equality Impact Assessment presented an opportunity to improve the existing policy and share best practice across the Housing Association sector.

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- (b) The Association believes that access to services, including HR Recruitment and Selection, is of high importance to S75 groups.
 - (c) Triangle also believes that its HR Recruitment and Selection policy merited an equality impact assessment to demonstrate its commitment to providing an efficient and effective service.
 - (d) Due to the absence of available data at the time of screening the policy, the decision was taken to assess actual adverse impacts during the conduct of the equality impact assessment.

Implementation of the policy

3.8 The HR Recruitment and Selection policy has been defined by the Association's Board and / or management team. It is implemented by relevant staff throughout the Association.

Standards

3.9 HR Recruitment and Selection Policy documents are developed in compliance with any legal requirement and agreed by Triangle's Board and Senior Management Team.

3.10 Triangle Housing Association carries out the process of recruitment and selection in accordance with the Statutory Codes of Practice, set out by the Equality Commission and the Labour Relations Agency.

3.11 Job analysis

Jobs are planned through annual resource planning, staffing budgets, turnover of staff, natural wastage, as a possible outcome of a flexible working request or on a project basis. Triangle has a structured job evaluation process to identify appropriate terms and conditions and ensure consistency.

3.12 Job Description and Person Specification

Job descriptions and person specifications are reviewed and if necessary, updated for all vacancies, as required. Skills and abilities are determined by the requirements of the post and benchmarked across the sector.

Consideration is given to the relevance of criteria required and account will be taken of equivalent standards.

3.13 Advertising

The type of advertising used by Triangle Housing Association depends on the nature of the post and the circumstances of the job.

Consideration is given to accessibility of advertising methods for the widest pool of applicants within budgetary constraints. This includes screening adverts for negative or discriminatory language or imagery.

3.14 Selection process

This includes panel composition, shortlisting, interview procedures and testing.

Where available, panels will be constituted with due regard to a representative panel for recruitment exercises including service users/tenant involvement where appropriate. The same panel will be used throughout the recruitment process.

Tests applied during the recruitment process for certain posts are screened to ensure they are non-discriminatory and relevant to the job and criteria required for the post.

3.15 Monitoring of recruitment and selection process

All registered employers must monitor their workforce by community or background, by gender, by Standard Occupational Classification, applicants, appointees, promotees and job leavers.

Applicants, appointees, promotees and job leavers monitoring returns will form the basis of Triangle's annual monitoring return to the Equality Commission.

3.16 Vetting and checking

In Triangle Housing Association this procedure includes reference checks, criminal records checks, medical checks, Qualification checks, checks on entitlement to work in the UK and relevant external bodies, where appropriate. References and medical clearance will be taken up for all posts.

All applicants for designated posts will be referred to the relevant statutory bodies, which may include criminal records checks (through Access NI), Regulation and Quality Improvement Authority checks,

Northern Ireland Social Care Council checks, Home Office checks, Nursing and Midwifery Council and qualification equivalencies checks.

There are specific procedures for each vetting and checking process. These are largely determined by other statutory agencies or specific insurance requirements.

4. CONSIDERATION OF AVAILABLE DATA AND RESEARCH

Sources of information

- 4.1 The following were used in considering available data relevant to the impact of the HR Recruitment and Selection policy:
- a) Pre-consultation research commissioned by NIFHA and undertaken by IMS Consultants during March – April 2008
 - b) Internal data collection events held as part of the joint exercise co-ordinated by NIFHA
 - c) The Association's internal management information on the profile of applicants and/or job leavers
 - d) Data collected for the Annual Regulatory Return to the DSD
 - e) 2001 Northern Ireland Census Data
 - f) Office for National Statistics
 - g) Northern Ireland Research and Statistics Agency data
 - h) Data from benchmarking exercises
 - i) Staff surveys
 - j) Qualitative Feedback from HR Recruitment and Selection staff
 - k) Triangle Housing Association's Best Value Service Reviews
 - l) Internal and external audits
 - m) Complaints and compliments register
 - n) Grievances about the association's Recruitment & Selection process
 - o) Information collated for monitoring returns
 - p) Equality Commission Codes of Practice
 - q) CIPD research
 - r) General feedback to the association

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

IMS Pre-consultation Survey

- 4.2 A Report from IMS Consultants, prepared for NIFHA's EQIA Co-ordination Group (ECG), providing consultation feedback on the impact of Care and Support and Human Resource policies dated April 2008 highlighted various issues that may affect the groups within the Section 75 categories. The full report, which includes responses from the ECG, is available. The issues raised in relation to the respective S75 groups are detailed below.

Internal Data collection events

4.3 Housing associations held two meetings during November 2007 where a range of staff undertook an assessment of the impact of both the Care and Support and the Human Resources – Recruitment and Selection policies.

The Feedback collected at those events has also been taken into account and when considering the impact of these policies.

The table shown below summarises the outcomes of the work detailed at 4.2 and 4.3.

Key issues highlighted for each of the nine Section 75 categories

S75 Category	Source of data	Issues highlighted
Age	IMS pre-consultation survey	Consultees considered there was a general bias against employing older people Consultees highlighted the fact that specifying timed experience can exclude some younger people
	Housing association meetings in Nov 2007	Legislation may require a person to be over 18 or 21 for certain jobs. Insurance (e.g. for drivers) may be difficult to get at certain ages which would restrict the employer's options
Dependents	IMS pre-consultation survey	No issues were cited by consultees
	Housing association meetings in Nov 2007	The need to have 24 hour provision in certain Care or Support services may cause adverse impact for some people with dependents – for example, providing night cover or having to work anti-social hours may be problematic for those with dependents The availability of flexible working practices can help to reduce adverse impact for staff with dependents Family friendly policies could help

S75 Category	Source of data	Issues highlighted
Disability	IMS pre-consultation survey	Employers will fill quota as regards disabled employees but are not pro-active in employing from this group * Access to documentation and information in different formats or from different sources Difficulty in gaining suitable job experience faced by those with disabilities * Need to consider people with mental health issues * Limited opportunity for high level jobs * Disabled people are under represented in employment * * seemed to be general comments rather than about associations
	Housing association meetings in Nov 2007	Staff suggested there was potential for adverse impact in application processes Staff highlighted access issues generally and the need to make reasonable adjustments as key concerns for anyone with a disability Staff were also conscious that the nature of certain jobs had the potential to limit their suitability for some people with a physical disability
Gender	IMS pre-consultation survey	Limited choices for men at senior level
	Housing association meetings in Nov 2007	Staff noted that it was characteristic of the social care sector to have a higher proportion of females in the workforce although this is not the case for senior positions. Recruitment of staff at different starting salaries for same post, with the potential for claims under 'Equal Pay' especially where it affects those who have broken career experience (e.g. females having a family) or who are unaware of the potential to negotiate their starting salary as there tends to be greater awareness among males
Marital status	IMS pre-consultation survey	Application / monitoring forms should have sufficient boxes to allow someone to record a civil partnership
	Housing association meetings in Nov 2007	The main point highlighted was the impact of having to work on a rota system ie for those employed in care or support work

S75 Category	Source of data	Issues highlighted
Political opinion	IMS pre-consultation survey	Consultees cited no issues
	Housing association meetings in Nov 2007	For those with convictions resulting from political activities the association should consider the context e.g. how long ago, nature of offence and impact on job / client group
Racial Group	IMS pre-consultation survey	Highlighted racism in employment (generally) i.e. employer pick 'local person if presented with 2 similar CVs Availability of documentation / information in appropriate languages People from such groups can only achieve basic levels due to communications issues
	Housing association meetings in Nov 2007	Ensure that processes used do not exclude people whose first language is not English Identified criminal records checks as an area where Migrant Workers were treated differently i.e. often checking is not possible – this may cause adverse impact for UK applicants Need to ensure educational equivalencies can be assessed to avoid causing adverse impact
Religious belief	IMS pre-consultation survey	Ensure suitable pool of candidates take 'Civil Service' like approach to recruitment and recruit internally
	Housing association meetings in Nov 2007	Increase understanding through training for Managers on differing religious beliefs and/or practices Many associations offer 24 hour services which may impact on employees' ability to practice their religion Consider things like holy days when arranging interviews
Sexual orientation	IMS pre-consultation survey	Consultees made general comments indicating that there are prejudices against this group within employment, seen and unseen and that there is discrimination due to sexual orientation.
	Housing association meetings in Nov 2007	No issues were raised in this area but participants in the events recognised that lack of monitoring in this area could make it more difficult to determine if there was adverse impact

Profile of Applicants for employment

- 4.4 The Association currently has appointed 56 staff during the period April 2007-March 2008. All relevant monitoring returns were submitted.
- 4.5 In 2007 Triangle reviewed it's monitoring system which monitors all equality groups except data on political opinion. Triangle Housing Association will add this category to it's monitoring form in light of the guidance issued by the Equality Commission.
- 4.6 A research report by Youthnet argues that analysis of the Census 2001 indicates that between 2 and 10% of the population may be lesbian, gay or bisexual.
- 4.7 Research from the Belfast Islamic Centre in 2007 estimates circa 6,000 residents who are Muslim as opposed to 1,943 cited in the 2001 census.

Complaints

- 4.8 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, during the last 3 years the Association has received no complaints about its Recruitment and Selection policies that would indicate adverse impact arising from these policies.

Staff Surveys

- 4.9 The Association's staff surveys collect statistical information on job satisfaction; communication; leadership; training; career development; health & safety and well being; corporate social responsibility; supervision & appraisal; work life balance; equality of treatment of staff; consultation with staff and shared common goals.

The results of our surveys are used for the annual business planning process and developing our human resources strategies. Our most recent surveys showed high levels of overall satisfaction.

Ombudsman Report

- 4.10 There have been no complaints raised with the Ombudsman in relation to the HR Recruitment and Selection practices of this association.

Internal Audit

4.11 Regular reviews by Internal Auditors on Recruitment and Selection highlight no adverse impact in relation to the employment practices pre employment within Triangle Housing Association.

General Feedback

A best value service review was conducted on People Processes in 2005/2006. This covered the areas of recruitment & selection; communication; staff induction & training and operational policies. The recommendations arising from this review were fed into the annual business process and have now all been actioned.

Further feedback is also gathered through the use of exit interviews regarding the recruitment and selection process again this has shown high levels of satisfaction. Recruitment questionnaires are also used to identify reasons for not submitting an application.

Triangle Housing Association is accredited with the Investors in People standard.

The recruitment and selection procedures which include all pre-employment procedures within Triangle Housing Association are included in the Human Resources policy and procedure manual which has been submitted for ISO 9001 quality accreditation. These procedures will all be audited regularly internally and periodically audited by external auditors.

5. ASSESSMENT OF IMPACT

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- 5.1 This section outlines our assessment of the impact of the Association's HR Recruitment and Selection policy on the 9 Section 75 groups based on the evidence considered above.
- 5.2 It has become apparent, following the conduct of this EQIA, that there are few adverse impacts that are directly related to the HR Recruitment and Selection policy.
- 5.3 Many of the issues raised during the IMS Pre-consultation survey highlighted concerns around Access & Communications in relation to services rather than specifically to HR Recruitment and Selection. Access & Communications were addressed as part of the associations' Year 1 EQIAs. As a result the majority of the concerns mentioned by respondents were either covered by the Mitigating Measures proposed at that time or have been identified for action as part of that process.
- 5.4 Other issues reflect general concerns but are not a specific comment on housing associations. We recognise the validity of some of these comments, especially as many associations were originally formed to tackle adverse impact and are committed to providing high quality services for the whole community.
- 5.5 Where we indicate that there is no evidence of adverse impact, this does not mean that no action will be taken. The Association is committed to promoting equality of opportunity for all and excellence in customer service, and will seek, where possible, to put measures in place to ensure that all sections of society have an equal opportunity to access appropriate redress when problems occur.
- 5.6 The issues that we have identified as having the potential to cause adverse impact are:
- **Religious Belief**
The 24 hour rota requirements may affect certain people with particular religious beliefs.
There may be issues with staff supporting users with different religious beliefs.
 - **Political opinion**
There may be issues with staff supporting users with different political beliefs. Better monitoring of this equality group will make further impact assessment easier.
 - **Racial Group**
Service users may not be aware of the sensitivities of people from racial minorities. Balancing our commitment to equality of opportunity for potential employees whose ability to communicate in

English is very limited against the needs of service users and legal obligations under Health & Safety can be problematic.

- **Men and Women generally**

Provision of personal care by staff of a different gender from that of the recipient. The sector we work in has generally a higher proportion of women employed due to the nature of the work done.

- **Marital Status**

There appears to be no adverse impact.

- **Age**

There may be age restrictions applied to certain jobs by law.

- **Disability**

This group is currently under represented in employment generally.

- **Persons with Dependants**

The 24 hour rota requirements may affect certain people with dependants. Work life balance policies may affect people with dependants.

- **Sexual Orientation**

There may be perceived prejudice in the work place towards this group.

- **Cross Cutting**

Managing situations where service users attitudes may cause adverse impact for staff providing care and support.

6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following are options that could potentially mitigate adverse impact arising from the HR Recruitment and Selection policies:

- Complete a review of workforce diversity to identify areas of underrepresentation within our workforce and take remedial action through the development and implementation of appropriate diversity strategies
- Review current monitoring arrangements and implement guidance regarding the extension of monitoring requirements by the equality commission
- Review Work/life balance strategies as part of our commitment to the Employer of Choice programme
- Further quantitative and qualitative analysis of employees leaving the association
- Review of procedures for recruitment and selection
- IIP re-accreditation
- Triangle will commit to achieve Employer of Choice status
- Further diversity awareness training for all recruitment panel members
- Review health and well being strategies
- Ensure the commitments made in Disability Action Plans are mainstreamed into Recruitment and Selection practices
- Keep Disability Discrimination adjustments under review
- Review policy regarding terms and conditions of employment for new staff upon commencement of post.
- Increase the use of occupational health services to support staff
- Comply with Access NI requirements for vetting
- Review the use of agency staff used
- Awareness training on the nine equality groups
- Review operational service delivery policies where appropriate

7. CONSULTATION

- 7.1 Triangle has endeavoured to give careful consideration to the measures that might be taken to make the HR recruitment and selection policy most efficient, effective and equitable. The measures outlined in section 6 are not intended to be definitive or exhaustive. The Association planned to formally consult on its findings over a 12 week period and welcomed feedback on these proposals and any other comments that would have assisted us to improve the policies.
- 7.2 Triangle ensured that it consulted effectively with those groups directly affected by its HR recruitment and selection policy, and their representatives.
- 7.3 Staff were available to discuss these proposals in person, by telephone, or by e-mail, as requested. Meetings could also have been arranged to discuss the way forward and the Equality Impacts of this document, if required.
- 7.4 The period of consultation ended on 29 August 2008
- 7.5 Comments in relation to this report were submitted in writing to: Alan Crilly

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60 Eastermeade Gardens
Ballymoney
Co Antrim**

**Tel No: 028 2766 6880
Fax No: 028 2766 2994
E Mail: alan.crilly@trianglehousing.org.uk**

- 7.6 Comments in any other format were also accepted.
- 7.7 If you require any further information, you may contact the Association using the contact details given in 7.5.
- 7.8 If you require information about housing associations generally or about the Joint Equality Exercise co-ordinated by NIFHA please contact:

The Northern Ireland Federation of housing Associations

38 Hill Street

Belfast

BT1 2LB

 028 9023 0446

 www.nifha.org

8. CONSULTEE FEEDBACK

- 8.1 Triangle has seriously considered all comments received in making the final decision on the recommendations of this EQIA.
- 8.2 The results of the EQIA will be published on our website, which will be made available to all consultees. Alternative formats will be available on request.
- 8.3 Systems will be established to ensure the ongoing monitoring of the impact of the policies on relevant groups.

EQIA Consultation Processes

Northern Ireland Federation of Housing Associations (NIFHA), the umbrella body for the 33 registered and 7 non-registered housing associations in Northern Ireland facilitated the participation in a joint approach to the consultation throughout the housing association sector. The Federation assisted members in this process by:

- Developing a care and support specific response template to ensure consistency of draft EQIA's across the 33 designated associations
- organising pre-consultation training at it's forums
- publicising the 12 week consultation period in the three main Northern Ireland daily papers
- issuing a composite disk containing the draft EQIA's of all designated housing associations to the organisations listed at Appendix A (additional discs were also issued on request)
- Representing the housing association movement at joint consultation events hosted by the NI Housing Executive
- Acting as a conduit for information and consultee responses

Triangle participated fully in this joint approach and the Director of Finance & Corporate Services sat on the NIFHA Equality Co Ordination Group.

Public Consultation

Designated housing associations consulted on their draft EQIA's for a 12 week period to 29th August 2008. Triangle Housing Association will take the following comments or detailed responses from the following consultees into consideration when producing the final versions of its strategic and annual plans commencing April 2009.

Responses from three organisations and one individual were received and a summary of their responses is summarised below.

To publish information in different formats; To include recruitment and selection of board members; To provide disability awareness training; and enhanced monitoring.
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Review HR forms and information; review panel representation; make reasonable adjustments; trial and support employment and set smart objectives.

Advertise widely; use positive action; recruitment and selection panel training; set objective selection criteria and enhanced monitoring systems

Triangle response

Publication of information and forms in different formats was covered in an EQIA on Access and Communications in year one of our equality scheme. Triangle is continuing to implement the recommendations which arose then, which address these issues. Triangle will provide awareness training and enhance monitoring systems. Recruitment and selection of board members will be considered in the EQIA on governance. Advertising and selection criteria will be reviewed. These measures and the mitigating measures above will be incorporated into the associations strategic and operational plans from April 2009.

Staff Consultation

All staff of Triangle Housing Association were invited to discuss the draft EQIA at their staff team meetings. A letter outlining the consultation was sent to each member of staff and questionnaires were circulated through each manager. There responses are summarised below.

To keep recruitment and selection policies under review and in line with best practice; embrace the employer of choice strategy

Triangle response

Triangle has now attained ISO 9001; 2000 standard and will keep all policies and procedures under review. Triangle has developed an Employer of Choice Strategy.

Tenant and Service User Consultation

All tenants of Triangle Housing Association were invited to discuss the EQIA at their tenant meetings or make a direct response. An easy read letter

outlining the consultation was circulated through each manager to tenants with learning disabilities. The responses are summarised below.

To involve people with disabilities in recruitment and selection.

Triangle response

Triangle involves people with disabilities in recruitment and selection and will keep all policies under review.

Stakeholder Consultation

The association's partner organisations were also invited to respond.

Triangle Housing Association would like to take this opportunity to record their thanks to all individuals and/or organisations that took the trouble to share their experience and submit their comments.

APPENDIX A

LIST OF ORGANISATIONS THAT RECEIVED DRAFT EQIA DISK – JUNE 2008

Action Mental Health
Age Concern Northern Ireland
Barnardos
British Deaf Association (NI)
Brainwaves Northern Ireland
Carers Northern Ireland
Child Poverty Action Group (NI)
Blind Centre for NI
Community Development & Health Network (NI)
Disability Action
Down's Syndrome Association
Employers' Forum on Disability
Equality Commission for NI
Help the Aged Northern Ireland
Leonard Cheshire Foundation
MENCAP
Northern Ireland Association for Mental Health
North West Forum of People with Disabilities
PRAXIS
Parents & Professionals & Autism
Rethink
Royal National Institute for the Blind (NI)

Royal Institute for Deaf People (NI)
Sense NI
The Cedar Foundation
The Guide Dogs for the Blind Association
Threshold – Richmond Fellowship NI

APPENDIX A

LIST OF ORGANISATIONS THAT PARTICIPATED IN THE JOINT CONSULTATION EVENTS HOSTED BY NIHE

Action Mental Health
Advice NI
Cedar Foundation
CRC
Disability Action
Equality Commission
Information Commission
MENCAP
NITAP
North Down Community Network
Probation Board NI
PSNI
QUB
Rethink
RNIB
SCA
The Blind Centre
Visual Access NI
Women's Forum NI

Appendix B

RECRUITMENT & SELECTION PROCEDURE

1. Introduction

This document is intended to provide a framework for the consistent, fair and efficient recruitment and selection of Triangle employees. The Association recognises that the recruitment and selection of appropriately experienced, skilled and qualified staff is key to ensuring high quality service provision for its service users and is committed to all measures that ensure such outcomes.

2. General Principles

In the implementation of this procedure, the Association will ensure that there is efficient use of the time and expenditure, monitoring and reviewing costs as appropriate.

The following core principles apply in the implementation of this policy:-

- i. the right candidate is recruited to the Association
- ii. recruitment is undertaken in a timely and cost effective way
- iii. all staff involved in the process are appropriately trained
- iv. ensuring equal opportunities and a diverse workforce
- v. creating a 'good shop window' for the organisation

This procedure recognises and operates within the requirements of Equality legislation and associated Codes Of Practice as well as the Association's Equal Opportunities policy.

3. Commencing the Recruitment Process

When a need is established to recruit to a new post or existing vacancy, managers should complete the 'Request to Recruit proforma' (Appendix 1) ensuring that it is authorised by the relevant Director and forwarded to Human Resources.

The relevant job description and/or person specification should be reviewed by the manager and any amendments notified to Human Resources. Managers should also include any additional information to be included in the application pack.

It should be noted that all job descriptions and person specifications will need to be reviewed by the Human Resources Manager to ensure that they are consistent across the Association and comply with any relevant employment legislation. Once this has been completed, final approval must be sought from the Director.

4. Job Analysis

Where no job description/person specification exists or an existing document requires a substantial review, job analysis should be undertaken by the manager to identify the key tasks and responsibilities using the 'Job Analysis' proforma (Appendix 2).

This information should be forwarded to Human Resources to prepare a draft job description for approval by the manager. Once this has been completed, final approval must be sought from the Director.

Where a post is a new post or the job analysis has identified substantial changes, a job evaluation will be undertaken by the Human Resources Manager and a report prepared for the relevant Director recommending the appropriate salary grade. Once this has been completed, final approval must be sought from the Chief Executive Officer.

5. Job Description

All job descriptions must be laid out in the Association's agreed format to maintain the corporate image in line with quality standards. A library of all the Association's current job descriptions is held in Human Resources.

6. Person Specification

All vacancies advertised by the Association must have a current person specification (Appendix 3) and the attributes listed must be objective, justified and measurable. The method of assessment should also be considered when agreeing the person specification. The Association use the application form and interview process as standard assessment methods however additional tools such as tests, presentation etc may also be used in addition.

All selection methods must comply with the Association's Equal Opportunities Policy and advice should be sought from Human Resources when considering additional selection methods.

At interview, all candidates will be assessed via the interview assessment questions which are based on the job description and person specification. An assessment sheet must be completed for all candidates and any successful candidate will have clearly demonstrated that they fully meet at least all the essential requirements of the post listed in the person specification.

7. Advertising

Human Resources are responsible for placing the advertisement in the agreed publications in the Association's agreed format. It is also responsible for monitoring the effectiveness of the advert through response rates, suitability of applications and advertising costs. All final versions of recruitment adverts must be approved by the relevant Director before appearing in print.

It is the Association's policy to externally advertise all permanent posts so as to enable all sections of the community to apply. A list of agreed publications can be found in the Human Resources department. Managers who would prefer to advertise in alternative publications should discuss the issue with a member of the Human Resources department.

Posts of a temporary or casual nature may be externally advertised, internally trawled or recruited via recruitment agencies dependant on the circumstances.

8. Shortlisting

The Association will endeavour to shortlist as soon as possible after the closing date, no later than 5 working days.

A member of the Human Resources department will attend and fully participate in every shortlisting panel. The other members of the shortlisting panel should be the same as the intended interview panel and, so far as possible, should comprise of at least 3 persons who represent a cross-section of the 9 main equality groups. If any member of the interview panel cannot attend the shortlisting for whatever reason, they must agree the shortlist with the other members of the selection panel prior to interview.

When shortlisting has been completed, it is the responsibility of the Chairperson of the shortlisting panel to ensure that all the relevant

documentation is completed, signed and returned to the Human Resources representative present. S/he should also ensure that they specify the date, interview times, venue and panel for the interview on the shortlisting form. Where possible, the interview assessment should also be agreed at this point.

9. Interviews

The Association will endeavour to interview as soon as possible after the closing date, no later than 10 working days.

A member of the Human Resources department will attend interview panels, participating in a voting or observer capacity as appropriate. Employees cannot participate in a voting capacity on any interview panel for a position at the same grade or a higher grade.

Where appropriate, a minimum score for appointment should be agreed by the panel prior to the interviews. As an Equal Opportunities employer, the highest scoring candidate(s) are deemed successful for the post.

The Association is committed to including its services users in the recruitment and selection process. Service users will therefore form panel members for appropriate vacancies, participating in asking questions and scoring candidates to a degree commensurate with their individual capacity to do so. Any service users involved in the recruitment and selection process will have undertaken accredited training to enable them to fulfil their role.

After interviewing it is essential that the panel complete and sign the interview assessment sheets (Appendix 4) for every candidate as well as the interview outcome form (Appendix 5) indicating the successful candidate and reserve candidate, if appropriate, as well as the details of the post being offered. It is the responsibility of the Chairperson of the interview panel to provisionally offer the successful candidate(s) the post(s).

These written records should be used where a candidate requires feedback on their performance or contests the panel's decision at an Industrial Tribunal, hence they should provide clear evidence of why a candidate was unsuccessful at interview.

10. Post Interview Follow Up

Vetting Procedures

All provisional offers of employment are subject to 2 satisfactory references, police check and confirmation of medical fitness to undertake the duties of the post. All provisional offers must stipulate these conditions for employment with Triangle. All applicants will also be required at interview to provide confirmation of their entitlement to work in the United Kingdom in line with the Association's statutory obligations as well as evidence of essential qualifications and/or driving licence where essential.

A standard form is used when seeking references. References will be sought only for successful candidates, where possible within 1 working day of the interview taking place. Where it is essential to make an offer of employment within a short timeframe, verbal references may be obtained for the successful candidates.

Written Offers of Employment

Once the successful candidates have been verbally offered the post subject to the vetting procedures, a formal letter will be sent to the new employee confirming details of the employment being provisionally offered.

Reserve Candidates

Where the panel agree they could appoint more than one candidate from the interviews conducted because of the high standard of the interviewees, the Association may hold suitable appointees' applications in reserve should a similar vacancy arise in the future. The limit of time on reserve is 12 months and this allows the Association to automatically select the reserve candidate.

Advising Unsuccessful Candidates

Following the interviews, the Human Resources department will be responsible for contacting all unsuccessful candidates in writing. In the event of a request for feedback, this should be agreed by the Chairperson and followed up in writing by Human Resources.

Contract of Employment

All new employees are issued with their written statement of their main terms and conditions within 8 weeks of commencing employment.

11. Review of Workforce Composition

The Human Resources department is responsible for monitoring workforce composition and providing relevant reports in line with statutory obligations and the Association's equality and diversity strategies. Where it is identified that certain groups are under-represented within the workforce, an appropriate affirmative action programme will be implemented.

12. Review of Procedure

This procedure will be reviewed in line with organisational requirements and changes to the statutory framework.

The procedure may be varied where the Association considers that it is necessary in order to ensure that the procedure followed is fair. Any such changes will be subject to consultation with the parties involved with a view to finding agreement on a way forward. The Association reserves the right to digress from this procedure in so far as it may be inconsistent with its legal obligations as employer and/or the legal rights of the individual applicant or employee.