



**Triangle Housing Association Ltd**

**CARE AND SUPPORT**

**Equality Impact Assessment**

**Final Report**

**December 2008**


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

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Registered Unit Policy

Supported Employment Policy

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## 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 Care and Support policy is:

To deliver to people with care and / or support needs appropriate services which maximise their quality of life, 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 Care and support policies
- 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.

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## 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 Care and Support policies were scheduled for assessment in year three of this programme.

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

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

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

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

2.7 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**

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## Description of Policy

The Care and Support policies describe the Care and Support service the Association provides to its tenants and the wider community.

## Policy Aim

3.1 The aim of the Care and Support policies is:

To deliver to people with care and / or support needs appropriate services which maximise their quality of life, whilst operating within available resources.

The scope of the Care and Support activities covered in the policy include:

- **Housing Support** – This covers support services funded by supporting people grant\* which is managed by the NIHE. By housing support we mean:
    - sheltered housing for older people
    - supported housing for people with support needs
    - floating support which is outreach services based on the needs of the individual regardless of whether they are a tenant of the association
- \*Please see below for details of the types of people who may be entitled to the Supporting People Grant.
- **Care Support** – This covers care services funded by the health and social care trusts; the department of health and by personal care charges. By care support we mean personal care e.g. help with daily living tasks.
  - **Residential/Nursing Care** – This covers care support provided in accommodation registered with the Regulation and Quality Improvement Authority (RQIA). This is usually funded by the health and social care trusts.
  - **Training and Employment Support** – This covers training and employment support funded by the Department of Employment and Learning (DEL) and/or other government departments. By training and employment support we mean foyers; training schemes for tenants and assistance to individuals to access employment.

Underpinning objectives include:

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A key objective of housing association support services is to make a positive difference by addressing adverse impact.

\* Supporting People funding may be available to help the following types of people:

- Older people
- People with learning difficulties
- People with mental health problems
- People with physical disabilities
- Women fleeing domestic violence
- Homeless people
- People struggling to meet their tenancy conditions
- People leaving institutional care

## **Scope of Review**

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

### External

- Access NI (ANI)
- Applicants for support services listed at 3.1 above
- Current service users
- Department of Employment and Learning (DEL)
- Department for Social Development (DSD)
- Elected representatives
- General public
- Health and Social Care Trusts
- Inspection and assessment bodies
- Northern Ireland Housing Executive (NIHE)
- Northern Ireland Social Care Council (NISCC)
- Other Housing Associations
- Other statutory agencies
- Partners or providers of Housing Support Services
- Past service users
- Recognised service user groups/organisations
- Relatives and carers
- Representatives of the local community
- S75 representative groups
- Suppliers

### 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 Care and Support.

### Inspection and Assessment bodies

There are also other bodies that can look at aspects of the Association's Care and Support service:

- Regulation and Quality Improvement Authority RQIA
- The NIHE's Supporting People Team
- Environmental Health
- Equality Commission NI

### Ombudsman

Anyone dissatisfied with the way in which the Association carries out its Care and Support 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 Care and Support policies.

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 Care and Support 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** - The Year 1 EQIA on this policy dealt with overall issues relating to accessing the association's services (including care and support) and

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communicating with the organisation. Please note criteria for accessing these services are based on need and set by the Supporting People Commissioners not the associations

- **Complaints about Care and Support** – This was covered by the Year 1 EQIA on Complaints
- **Care and Support services which are totally provided by a Joint Management Partner** – This is when the association provides the building but another organisation provides the support service.
- **Maintenance in a Care and Support setting** – This was covered by a Year 2 EQIA
- **Setting support and other charges** - This will be covered in a separate EQIA

3.4 Care and Support policies are intrinsically linked to all of the Association's key policies and processes, depending on the nature of the service.

### **Legislative and Regulatory Requirements**

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

- Health & Personal Social Services (NI) Order 1972
- Enduring Powers of Attorney (NI) Order 1987
- Sexual Offences (NI) Order 1978
- The Fire Regulations and the Fire Precautions Order 1984
- The Housing Benefit (General) (Amendment No.2) Regulations (NI) 1987
- Social Security Claims and Payments Regulations (NI) 1987
- The Food Safety (NI) Order 1991
- Health & Safety at Work Regulations (NI) 1992
- Registered Homes (NI) Order 1992
- Disability Discrimination Act 1995
- Mental Health Order 1996
- Prescription Only Medicines (Human Use) Order 1997
- Data Protection Act 1998
- Section 75 of the Northern Ireland Act 1998
- Fire Precautions (Workplace) Regulations (NI) 2001
- Misuse of Drugs Regulations 2001
- Sex Offenders Act 2001
- Housing Support Services (NI) Order 2002
- Health & Personal Social Services (Quality, Improvement and Regulation) (NI) Order 2003 and associated regulations
- Protection of Children and Vulnerable Adults (NI) Order 2003

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- Health & Safety Control of Substances Hazardous to Health Regulations (NI) 2003 (COSHH)
  - The Children's (NI) Order 2003
  - Residential Care Homes Regulations (NI) Order 2005
  - DSD Regulatory Framework (2006)
  - Food Hygiene Regulations 2006
  - The Health & Safety at Work & Fire Precautions (Workplace) (Amendment Regulations (NI) 2003
  - The Smoking NI Order 2006
  - Domiciliary Care Regulations (NI) 2007
  - Safeguarding Vulnerable Groups (NI) Order 2007
  - Disability Discrimination Order 2006

This list is not exhaustive.

3.6 In addition to Care and Support 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 are Care and Support policies in place, as part of our commitment to delivering an excellent customer service the Equality Impact Assessment presented an opportunity to improve the existing policies.
- (b) The Association believes that access to services, including Care and Support, is of high importance to S75 groups.
- (c) Triangle also believes that its Care and Support policies merited an equality impact assessment to demonstrate its commitment to providing an efficient and effective service to its tenants. The Association provides services to a diverse range of customers including many client groups with special needs.
- (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**

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- 3.8 The Care and Support policies have been defined by the Association's Board and / or management team. It is implemented by relevant staff throughout the Association.

The association also works to the following standards:

The Quality Assurance Framework which is a self assessment document used to check the quality of service funded under Supporting People. This inspection process is used the NIHE to ensure compliance with the standards set for providers of support services. The NIHE's Supporting People team usually follow up with a verification visit.

The Regulation Quality and Improvement Authority have the power to set standards for service provision and inspect Domiciliary Care, Registered Homes, unregistered Day Care facilities and family centres as well as the Social and Clinical Governance arrangements of these services. The Department of Health, Social Services and Public Safety have developed minimum standards for a range of regulated services including Nursing Homes. The RQIA will look for evidence that the standards are being met through: discussions with patients, staff, managers and others; observation of activities in the home; and inspection of written policies, procedures and records.

The Northern Ireland Social Care Council monitor, inspect and register the health and social care sector against set employer and staff standards. It is an independent public body, established to increase public protection by improving and regulating standards of training and practice for social care workers.

Triangle's supported employment services are developed in compliance with Northern Ireland Union of Supported Employment which is an umbrella group representing providers.

All services provided to vulnerable adults and/or children require preventative checks through Access NI to ensure staff are cleared to work in the health and social care sector.

- 3.9 Care and Support policies documents are developed in compliance with legal requirements and agreed by Triangle Board and Senior Management Team.
- 3.10 Triangle Housing Association provides accommodation for people with a variety of housing needs developed in areas where housing need has been identified by the NIHE and (where possible) these homes are built

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to a lifetime homes standard. As the statutory housing authority the NIHE is responsible for collecting data and identifying housing need and supporting the Association in the delivery of the housing development programme.

### 3.11 Housing Support

Housing Support is designed to help people live independently. It is usually provided to those living in particular types of accommodation, such as sheltered housing schemes for older people or supported housing schemes for people with support needs. A Housing Support worker will assist those living in these types of schemes to remain independent. Housing support services are not time limited, they are available for as long as the person needs them. Housing support covers a range of activities including some or all of the following

- giving general counselling
- providing advice and support
- making daily calls
- maintaining safety of equipment,
- maintaining the security of dwellings
- offering help with benefits
- arranging activities for tenants
- life skills training such as budgeting, shopping, cooking

Floating Support is a particular type of housing support that is based on the needs of the person rather than where they live. It is only offered for a limited time period and is intended to help people to deal with problems that might result in the loss of their home. Floating support is only available in certain situations such as:

- addiction
- homelessness
- need for advice to manage debt
- young people leaving care
- series of complex needs anti social behaviour

### 3.12 Care Support

Care support offered by Triangle Housing Association includes:

- help to plan for personal care
- help with taking medication
- assistance with cooking & eating meals
- help with personal hygiene
- help with a person's personal development
- help with dressing and undressing

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- help with travel and getting about

The care offered in these schemes is usually low level and the schemes are not registered under the RQIA. Schemes are partially funded by the Healthcare Trusts

Triangle Housing Association also provides a number of day services where tenants remain at home during the daytime.

### 3.13 Residential / Nursing Care

Residential and Nursing Care offers similar types of care to those listed above but it usually more intensive. The schemes are registered with RQIA and subject to RQIA inspection. The schemes are funded through Healthcare Trusts and referrals are usually made by social services.

### 3.14 Training and Employment Support

The training and employment support we offer is to adults with learning disabilities and includes:

- Personal action plans to decide on types and levels of training and supported employment provided.
- Training provided can include basic numeracy and literacy skills as well as IT, employment, life skills and personal development courses.
- Employment support can be provided in sheltered work centres or employment in the community

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## **4. CONSIDERATION OF AVAILABLE DATA AND RESEARCH**

### **Sources of information**

- 4.1 The following were used in considering available data relevant to the impact of the Care and Support policies:
- a) Pre-consultation research commissioned by NIFHA and undertaken by IMS Consultants during March 2008
  - b) Internal events to assess the impact of Care & Support policies held during November 2007
  - c) The Association's internal management information on the profile of tenants and service users
  - d) 2001 Northern Ireland Census Data
  - e) Office for National Statistics
  - f) Northern Ireland Research and Statistics Agency data
  - g) NICORE reports – statistics of all lettings made by the Association
  - h) Housing Waiting list data
  - i) Annual Regulatory Returns
  - j) Data from NIFHA's Annual Benchmarking exercise
  - k) Qualitative Feedback from Care and Support staff
  - l) Triangle Housing Association's Tenant Satisfaction Surveys
  - m) Triangle Housing Association's Service Review Surveys
  - n) Supporting People Scheme reviews and self assessments
  - o) RQIA Inspection reports
  - p) Complaints and compliments relating to Care and Support
  - q) Equality Commission Codes of Practice
  - r) "At Home in the Community" research which Triangle did on the social exclusion of people with a learning disability.
  - s) Qualitative and quantitative feedback Commissioners

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**

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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	Lack of care at home (generally) Mobility and access Living in run-down accommodation due to financial pressures Need to work with housing associations that cater for elderly Chinese community Consultees cited access to services (in general) as a issue affecting young
	Housing association meetings in Nov 2007	Sheltered accommodation is only available to people above a certain age Foyer accommodation is only available to those aged 16 -25 Housing associations are not allowed to provide care or support services to those under 16
Dependents	IMS pre-consultation survey	Consultees cited no issues that affected people with dependents however the difficulty of getting a new home suitable for a divorced person with children was mentioned in relation to marital status
	Housing association meetings in Nov 2007	Identified potential for adverse impact if carers could not be accommodated due to the limitations of the building or the tenancy
Disability	IMS pre-consultation survey	Mobility and access Whether personal care is available Whether policies accommodate mental health issues
	Housing association meetings in Nov 2007	Some care services will cause adverse impact because that is the aim of the service – for example meeting a particular health need such as helping those with mental health difficulties
Gender	IMS pre-consultation survey	Consultees suggested there is a need to keep separate policies for men and women Homophobic attacks on homes
	Housing association meetings in Nov 2007	Some service users may have issues about personal care due to the fact that most staff in care situations tend to be female

S75 Category	Source of data	Issues highlighted
Marital status	IMS pre-consultation survey	Availability of housing and support for single people The difficulty of getting a new home suitable for a divorced person with children
	Housing association meetings in Nov 2007	There is potential for adverse impact for a married couple who want to share a room in a care home as most facilities are not set up to meet this need
Political opinion	IMS pre-consultation survey	Consultees cited no issues
	Housing association meetings in Nov 2007	No issues were identified
Racial Group	IMS pre-consultation survey	Lack of awareness of what sort of care and support is available to those who have been victims of racism or hate crimes Language barriers in terms of understanding how to access information and also in relation to the quality of information available Specific consideration should be given to ethnic groups with other problems Migrant workers should have access to training and employment support (N.B. this appeared to be a general comment) Majority of information provided is not available in Chinese
	Housing association meetings in Nov 2007	Staff recognised there could be access issues but felt these had been addressed in the Year 1 EQIA on this topic The level of English required for the post could have adverse impact for some people Staff identified potential for adverse impact for migrant workers Staff also recognised that problems may arise as a result of service users not wanting staff from a different background

S75 Category	Source of data	Issues highlighted
Religious belief	IMS pre-consultation survey	Consultees cited no issues in this area
	Housing association meetings in Nov 2007	<p>Association staff felt there was potential for adverse impact in relation to:</p> <ul style="list-style-type: none"> <li>• Dietary requirements</li> <li>• Prayer rooms</li> <li>• Managing death</li> <li>• Gender issues</li> <li>• Storage of food</li> </ul> <p>The relevance of these points would depend on the type of scheme and the religion of the individual</p> <p>Transporting service users to religious venues may cause difficulty for care staff whose beliefs differ from that of the client</p>
Sexual orientation	IMS pre-consultation survey	<p>Lack of housing / care support for younger people who have been put out of their home because of their sexual orientation</p> <p>Higher consideration needs to be given to those who are the victims of hate crimes or homophobic attacks on their home</p> <p>Older people used to a society that is not accepting of same sex relationships may feel they have to hide their true identity if they have to move to a residential home</p>
	Housing association meetings in Nov 2007	No issues were identified

## Profile of Service Users

4.4 The Association currently has approximately 500 units of accommodation throughout Northern Ireland. Most of the accommodation is special needs accommodation. Approximately half of the special needs accommodation is managed by our partner agencies and the remainder is managed directly by Triangle. By directly managed by Triangle we mean Triangle employs the staff providing the service and establishes the policies they adopt in delivering the service. Housing support, care support and residential care is provided through these units of accommodation. This support is primarily given to adults with learning disabilities although there are other tenants/service users with other special needs. Triangle also provides floating support housing services in Belfast and the Northern Health and Social care Trust areas. This service gives support to people to maintain their tenancies or access accommodation.

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Triangle also provides employment support to adults with learning disabilities across the Northern Health & Social Care Trust area. This is provided in four special sheltered employment sites or support is given to clients working in the community.

Some training and employment preparation is given to children in special needs schools in the same area.

4.5 The principal sources of equality information about tenants/service users are tenant/service users' surveys; benchmarking; commissioner performance returns management information and other statistics. This information shows high levels of overall satisfaction with the services provided.

4.6 The breakdown of the Association's tenants in receipt of Care and Support services by age shows that the tenant population of adults with learning disabilities is increasing.

The Association does not provide a secure tenancy to anyone under the age of 16 years due to the restrictions of the statutory Housing Selection Scheme.

4.7 The Association's tenant/service users nearly all have a disability however in relation to other Section 75 Categories it is in line with the general population.

4.8 At present, Triangle does not collect data on political opinion or sexual orientation. Triangle Housing Association will add these categories to their monitoring form to begin to gather this information.

4.9 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.

4.10 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**

4.11 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 79 complaints about its Care and Support service all of which were dealt with at stage one of our complaints procedure. There were no complaints that would indicate adverse impact arising from these policies.

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## **User Satisfaction Surveys**

4.12 The Association's User Satisfaction Surveys invite tenants to state if they are satisfied with the Association's standard of service. The results showed that the user's have high satisfaction levels of the Association's service.

## **Inspection/ Satisfaction Reports**

4.13 The Department for Social Development's Inspection Report 2007 concluded that Triangle Housing Association has established a fairly sound internal control environment within the area providing support services.

NIHE Supporting People Service Reviews have not yet been carried out however Triangle has self assessed it's services as grade B against the Quality Assessment Framework.

All RQIA reports for the one registered home are favourable.

A best value service review is currently underway for the supported living service. The review of the supported employment service showed it was a very good service and was better than a lot of comparators.

## **Ombudsman Report**

4.14 There have been no complaints raised with the Ombudsman in relation to the Care and Support where Triangle HA was found to be at fault by practices of this association.

### **Other data**

The association recently commissioned research by the University of Ulster to look at social inclusion of adults with learning disabilities moving from registered accommodation to independent living.

## **5. ASSESSMENT OF IMPACT**

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- 5.1 This section outlines our assessment of the impact of the Association's Care and Support policies 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 very few adverse impacts that are directly related to the Care and Support policies.
- 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 Care and Support. Access & Communications was addressed as part of the associations' Year 1 EQIAs. As a result the majority of the concerns mentioned by respondents were either covered by the Mitigating Measures proposed at that time or have been identified for action as part of that process.
- 5.4 Other issues reflect general concerns that are outside the scope of this particular EQIA or even the remit of the individual association e.g. lack of healthcare identification of housing/support needs or even training requirements. Where relevant associations will raise these matters with the appropriate authority. In addition, NIFHA and/or association representatives participate in a wide range of inter-agency groups aimed at addressing issues such as community safety, and the provision of care and support.
- 5.5 We also feel it is important to state that the very nature of some care or support services will bring a certain amount of adverse impact as they were set up to address the needs of a particular group. For example our supported housing is intended to be for adults with learning disabilities therefore it would not be suitable for other groups. Similarly schemes for homeless or vulnerable users would not be appropriate for those who do not have that need.
- 5.6 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.
- 5.7 The issues that we have identified as having the potential to cause adverse impact are:
- **General Issues**
  - Age restrictions generally

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- The age at which people can access supported housing
  - Provision of personal care by staff of a different gender to the recipient
  - Married couples who wish to share accommodation in a residential or supported housing setting
  - Balancing our commitment to equality of opportunity for potential employees whose ability to communicate in English limited against the needs of service users and legal obligations under Health & Safety
  - Managing situations where service users attitudes may cause adverse impact for staff providing care
  - Accommodating the religious needs of an increasingly diverse community

- **Religious Belief**

The staff rota requirements may affect certain people with particular religious beliefs.

There may be issues with staff supporting users with different religious beliefs. There may be religious emblems etc in communal areas of some supported housing or registered accommodation.

- **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. Vulnerable adults have to be supported in the voting process if required. Some users may not realise some political emblems may cause offensive.

- **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 providing the service due to the nature of the work done. Sometimes it is necessary to control which genders live in shared supported housing due to their special needs.

- **Marital Status**

There may be issues of access to services as some accommodation is for shared or single users.

- **Age**

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

- **Disability**

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Most of Triangle's accommodation is for adults with learning disabilities. Also this group is currently under represented in employment generally.

- **Persons with Dependents**

- There may be issues of access to services as some dependents may not be able to live with tenants/service users.

- **Sexual Orientation**

There may be perceived prejudice in the accommodation towards this group.

- **Cross Cutting**

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

- There is clear criteria for accepting clients. These focus on need and are largely set by commissioners. Some people who are excluded from floating support services e.g. registered sex offenders and those with a serious history of violence, however, this does not impact on any specific equality categories
- Access to the service and general awareness of service availability was the main issue raised by groups representing ethnic minority groups, single people and young people from same sex relationships. Triangle acknowledges that this is an issue and will look at how it advertises services. We will also look at providing training to ensure that staff are aware of users' needs (e.g. cultural requirements, disabilities etc.)
- There are issues with existing monitoring systems. The NIHE focuses solely on ethnic minorities. This is an issue that may have to be referred to the NIHE, but Triangle could look at some local monitoring systems.
- The length of service is the main issue raised by floating support clients. Supporting People guidelines are very clear that floating support cannot be provided beyond 2 year period. There are no equality issues as service users are referred to more suitable long term services, where required.
- Most of Triangle's operational policies affect how the service is delivered. Some policies are influenced by commissioners requirements.

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

The following are options that could potentially mitigate adverse impact arising from the Care and Support policies:

- Provision of information in alternative formats where appropriate (usually care and support plans will have identified what is required by the individual user).
- Offer flexibility in the level of support provided i.e. dependent on the needs of the user(s). Where possible, and whilst operating within available resources, adapt the service to suit the specific needs of the user.
- Conduct ongoing training programmes to ensure awareness of diversity and cultural issues – these should include services users as well as staff.
- Work in partnership with other Housing Associations to arrange cultural awareness days/activities; invite representatives from groups to attend meetings in a joint approach to raise the profile of Housing Associations and to increase awareness of different groups and the range of their needs.
- Promote the work of Triangle Housing Association within the local communities to ensure that potential service users from all S75 categories are aware of the care and support that is available.
- Work with the local community to promote social inclusion and good relations.
- Promote and support activities that encourage greater understanding, tolerance and respect for Section 75 groups
- Keep all operational service delivery policies under review
- Lobby on the needs of people with special needs and the requirements of accommodation and service delivery
- Review current monitoring arrangements and implement guidance regarding the extension of monitoring requirements by the equality commission
- Ensure the commitments made in Disability Action Plans are mainstreamed into housing care and support practices.
- Keep Disability Discrimination adjustments under review
- Ensure the services people get are appropriate to their needs
- Implement our supported living and floating support social inclusion plans
- Continue to involve tenants/service users in developing services

## **7. CONSULTATION**

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- 7.1 Triangle has endeavoured to give careful consideration to the measures that might be taken to make the Care and Support policies 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 Care and Support policies, 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

**Triangle Housing Association Ltd  
60 Eastermeade Gardens  
Ballymoney  
Co Antrim**

**Tel No: 028 2766 6880  
Fax No: 028 2766 2994  
E Mail: [alan.crilly@trianglehousing.org.uk](mailto:alan.crilly@trianglehousing.org.uk)**

- 7.6 Comments in any other formats were 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**

## **8. CONSULTEE FEEDBACK**

- 8.1 Triangle has seriously considered all comments received in making the final decision on the recommendations of this EQIA.

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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 29<sup>th</sup> 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 two organisations and one individual were received and a summary of their responses is summarised below.

To publish information in different formats; add legislation to the list 3.5; enhanced monitoring and accessible website
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## Triangle response

Publication of information in different formats including accessible websites 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. The legislation has been added to the list.

### **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. Their responses are summarised below.

To enhance social inclusion and encourage participation in communities; to provide equality training
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## Triangle response

Triangle has developed strategies in each of these areas and will keep all policies under review.

### **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 awareness raising; and to continue to ask for disabled peoples views and increase their social inclusion
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## Triangle response

Triangle has developed strategies in each of these areas and will keep all policies under review.

### **Stakeholder Consultation**

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

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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**

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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

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## Appendix B

### Floating Support Policy

Triangle is committed to providing high quality floating support services that help vulnerable people sustain and maintain their tenancies, by promoting independent living.

In seeking to achieve this aim, the Association will:

- Regularly review the needs of service users
- Fully involve service users, carers and/or other professionals (if service users wish this) in needs and risk assessments and reviews and take full account of their views
- Regularly review all procedures to ensure compliance with best practice
- Ensure that staff have the appropriate skills to deliver the service
- Establish clear eligibility criteria for each service and ensure that there is transparency in the assessment process
- Ensure that all applicants refused floating support have the right to appeal the Association's decision
- Develop positive working relationships with key agencies and seek their feedback as part of service planning and review
- Ensure that service users have the right to initiate a review of their support needs at any time
- Develop support plans, in consultation with service users and, if appropriate, carers, relatives or other advocates, that are individually tailored to meet each person's needs and are outcome based to support them to achieve their maximum degree of independent living
- Regularly review and update support plans to meet the changing needs of service users

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- Liaise with other agencies and support providers where necessary to ensure our customers access all the support and care that they require
  - Provide information on other services that all our customers can access
  - Promote the rights of service users and advocate on their behalf when required.
  - Seek to protect the security, health and safety of all individual service users and staff
  - Ensure that robust, up-to-date procedures are in place to protect service users from abuse
  - Promote equality of opportunity for all existing service users and potential applicants wishing to access floating support. No one will be treated unfairly because of gender, race, colour, ethnic or national origin, religion, disability, marital status, age, sexuality, political opinion or caring responsibilities
  - Make all service users, carers and other stakeholders aware of the complaints procedure and how to use it, and use any complaints as a tool to improve services
  - Respect the needs and wishes of all our customers and their rights to privacy and confidentiality

### **About Floating Support**

Floating support is a short term (maximum 2 years) flexible support service that helps vulnerable people sustain and maintain their tenancies by promoting independent living.

Key elements include:

- Understanding the terms and conditions of tenancies, rights and responsibilities of the client and the landlord (private or registered social landlords).
- Assist clients liaising with landlords on a range of issues.

- 
- Guidance on furnishing homes.
  - Guidance on relationships with neighbours/ problems with harassment/ noise nuisance/ antisocial behaviour.
  - Maximise income by reviewing and claiming welfare benefits.
  - Money management / budgeting / debt advice.
  - Helping clients deal with general correspondence / opening bank accounts / managing bills.
  - Encouraging social interaction in the community to minimize social isolation / provide emotional support.
  - Enable access to information regarding education / employment or training.
  - Provide clients with information on other agencies who can give advice / support, particularly in relation to specific issues.
  - Regular visits as agreed in the support plan.
  - Crisis intervention where necessary.
  - Personal care, cleaning or washing cannot be provided under this service.

### **Eligibility Criteria**

The criteria for each service are as follows:

#### **Key Project**

- Must live within the Northern Health Board area.
- Be looked after by the Trust / Be a child in need.
- Be homeless/ threatened homeless.
- Vulnerable.

- 
- Aged between 16-21.
  - Referrals are only accepted from 3 agencies;
    - NIHE
    - NHSSB
    - Other Triangle Floating Support services.  
(No self referrals will be accepted)
  - Exclusions-serious history of violence or those convicted of a sexual offence.

### **Belfast Service**

- Must live within the Belfast Trust area.
- Adult service.
- Must have addiction issues.
- Referrals are only accepted from;
  - Addiction services within the Trust.  
(No self referrals will be accepted)
- Exclusions- serious history of violence or those convicted of a sexual offence.

### **Ballymena Generic Service**

- Must live within the Ballymena and surrounding area.
- Adult service.
- Generic service.
- Referrals are accepted from;

- 
- Any statutory or voluntary agency.  
(No self referrals will be accepted)
  - Exclusions- serious history of violence or those convicted of a sexual offence.

### **Ballymoney Generic Service**

- Must live within the Ballymoney and surrounding areas.
- Adult service.
- Generic service.
- Referral accepted from:
  - Any statutory or voluntary agency.  
(No self referrals will be accepted)
- Exclusions- serious history of violence or those convicted of a sexual offence.

### **Registered Accommodation Policy**

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## **Policy**

To provide the necessary care and support to each individual in a homely environment, with facilities equipped to meet the changing needs of each individual.

### **OBJECTIVES**

- To treat each person as an individual
- To promote the individuals' views and wishes.
- Support the individuals' rights to control their lives and make informed choices about services they receive.
- Respect and maintain the dignity and privacy of the individual
- Promote equal opportunities and respect the diversity and different cultures and values.
- To ensure the Home is resourced with skilled staff to meet all of these objectives.

## **SUPPORTED EMPLOYMENT SERVICES**

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## Policy & Procedure

**REFERRAL** Referrals received and recorded in by Co-ordinator into allocation book.

- a) Referral recorded into Allocation Book and allocated by Co-ordinator to Supported Employment Officer. Supported Employment Officer to open up appropriate files. Add client to own referral checklist (to be visible for all staff). **Services Checklist** to be used in blue file and marked off accordingly.
- b) Pro-forma letter from Supported Employment Officer to referrer to acknowledge receipt of referral, informing them that the Supported Employment Process will begin with an Assessment of Need (Proforma A) and enclose the criterion for selection with a checklist to be completed and refined before process continues.
- c) When completed criterion is returned Supported Employment Officer will send out pro-forma letter (B) to client, including information pack, advising that they will be in contact within approximately 1 week to complete **Individual Needs Checklist** by telephone.
- d) Supported Employment Officer will contact client by telephone to complete **Individual Needs Checklist** (or contact the referrer if the service user has no telephone contact to arrange how the Checklist can be carried out). Supported Employment Officer will organise a date to complete a **Job Profile** at service user's home – with Co-ordinator and send pro-forma letter (C) to client to confirm time and date of **Job Profile** meeting.

### **ASSESSMENT/ VOCATIONAL**

**PROFILING** a) Co-ordinator (or another Supported Employment Officer, if Co-ordinator cannot attend) and Supported Employment Officer will complete **Job Profile Assessment** with service user in the client's home. Bring along **Individual Needs Checklist** to

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be signed and **Job Profile Form** to be completed and leave **ESF Beneficiary form** & SAE with family to complete.

At Job Profile

Meeting others and record b) Ask permission to gather further information from relevant others and record

same in Individual **Consultation Records** (see guidance notes to complete) – attach these to Job Profile. Supported Employment Officer or Co-ordinator can complete these.

c) Supported Employment Officer to arrange a social activity (i.e. going for tea/coffee) for as soon as possible to enable you to get to know the person and assess social skills (“**situational assessment**”).

d) Ask client and their family to compile a list of prospective job matches and have these ready for the planned social activity with the Supported Employment Officer.

e) Capacity Building with Supported Employment Officer to commence immediately using standard booklets.

f) Co-ordinator and Supported Employment Officer to ascertain if service user requires extended assessment, i.e. application to Volunteer Bureau for volunteering/placement.

g) Draw up **Individual Action Plan** with service user. (Copy to service user and working file).

h) If service can meet the needs of the service user, then Supported Employment Officer will compile a list of prospective job matches and **CV** (using proforma) in liaison with service user/family and give to Co-ordinator. If the service user is on full Incapacity Benefit with no Income Support, their Supported Employment Officer can encourage/support service user to look for employment via job centres, papers, local ads, etc, and give to co-ordinator.

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## JOB FINDING/

**JOB CARVING:** Role of the Co-ordinator in liaison with Supported Employment Officer. See separate guidelines (**“Strategies for Successful Selling”**).

### **JOB MATCH/:** **JOB MATCH MEETING (Refer to checklist):-** **EMPLOYER ENGAGEMENT**

- a) Supported Employment Officer will plan a Job Match Meeting at a suitable venue to include service user, referrer and carer, except in circumstances where Social Worker or significant others are required to attend. Confirm in writing using proforma letter (D). Co-ordinator to attend at discretion.
- b) Prior to this meeting the Supported Employment Officer will prepare the **Needs-Led Employment Training Plan** pro-forma record.
- c) Co-ordinator / Supported Employment Officer will facilitate the Job Match Meeting where the **“Needs-Led Employment Training Plan”** will be drawn up.
- d) Give employer copy of blank monthly employer evaluation record.
- e) Supported Employment Officer to fill in **Permitted Work (PW1)** pro-forma and post as soon as possible. Keep copy for file.
- f) Supported Employment Officer to forward a copy of **Employment Training Plan** to the client; the employer; referrer and the “named” statutory worker etc.
- g) Supported Employment Officer to forward a thank-you letter to company (Proforma E).
- h) Supported Employment Officer to ensure employer’s name is added onto list for monthly employer evaluations with Triangle admin team.
- i) **Personal Employee Profile** to be completed and kept in blue file.

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## VOCATIONAL TRAINING:

- a) Supported Employment Officer to register service user with O.C.R (only Health and Safety Unit), if agreed at Employment Training Plan after 3 months completion at work-site using relevant OCR registration forms. Client will also be registered onto OCN Training if deemed necessary during completion of Employment Training Plan.
- b) Supported Employment Officer will begin to deliver OCR and OCN assessment.
- c) If OCR/OCN completed – copy of certificate to be kept in relevant central file and copy in blue file. Original to be forwarded to client.

## INTERVENTION

**MONITORING:** a) If necessary, Supported Employment Officer will complete a **Task Schedule** at **ON/OFF JOB** commencement of Employment, complete **ESF – Individual Training Plan**.

## SUPPORT

- b) Supported Employment Officer will agree individual **Career Path** with supported employee.
- c) Supported Employment Officer will complete **Individual Monitoring Record** for each visit/telephone call. (Go to referral B).
- d) Supported Employment Officer will complete a **Significant Record** to document any significant issues arising. (Go to referral B).
- e) Supported Employment Officer will complete **Incident/Accident** forms if necessary.
- f) Supported Employment Officer will identify risks and complete **Risk Assessment Forms** in connection with workplace (including travel to/from work) and feedback to

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Co-ordinator. Co-ordinator and/or Supported Employment Officer will share the outcome (ie: risk decision) by sending through copies of **Risk Assessment** to relevant parties.

- g) Supported Employment Officer to ensure that **Career Path** is being worked through for each individual as needed and document same using pro-forma.

## **REVIEW OF JOB:**

- a) Supported Employment Officer will organise and facilitate review meetings as proposed at Job Match Meeting/or conduct same over phone. **Review Proforma** to be completed. Co-ordinator to attend at discretion.

- EVALUATION:** a) Supported Employment Officer to enable supported employee to self-evaluate their performance.
- b) Supported Employment Officer to ensure monthly **Employer Evaluations** are received and recorded in individual **Worker Performance Evaluation Charts**. All evaluations are to be retained.
- c) Ensure written traceability of any interventions you impose as a result of issues raised.
- d) If the job “closes”, Co-ordinator and/or Supported Employment Officer to complete a **Job Separation Form** and forward a copy of same to all parties involved at Job Match Meeting.

**NB: Inform Co-ordinator of any relevant changes in client’s employment/client’s needs.**

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**N.B. If employer evaluations are positive, forward a copy onto employee and social worker. If there is a significant decline on employers performance indicators, then discuss verbally with employer and propose a plan of action.**