



Habinteg Housing Association (Ulster) Ltd

CHARGING POLICIES

EQUALITY IMPACT ASSESSMENT

FINAL REPORT
FEBRUARY 2010

DRAWN UP IN ACCORDANCE WITH SECTION 75 OF THE NORTHERN IRELAND ACT 1998

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Contents

		Page
1.	Executive Summary	4
2.	Introduction	5
3.	The Policy	7
4.	Consideration of Available Data & Research	16
5.	Assessment of Impact	21
6.	Consideration of Measures to Mitigate Against Adverse Impact	23
7.	Consultation	25
8.	Next Steps	26
9.	Appendix 1 – Nicore Equality Statistics	21
	Appendix 2 – Consultee Comments pre-consultation	26
	Appendix 4 – Habinteg’s Rent Setting Policy	31
	Appendix 5 – Habinteg’s Tenancy Agreement	32

1. EXECUTIVE SUMMARY

- 1.1 Habinteg Housing Association [Ulster] Ltd 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. Habinteg Housing Association [Ulster] Ltd 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 Charging policies is:

To operate a schedule of charges for provision of services so as to cover the operating costs for the association while acting in a fair and equitable manner to the service users.

This report provides the following information:

- Background information on the equality duties and Habinteg Housing Association [Ulster] Ltd
- A description of the Association's current Charging 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.

2. INTRODUCTION

Statutory Equality Duties

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

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

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 Habinteg Housing Association [Ulster] Ltd (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. Charging policies were scheduled for assessment in year four 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 This document is a draft for consultation and contains details of the first four elements of the Equality Impact Assessment. The remaining stages will be implemented following consideration of consultation responses.

2.8 **About Habinteg Housing Association [Ulster] Ltd**

Habinteg Housing Association (Ulster) Ltd. is a registered housing Association established in 1976 subject to the provisions of the Housing Orders (NI) 1976, 1992 and 2003 and the Industrial and Provident Societies Act (NI) 1969 and 1976. In 1997 Habinteg was successfully assessed as an Investor in People organisation. In 2000, 2003, 2005 and 2009 we were successfully reassessed to the standard. In 2000 Habinteg was awarded a Charter Mark for excellence in customer services. We were successfully reassessed to Charter Mark status in 2003, 2006, 2007 and again in 2009. The quality of our standards was further reinforced with the award of the NI Housing Council Jim Speers Award for the 'Best Housing Development in Northern Ireland' for the second year running, for our innovative Ardkeen, South Belfast Scheme.

3. THE POLICY

Description of Policy

Charging policies describe the policies the Association uses to determine charges for services it provides to its service users.

Policy Aim

3.1 The aim of the Charging policies is:

To operate a schedule of charges for provision of services so as to cover the operating costs for the association while acting in a fair and equitable manner to the service users.

The scope of the charging activities covered in these policies include:

- **Rent Setting** – This is the process associations use to set the rent for their properties.
- **Service Charges** – This refers to charges levied by the association to cover expenditure on either communal services which benefit a number of tenants or those which are provided for an individual tenant or property.
- **Support Charges** – These charges relate to the cost of housing support services. They may be paid directly by an individual who is not eligible for supporting people or funded through the 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 Charges** – These charges relate to the cost of personal care provided as part of the association's service. Such charges are normally funded by the health and social care trusts; the department of health and by the individual themselves. By care support we mean personal care e.g. help with daily living tasks.
- **Rechargeable Repairs** – This refers to charges that are the responsibility of the tenant or Joint Management Partner. Such charges will be detailed in the Tenancy Agreement / Joint Management Agreement.

* 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 Charging policies are likely to be the following:

- Association Board Members and Management
- Department for Social Development (DSD)
- Health and Social Care Trusts
- Joint Management Partners
- Northern Ireland Housing Executive (NIHE)
- Ombudsman*
- Past service users
- Recognised service user groups/organisations
- Relatives and carers
- Staff
- Tenants and residents (or their legal representatives)
- Voluntary and community sector

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

The list shown at 3.2 is not exhaustive. This list is in alphabetical order.

What this EQIA does not cover

3.3 We anticipate that some aspects of Charging policies may be considered during other equality impact assessments. Whilst considered to be important by the Association, the following areas do 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 Charging policies) and communicating with the organisation

- **Complaints about Service Charges** – This was covered by the Year 1 EQIA on Complaints
- **Charging policies of a Joint Management Partner** – This is when the association provides the building but another organisation provides the support service
- **Maintenance in a Charging policy setting** – This was covered by a Year 2 EQIA
- **Reimbursement Charges** – This is when the association recovers actual expenditure which it has paid out on behalf of residents or staff e.g.
 - the association has made a purchase on behalf of a number of tenants because so they will benefit from economies of scale
 - the associations recoups the cost of the extra BUPA charge to have family members included in the scheme
- **Rent Setting for Controlled* properties** – This policy belongs to the DSD and cannot be altered by housing associations.

3.4 Charging policies are linked to Care and Support, Housing Management and Maintenance policies and processes.

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 the development of charging for services:

- Health & Personal Social Services (NI) Order 1972
- Enduring Powers of Attorney (NI) Order 1987
- Social Security Claims and Payments Regulations (NI) 1987
- Registered Homes (NI) Order 1992
- Housing Support Services (NI) Order 2002
- Health & Personal Social Services (Quality, Improvement and Regulation) (NI) Order 2003 and associated regulations
- Residential Care Homes Regulations (NI) Order 2005
- Domiciliary Care Regulations (NI) 2007

This list is not exhaustive.

3.6 In addition to charging policies generally, Habinteg Housing Association [Ulster] Ltd 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 Charging 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, in particular those where charges apply, is of high importance to S75 groups.
 - (c) Habinteg Housing Association [Ulster] Ltd also believes that its Charging 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

- 3.8 Habinteg's charging policies have been defined by the Association's Board and / or management team. They are implemented by relevant staff throughout the Association.
- 3.9 Charging policies are developed in compliance with legal requirements and agreed by Habinteg's Board and Senior Management Team.
- 3.10 Habinteg Housing Association [Ulster] Ltd is an independent voluntary organisation which provides accommodation for people with a variety of housing needs and support needs. It is a not-for-profit social economy business so any charges are formulated on the basis of the operating costs for the association.
- 3.11 Rent Setting
- Following the Housing Order (NI) 1992, which deregulated rents for new tenancies provided by housing associations, there are two different ways of setting rents.
- (a) Rents for those properties let before 16 September 1992 are based on a points system laid down by the Department for Social Development. (*These are known as Controlled rents) A property is given a number of points depending on its age, type, number and size of rooms and facilities such as heating. Rents are then

calculated on a value per point as set by the Department. Rents are reviewed each April.

- (b) Rents for all properties let after 16 September 1992 are based on a broadly similar points system as above, however the rents are then calculated on a value per point which is determined by the Board of the association. In addition to the above, the Association must consider the need to cover the cost of management and maintenance and the requirement to make provision for future repairs and to ensure loan charges from private sources are paid. The points value is reviewed on an annual basis (and increased in April) after considering the total running costs to be recovered together with the other objectives outlined above.

While the points value determined by the Board remains distinct from that determined by the DSD each association aims to set economic rents that are within benchmarks / guidance set by the DSD, and:

- are affordable for people on low incomes, or in receipt of welfare benefits,
- provide sufficient income to enable the Association to manage, maintain, repair and improve its properties and to meet its financial commitments to lenders.

The weekly rent payable by each tenant will be broadly based on the number of points for their dwelling multiplied by the appropriate rent value per point. For new developments a discretionary increase may be applied.

Notes:

1. For re-lets in schemes originally let before 16 September 1992, the rents will be determined by using the association's value per point rather than the DSD's points value.
2. Habinteg's **Rent Setting Policy** is detailed at **Appendix 4**

3.12 Service Charges

Habinteg Housing Association [Ulster] Ltd applies charges for expenditure on services that benefit a number of tenants, for example, heating communal areas, maintaining the safety of shared equipment or providing window cleaning for an apartment block. Such charges are apportioned between all tenants who benefit from the service and may vary depending of the type of accommodation. At Habinteg Housing Association [Ulster] Ltd these include the following:

- maintenance and servicing of:-
 - boilers
 - CCTV

-
- communal heating and lighting systems
 - door entry systems
 - emergency lighting
 - fire alarms and extinguishers
 - laundry equipment
 - lift
 - sewage pumps / system
 - provision of:-
 - communal cleaning
 - communal coin operated telephones
 - communal grounds maintenance
 - Community Assistant/Concierge
 - heating & lighting
 - insurance
 - line rental (lifts / fire alarms / CCTV)
 - payphone / broadband (line rental)
 - white goods (replacement cost of items supplied by association)
 - window cleaning

Charges may also be applied for maintenance and servicing of equipment or in relation to a service that is provided for a particular individual, for example, a lift or bath hoist.

Services charges may be applicable to former tenants who have purchased their property. In such cases (usually apartment blocks) the service charge may include further items such as:

- contribution towards sinking fund
- maintenance of guttering and drainage systems
- redecoration - external and communal areas
- renewal of floor coverings to common areas
- replacement of communal equipment e.g. lift
- Community Assistant charges

3.13 Housing Support

In Habinteg Housing Association [Ulster] Ltd charges applied for Housing Support services relate to a range of activities including some or all of the following:

- arranging activities for tenants
- giving general counselling
- making daily calls
- offering help with benefits
- providing advice and support – including emergency out of hours call outs

3.14 Rechargeable Repairs

These are costs which are the responsibility of tenants such as replacement of glass in broken windows, repairs to locks or as a result of damage caused by the tenant, their family or visitors. Full details of these obligations are listed in Habinteg Housing Association [Ulster] Ltd's **Tenancy Agreement** which is shown at **Appendix 5**

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 Charging policy policies:

- a) Targeted pre-consultation meetings with representative bodies held during June – July 2009 as part of the joint exercise co-ordinated by NIFHA
A general pre-consultation exercise co-ordinated by NIFHA during July 2009
- b) Reports from the NICORE Database
- c) The Association's internal management information on the profile of tenants and service users
- d) NIFHA benchmarking
- e) Annual Regulatory Returns
- f) Qualitative Feedback from association staff
- g) Habinteg Housing Association [Ulster] Ltd's Customer Satisfaction Surveys
- h) Complaints and compliments relating to Charging policies
- i) Feedback from Disability Action and the Women's Support Network was received following consultation and will be adapted where possible.

Pre-consultation data collection

4.2 Volunteers from NIFHA's Forum groups held targeted preliminary consultation sessions were held with a number of representative organisations. Participants included Carers NI, Disability Action, Gingerbread, Multi-Cultural Resource Centre. Their comments are listed at Appendix 2.

4.3 Invitations were also made to and apologies received from the Age Concern / Help the Aged, NIHE, the political spokespersons of the Alliance, Democratic Unionist, Ulster Unionist, Sinn Fein, Social Democratic and Labour Parties.

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- 4.4 NIFHA also invited all 142 organisations listed at **Appendix 3** to participate in the **pre-consultation** using the policy documentation provided on www.nifha.org. Interested organisations and individuals were asked to review the policy information and consider the following three issues:
- Do you agree with our assessment of impacts?
 - In terms of the group you represent have we missed anything?
 - Is there anything we could do to improve this policy for the group you represent?
- 4.5 Feedback from Disability Action and the Women's Support Network was received following consultation and will be adapted where possible.

Profile of Service Users

- 4.6 The principal sources of equality information about tenants are tenant surveys and NICORE lettings statistics. Appendix 1 gives a statistical breakdown of housing association tenants based on information in the NICORE database. The **Northern Ireland COntinuous REcording** of new lettings records and analyses the socio-economic characteristics of new housing association tenants in relation to property size and rent level of their new homes.

New tenants are asked to provide information on the composition and socio-economic circumstances of their households whilst the housing associations add data on the property to be rented and the reason for housing the new tenant. As NICORE information is collected on a face-to-face basis it is not appropriate to ask for personal details in relation to all nine Section 75 groups. This information remains totally confidential and is entirely used for research purposes.

NIFHA is responsible for co-ordinating this survey, inputting the data onto a computerised data-base and providing periodic reports to all housing associations. The datasets shown for General Needs, Sheltered and Supported housing cover seven of the S75 categories.

- 4.7 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.
- 4.8 The Association's tenant base for new lettings for the period April 2008 - September 2009, in relation to seven of the nine Section 75 Categories is as follows:
- **Age of head of household**

16-24	23%
25-34	32%
35-44	13%
45-59	16%
60-74	14%
75+	3%

- **Dependents**

Yes	53%
No	47%

- **Disability**

Yes	23%
No	77%

- **Gender**

Male	31%
Female	69%

- **Marital Status**

Married	15%
Unmarried	59%
Divorced	7%
Widowed	5%
Separated	13%

- **Racial Group**

White	98%
Mixed Ethnicity	1%
Other	1%

- **Religious Belief**

Protestant	24%
Catholic	72%
Other	1%
No religious belief	3%

Complaints

4.9 As stated at 3.3 the overall handling of complaints was dealt with in a previous EQIA. However, for the period April 2007 – April 2009 the Association:

- 1 complaint about its Charging policy service but none indicated adverse impact resulting from these policies

Ombudsman Report

4.10 There have been no complaints where Habinteg Housing Association [Ulster] Ltd was found to be at fault by the Ombudsman in relation to the Charging policy practices of this association.

5. ASSESSMENT OF IMPACT

5.1 This section outlines our assessment of the impact of the Association's Charging policies on the 9 Section 75 groups based on the evidence considered above. It is our preliminary view there are few adverse impacts that are directly related to the Charging policies.

5.2 We also feel it is important to state that the very nature of some charging policies will bring a certain amount of adverse (financial) impact as they apply to a certain group of people for example those who need support services. However, these charges arise from the service received by the person and in most cases are calculated on the basis of the cost of provision of a service or for maintenance to / services in a property which benefit all tenants.

5.3 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. We welcome any information which helps us to identify adverse impacts.

6. CONSIDERATION OF MEASURES TO MITIGATE AGAINST ADVERSE IMPACT

The following are options that potentially could mitigate adverse impact arising from the association's Charging policies:

- Provision of information in alternative formats where appropriate so tenants of all abilities and from all backgrounds can understand how charges are calculated
- Include questions in tenant surveys to enable ongoing identification of the impact of charging policies
- Lobby for consistency of approach from Health Trusts
- Gather information on tenants who do not receive Housing Benefit or Supporting People monies and if appropriate lobby the NIHE on this issue.

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- Consider tenant recharges for write off where the tenant is vulnerable and is genuinely not in a position to clear the debt
 - Review energy saving measures to reduce heating charges
 - Offer debt counselling and benefit advice to those experiencing financial difficulties

7. CONSULTATION

7.1 Habinteg Housing Association [Ulster] Ltd has endeavoured to give careful consideration to the measures that might be taken to make the Charging policy most efficient, effective and equitable. The measures outlined in section 6 are not intended to be definitive or exhaustive. The Association formally consulted on its findings over a 12 week period and welcomed feedback from Disability Action and the Women's Support Network to assist us in improving the policy.

7.2 Habinteg Housing Association [Ulster] Ltd will ensure that it consults effectively with those groups directly affected by its Charging policy policies, and their representatives.

7.3 Staff will be available to discuss these proposals in person, by telephone, or by e-mail, as requested. Meetings may also be arranged to discuss the way forward and the Equality Impacts of this document, if required.

7.4 The period of consultation ended on Friday 18 December 2009

7.5 Comments in relation to this report should be submitted in writing to:

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Telephone: 028 9042 7211
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email: equality@habinteg-ulster.co.uk

7.6 Comments in any other format will also be accepted.

7.7 If you require any further information, you may contact the Association using the contact details given in 7.5.

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- 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

T: 028 9023 0446

E: equality@nifha.org

W: www.nifha.org

8. NEXT STEPS

- 8.1 Habinteg Housing Association [Ulster] Ltd will seriously consider all comments received from Disability Action and the Women's Support Network.
- 8.2 Alternative formats are available on request.
- 8.3 A system will be established to ensure the ongoing monitoring of the impact of the policy on relevant groups.

Appendix 1

NICORE Equality Statistics

NEW LETTINGS – 2008/9, 2007/08, 2006/07

Table 1 – Mainstream

Table 2 – Sheltered

Table 3 – Supported

Table 4 – Mainstream, Sheltered & Supported

Table 1 - Mainstream Schemes

	2008/09 (Prov)	2007/08	2006/07
Age of Head of Household			
16 - 24	28.9%	28.1%	28.9%
25 - 34	27.6%	28.4%	26.0%
35 - 44	19.2%	19.8%	19.4%
45 - 59	15.2%	15.0%	16.1%
60 - 74	7.0%	7.2%	7.2%
75 plus	2.2%	1.5%	2.4%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	43.1%	42.7%	47.3%
A person with a disability	5.1%	6.3%	6.7%
An elderly person	1.1%	1.7%	1.6%
Head of Household with Disability			
Yes	20.4%	24.2%	22.3%
No	79.6%	75.8%	77.7%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	38.5%	39.6%	38.4%
Female	61.5%	60.4%	61.6%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	11.7%	11.6%	11.0%
Unmarried	67.4%	66.1%	64.9%
Separated	11.4%	11.8%	11.4%
Divorced	6.1%	7.0%	8.4%
Widowed	3.3%	3.5%	4.3%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	96.2%	97.1%	98.1%
Irish Traveller	0.7%	0.3%	0.3%
Chinese	0.5%	1.1%	0.5%
Indian	0.3%	0.1%	0.1%
Pakistani	0.0%	0.0%	0.0%
Bangladeshi	0.0%	0.0%	0.0%
Black Caribbean	0.2%	0.1%	0.2%
Black African	0.6%	0.3%	0.4%
Black Other	0.2%	0.0%	0.0%
Mixed	0.5%	0.5%	0.2%
Other	0.8%	0.5%	0.2%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	31.9%	34.2%	36.6%
Catholic	57.1%	55.5%	56.0%
Mixed	0.5%	0.5%	0.3%
Hindu	0.0%	0.0%	0.1%
Jewish	0.0%	0.0%	0.0%
Sikh	0.1%	0.0%	0.0%
Islam	0.1%	0.2%	0.2%
Bhuddist	0.0%	0.1%	0.0%
Orthodox	0.0%	0.0%	0.0%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	3.6%	3.1%	1.9%
No religious belief	6.8%	6.4%	4.9%
TOTAL	100.0%	100.0%	100.0%

Table 2 - Sheltered Schemes

	2008/09 (Prov)	2007/08	2006/07
Age of Head of Household			
16 - 24	0.3%	0.3%	1.2%
25 - 34	0.5%	0.5%	0.4%
35 - 44	1.1%	1.1%	1.3%
45 - 59	15.0%	14.0%	13.1%
60 - 74	42.2%	44.3%	40.9%
75 plus	40.9%	39.8%	43.1%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	0.0%	0.0%	0.0%
A person with a disability	1.0%	2.1%	1.9%
An elderly person	0.8%	1.0%	1.2%
Head of Household with Disability			
Yes	32.9%	35.2%	30.8%
No	67.1%	64.8%	69.2%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	45.8%	49.0%	44.7%
Female	54.2%	51.0%	55.3%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	13.4%	15.4%	11.3%
Unmarried	22.5%	22.4%	23.7%
Separated	11.0%	9.9%	8.5%
Divorced	8.3%	8.8%	9.7%
Widowed	44.8%	43.5%	46.9%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	99.6%	99.6%	99.5%
Irish Traveller	0.0%	0.0%	0.0%
Chinese	0.3%	0.4%	0.3%
Indian	0.0%	0.0%	0.1%
Pakistani	0.0%	0.0%	0.0%
Bangladeshi	0.0%	0.0%	0.0%
Black Carribean	0.0%	0.0%	0.0%
Black African	0.0%	0.0%	0.0%
Black Other	0.0%	0.0%	0.0%
Mixed	0.1%	0.0%	0.1%
Other	0.0%	0.0%	0.0%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	60.6%	59.2%	62.7%
Catholic	31.1%	34.0%	31.2%
Mixed	0.1%	0.7%	0.1%
Hindu	0.0%	0.0%	0.1%
Jewish	0.0%	0.0%	0.1%
Sikh	0.0%	0.0%	0.0%
Islam	0.0%	0.0%	0.1%
Bhuddist	0.0%	0.0%	0.0%
Orthodox	0.0%	0.0%	0.1%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	3.3%	3.1%	2.2%
No religious belief	4.9%	3.0%	3.4%
TOTAL	100.0%	100.0%	100.0%

Table 3 - Supported Schemes

	2008/09 (P)	2007/08	2006/07
Age of Head of Household			
16 - 24	32.9%	31.7%	32.3%
25 - 34	20.0%	21.1%	21.3%
35 - 44	18.6%	16.6%	17.6%
45 - 59	16.1%	16.2%	15.7%
60 - 74	3.7%	5.2%	4.6%
75 plus	8.8%	9.1%	8.6%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	15.2%	15.7%	12.6%
A person with a disability	0.8%	0.9%	0.6%
An elderly person	0.2%	0.2%	0.2%
Head of Household with Disability			
Yes	36.8%	45.6%	37.2%
No	63.2%	54.4%	62.8%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	49.5%	44.3%	48.7%
Female	50.5%	55.7%	51.3%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	8.5%	9.3%	8.6%
Unmarried	70.0%	68.4%	70.4%
Separated	9.9%	10.0%	8.3%
Divorced	4.4%	4.2%	7.9%
Widowed	7.1%	8.0%	4.8%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	95.3%	95.4%	97.1%
Irish Traveller	1.9%	2.1%	1.3%
Chinese	0.4%	0.4%	0.2%
Indian	0.0%	0.2%	0.1%
Pakistani	0.0%	0.2%	0.1%
Bangladeshi	0.0%	0.0%	0.0%
Black Caribbean	0.1%	0.1%	0.1%
Black African	0.7%	0.3%	0.4%
Black Other	0.1%	0.2%	0.2%
Mixed	0.4%	0.2%	0.2%
Other	1.0%	1.0%	0.3%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	43.8%	40.8%	42.1%
Catholic	47.9%	48.1%	49.0%
Mixed	0.0%	0.2%	0.2%
Hindu	0.0%	0.0%	0.0%
Jewish	0.0%	0.0%	0.0%
Sikh	0.0%	0.0%	0.0%
Islam	0.0%	0.2%	0.3%
Bhuddist	0.0%	0.0%	0.0%
Orthodox	0.0%	0.0%	0.0%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	2.3%	3.9%	2.3%
No religious belief	6.0%	6.7%	6.1%
TOTAL	100.0%	100.0%	100.0%

Table 4 - Mainstream, Sheltered & Supported Schemes

	2008/09 (Prov)	2007/08	2006/07
Age of Head of Household			
16 - 24	25.4%	25.2%	26.4%
25 - 34	19.4%	20.7%	20.0%
35 - 44	15.6%	15.4%	15.9%
45 - 59	15.6%	15.4%	15.4%
60 - 74	12.0%	12.3%	10.9%
75 plus	12.1%	10.9%	11.3%
TOTAL	100.0%	100.0%	100.0%
Caring Responsibilities of Head of Household			
For children	23.5%	24.3%	23.9%
A person with a disability	2.6%	3.3%	3.1%
An elderly person	0.7%	1.0%	0.9%
Head of Household with Disability			
Yes	29.6%	35.1%	30.6%
No	70.4%	64.9%	69.4%
TOTAL	100.0%	100.0%	100.0%
Gender of Head of Household			
Male	44.6%	43.1%	44.2%
Female	55.4%	56.9%	55.8%
TOTAL	100.0%	100.0%	100.0%
Marital Status			
Married	10.7%	11.2%	9.9%
Unmarried	60.5%	60.2%	61.4%
Separated	10.7%	10.7%	9.5%
Divorced	5.8%	6.1%	8.4%
Widowed	12.4%	11.8%	10.8%
TOTAL	100.0%	100.0%	100.0%
Ethnicity of Household			
White	96.4%	96.8%	97.8%
Irish Traveller	1.1%	1.0%	0.8%
Chinese	0.4%	0.7%	0.3%
Indian	0.1%	0.1%	0.1%
Pakistani	0.0%	0.1%	0.1%
Bangladeshi	0.0%	0.0%	0.0%
Black Carribean	0.1%	0.1%	0.1%
Black African	0.6%	0.3%	0.3%
Black Other	0.1%	0.1%	0.1%
Mixed	0.4%	0.3%	0.2%
Other	0.7%	0.6%	0.2%
TOTAL	100.0%	100.0%	100.0%
Community to which Household Belongs			
Protestant	42.4%	41.1%	43.0%
Catholic	48.3%	48.8%	49.0%
Mixed	0.2%	0.4%	0.2%
Hindu	0.0%	0.0%	0.1%
Jewish	0.0%	0.0%	0.0%
Sikh	0.0%	0.0%	0.0%
Islam	0.1%	0.2%	0.2%
Bhuddist	0.0%	0.1%	0.0%
Orthodox	0.0%	0.0%	0.0%
Falun Gong	0.0%	0.0%	0.0%
Other not stated	3.0%	3.5%	2.1%
No religious belief	6.1%	6.0%	5.2%
TOTAL	100.0%	100.0%	100.0%

Appendix 2: Consultee comments pre-consultation

Organisation	Summary of comments received	Association's response
Carers NI	It is useful to have more detailed explanation of actual policies	
	More interested in Support and Care charges – looking for fairness and consistency	
	Would like to see consistency across HAs and within HA as well as with the regime in the community – aware this is difficult as not always within control of HA	
	Attendance and DLA should not be used to pay support / car	
	Practice in Health Trusts may vary but the policy should be the same	
	Welcomes EQIA on Charging policies and attempt to be as consistent as is possible in the current operational circumstances	
	Slight concern about blanket charging as this assumes there will be equal impact which is not always the case	
	If someone wants support through a Trust they are assessed and if accepted a financial assessment is done and the service provided. How do HAs determine who gets service or what is required?	
	Assumptions about individual income should not be made on the basis of household income. Person may only get Carers Allowance of £53 pw - their income is generally much smaller proportionate to household figure.	
	If disabled person has a carer living with and supporting them then carer is providing a lot of service free but disabled person is still being charged	
Disability Action (DA)	The relationship between poverty and disability and age must be drawn in the EQIA	
	The preferred term is refuge alarm not "disabled" refuge alarm in 3.12	Has been amended as requested
	Issues such as Affordability need to be specifically addressed	
Organisation	Summary of comments received	Association's response

	There is no section on Consultation with tenants specifically in accessible ways	
Gingerbread	Did not comment specifically on the Charging policies but shared general information relating to lone parents	
	Useful Statistics <ul style="list-style-type: none"> • 25% of families are headed by lone parents • 92,000 lone parent families in N Ireland, incorporating 150,000 children • 90% of lone parents are lone mothers • 56% of lone parents are in work 	
Multi-Cultural Resource Centre (MCRC)	Charging policies are not the problem – MCRC felt the policy as detailed would not cause adverse impact for those of different races	
	Real issue for people from different countries is getting onto NIHE list so they can be housed – need to be in a hostel first to achieve this.	
	Perception that Asylum Seekers get prioritised but they do not.	
	Same problems as everyone else plus communications	
	Difficulty is getting deposits, securities and references	
	Rents are high which impacts on those who have to pay top up	
	Private rents are high compared to social housing	
	People from other countries who have travelled here to work are often at the lower end of economy so affordability is a real issue	
	Suggested improvements: <ul style="list-style-type: none"> • Communications • Network and support • Help and sign-posting for accessing systems / knowledge • Some unaware that benefits exist 	
	Some people may be wary of trusting any government systems	

Appendix 3 – Equality Consultation List

Revised July 2009

Age Concern Northern Ireland
Age Sector Platform
Alliance Party for Northern Ireland
Amalgamated Engineering & Electrical Union
Amalgamated Transport & General Workers Union
An Munia Tober
Antrim Borough Council
Ards Borough Council
Armagh District Council
Association of Independent Advice Centres
Bahai Council for Northern Ireland
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Barnardos
Belfast City Council
Belfast Health & Social Services Board
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Trade Unions Council
Brainwaves Northern Ireland
British Deaf Association (NI)
Carafriend
Carers Northern Ireland
Carrickfergus Borough Council
Castlereagh Borough Council
Central Services Agency
Chartered Institute of Housing
Child Poverty Action Group (NI)
Children's Law Centre
Chinese Welfare Association
Citizens Advice Regional Office (Belfast)
CO3 Chief Officers Third Sector
Coalition on Sexual Orientation (CoSO)
Coleraine Borough Council
Committee on the Administration of Justice (CAJ)
Community Development & Health Network (NI)
Community Relations Council (CRC)
Cookstown District Council
Council for the Homeless (NI)
Craigavon Borough Council
Democratic Unionist Party
Department for Social Development
Derry City Council
Derry Well Woman

Disability Action, Belfast
Disability Action, Derry
Down District Council
Down's Syndrome Association
Dungannon & South Tyrone District Council
East Belfast Community Development Agency
Eastern Health & Social Services Board
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh District Council
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Help the Aged Northern Ireland
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Larne Borough Council
Lesbian Line
Limavady District Council
Lisburn Borough Council
Magherafelt District Council
Magherafelt Women's Group
MENCAP
Methodist Church in Ireland
Mind Yourself
Moyle District Council
Multi-Cultural Resource Centre
Newtownabbey Borough Council
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
North Down Borough Council
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Care Trust
Northern Health & Social Services Board
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health
Northern Ireland Committee for Refugees & Asylum Seekers (NICRAS)
Northern Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Housing Council
Northern Ireland Housing Executive
Northern Ireland Human Rights Commission (NIHRC)

Northern Ireland Mixed Marriage Association
Northern Ireland Office
Northern Ireland Women's Aid Federation
Northern Ireland Women's European Platform (NIWEP)
Northern Ireland Youth Forum
NUS USI
Office of the First Minister & Deputy First Minister
Omagh District Council
Omagh Women's Area Network
Parents & Professionals & Autism
POBAL
Polish Welfare Association
PRAXIS
Press for Change
Probation Board for Northern Ireland
Progressive Unionist Party
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
SEEDS
Sense NI
Simon Community
Sinn Fein
Social Democratic & Labour Party
Southern Health & Social Care Trust
Southern Health & Social Services Board
Staff Commission for Education & Library Boards
Strabane District Council
Supporting Communities NI
The Cedar Foundation
The Guide Dogs for the Blind Association
The Rainbow Project
The Women's Centre
Traveller Movement Northern Ireland
UCATT
Ulster Democratic Party
Ulster Scots Heritage Council
Ulster Unionist Party
Western Health & Social Care Trust
Western Health & Social Services Board
Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency (WRDA)
Women's Support Network
Workers Party
Youth Action
Youth Council for NI

RENT SETTING POLICY

With the introduction of new legislation, the Association is no longer able to set its rents by the same method for all its tenants. The Association sets rents in four different ways, depending on circumstances. The Association is fully committed to ensuring that rent levels on our developments are affordable to low paid employees, which is also a commitment of the Tenants' Guarantee.

1. DWELLINGS LET BEFORE 16 SEPTEMBER 1992

These rents are set by the Department for Social Development for housing associations and the Housing Executive, and are calculated on a points system based on the type of dwelling.

2. DWELLINGS IN SCHEMES WHICH ARE BEING BUILT PARTLY WITH GOVERNMENT GRANTS AND PARTLY WITH LOANS RAISED BY THE ASSOCIATION

These are termed "mixed funded" schemes and the Association sets its own rents for these dwellings. As it has to cover extra costs the rents may be higher than those charged under the points scheme. The rent is calculated to cover the following elements.-

- Loan repayment
- Management costs
- Routine maintenance costs
- Major repairs costs
- Allowance for voids

The Association seeks to set affordable rents and so keep them within the reach of those with low incomes. Rents can only be increased once in any 12 month period. In deciding how much should be paid for one house when compared with another, the Association considers size and amenities as defined by the points scheme.

3. DWELLINGS BEING RE-LET AFTER 16 SEPTEMBER 1992 WHICH WERE NOT MIXED FUNDED

The Association sets its own rent levels for these dwellings. It seeks, as far as possible, to maintain parity with rent levels under the rent points scheme. The Association increases all its rents in April each year and endeavours to keep percentage increase levels in line with [1] above.

4. HOSTEL DEVELOPMENTS

The Association sets its own monthly charge levels for these developments. These charges are based on the requirement that Habinteg's revenue costs in providing these facilities are fully covered. Hence, the charge covers both management and maintenance costs, as well as any long term loan repayments that relate to the project. The charge is set, and increased annually, with reference to the Department for Social Development's hostel management and maintenance allowances.

TENANCY AGREEMENT

This is a four weekly Tenancy Agreement made on theday ofbetween.....of..... (“The Tenant”) and HABINTEG HOUSING ASSOCIATION (ULSTER) LIMITED of 22 Hibernia Street, Holywood BT18 9JE (“The Association”) as Landlord. These two parties have rights and obligations under this agreement and mutual responsibilities in respect of the upkeep and standard of the estate. The Association is a Housing Association registered under the Housing Order (NI) 1976 and Industrial and Provident Societies Acts (NI) 1969 and 1976.

The Address of the premises covered by this Agreement is (“The Premises”) and the commencement of the tenancy is Monday theof

It is a secure tenancy*/It is an introductory tenancy*.

*Housing Officer to delete as appropriate.

If you are an Introductory Tenant, you will become a secure tenant on theday of20....., provided the Association has not issued legal proceedings against you for possession of the “Dwelling” or the tenancy has not otherwise ceased to be an introductory tenancy by virtue of the provisions of the Housing [NI] Order 2003.

The Rent of £..... per week is exclusive of heating, lighting and all rates and it is payable fortnightly in advance. The total inclusive payments to be made weekly are shown in the schedule at the bottom of this Agreement.

The charges referred to in the schedule for services (if any) can be reviewed annually, and can be adjusted when there is an increase reasonably incurred by the Association. Any increase in service charges can be passed on, in full, annually. Any variation to the service charge will be apportioned equitably between all dwellings and the amounts referred to in the schedule shall be amended accordingly.

Support charges (if applicable) cover the cost of the provision of support costs, e.g. general support and counselling.

The Association will give four weeks notice, in writing, before putting any increase into effect.

The tenancy can be terminated by either the Tenant or the Association. Four weeks written notice must be given by either party.

You may be entitled to Housing Benefit to help with payment of your rent. If you are not sure whether you qualify, please contact the local NIHE Office who deal with Housing Benefit for Housing Association tenants.

1 RESPONSIBILITIES OF THE TENANT

The tenant agrees to:-

- (a) Pay the rent on a Monday fortnightly in advance.
- (b) Pay all rates and other outgoings including service charge (if any) and support charges (if any) in respect of the premises.
- (c) Give access to the Association or its agents at reasonable times during the day.
- (d) Keep any garden which is the responsibility of the tenant in good tidy order.
- (e) Insure possessions, furniture, fixtures and fittings kept in the premises against fire or other accidental damage.
- (f) Vacate the premises if informed by the Association that this is necessary for repair or rehabilitation of the premises, as long as the Association provides suitable alternative accommodation.
- (g) Vacate the premises if there is no longer a disabled member of the family occupying a dwelling specifically designed for the disabled, as long as suitable alternative accommodation can be provided by a recognised housing authority.
- (h) Pay for the repair of any damage done to the premises not due to ordinary wear and tear to a standard approved by the Association.
- (i) Leave the premises in good repair, decoration and condition at the end of the tenancy.
- (j) Keep the interior of the premises, including fixtures and fittings provided by the Association, in good repair throughout the duration of the tenancy.

The tenant agrees not to:-

- (a) Assign the premises or part with possession or sub-let the whole of the premises.
- (b) Sub-let or part with possession of part of the premises without the written consent of the Association; this consent will not be unreasonably withheld.
- (c) Undertake any repairs, alterations, additions or improvements to the premises without first obtaining written consent from the Association.
- (d) Affix or attach any object, including radio and television aerials, to the exterior of the premises without obtaining the prior consent, in writing, of the Association.
- (e) Erect any structure on the garden, if any, without obtaining the prior consent of the Association, or to alter the planting scheme in any strip of garden between demarcation markers and the roadway.
- (f) Cause any disturbance or nuisance, or allow any other occupant to cause any disturbance or nuisance which will be an annoyance to neighbours.
- (g) Use the premises for business purposes (or for any other than residential).
- (h) Park any commercial or trade vehicle on the road or parking spaces of the estate.
- (i) Keep pets on the premises without obtaining the prior consent in writing from the Association.

3 RESPONSIBILITIES OF THE ASSOCIATION

The Association agrees to:-

- (a) Provide such caretaking, gardening, lighting and cleaning services in relation to communal areas of the estate (if any) as it considers necessary and as far as possible to efficiently maintain such services.
- (b) Maintain and keep in good repair the structure and exterior of the premises.
- (c) Keep in repair and working order all pipes for the supply of water, central heating and for sanitation and all cables for supply of electricity.
- (d) Insure the property against loss or damage by fire and such other risks covered by a normal insurance policy as the Association shall decide.
- (e) Consult with the tenants on matters of management, maintenance, improvements or demolition of dwellings on the estate owned by the Association and on the provisions of services or amenities for the estate where these matters are not included in rent payments or charges for services.
- (f) Provide information on allocations, transfers and exchange procedures.

The Association agrees not to interfere with the Tenant's right to peaceful and proper enjoyment of the premises, as long as the Tenant complies with his responsibilities under this Agreement.

5 RIGHTS OF THE ASSOCIATION

- (a) The Association reserves the right to add to or vary the terms and conditions set out in this Agreement. In the event of any such variation the Association will serve a preliminary notice inviting the Tenant's observations, and after consideration of these observations a further notice may be served after which the variation will come into effect.
- (b) The Association reserves the right to enter on the premises for the purpose of rebuilding or executing repairs or alterations to the premises or any adjoining premises or for the purpose of repairing or maintaining the channels, sewers, drains, watercourses, pipes and cables belonging to or running through, under or over the premises making good all damage to the premises thereby caused.

6 BREACH OF TENANCY CONDITIONS

If the rent is not paid within 14 days of the due date (whether formally demanded or not) the Association may after thorough investigation of the circumstances begin legal proceedings to recover the rent and/or re-possess the premises.

If any breach of this Agreement (including any variation) takes place, the Association may, if after contact with the Tenant the breach is not remedied, serve him, her or them with a Notice Seeking Possession.

I/We accept the tenancy in accordance with the conditions set out in this Agreement.

SCHEDULE

Rent	£ _____ per week	Or such sum as shall be determined by the Department for Social Development.
Rates	£ _____ per week	Or such sum as shall be determined by the Department for Social Development (Rating Division).
Service Charge	£ _____ per week	
Support Charge	£ _____ per week	
Heating	£ _____ per week	
TOTAL	£ _____ per week =====	

Signed on behalf of the Association

In the presence of

Signed by the tenant

In the presence of
