

THE NORTHERN IRELAND FEDERATION OF HOUSING ASSOCIATIONS

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Policy and Development Division
Equality Commission for Northern Ireland
Equality House
7-9 Shaftesbury Square
Belfast
BT2 7DP

Dear Sir or Madam

Re: Section 75 Monitoring Guidance

I refer to the Equality Commission for Northern Ireland's (ECNI) consultation document entitled Section 75 Monitoring Guidance for Use by Public Authorities

The Northern Ireland Federation of Housing Associations (NIFHA) represents 44 independent voluntary organisations, which benefit the community by providing affordable accommodation and related housing services to those in greatest housing need. Taken together, our members manage almost 30,000 units of accommodation and build over 1,500 dwellings each year throughout Northern Ireland. In the last twenty-five years housing associations have undertaken a range of projects in response to the needs of a diverse society including the provision of accommodation and services for those within specific s75 groups.

On behalf of our members, NIFHA welcomes the document and would like to add the following comments to those we raised when participating in your public consultation event:

1. Our member associations are generally positive about Section 75 and would wish to adhere to the ECNI's recommendations on monitoring.
2. We believe it is vital that the definitions and classifications used are harmonised if the information gathered is to be used for benchmarking or comparison purposes – this should not be just within sectors such as housing but also across sectors.
3. Housing associations cannot collect information about applicants as this is gathered via the Housing Selection Scheme, operated by the NIHE – associations only begin to record information once an allocation has been made to a housing association property. The current Northern Ireland

Housing Executive's 'PRAWL' system does not facilitate data sharing from a monitoring perspective.

4. Currently, associations gather information about new tenants at the point of allocation and this covers 7 of the 9 Section 75 categories, however as this data collection is carried out on a face-to-face basis we would not consider it appropriate to include questions on sexual orientation or political opinion in this process. Our members would welcome suggestions on how to manage the process so that we:
 - Meet the requirements of s75 and the ECNI
 - Do not diminish the effectiveness of the current data collection system known as NICORE (The Northern Ireland **C**ontinuous **R**ecording 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).
5. It can be difficult for associations to monitor a changing customer base when tenants may leave without the knowledge of the organisation, so an exit survey is not always possible. The alternative of keeping a record of the s75 categories of each tenant presents data protection issues around confidentiality and privacy. We would welcome advice on this matter.
6. More clarification is needed in relation to some of the categories listed in the guidance for example:
 - Community background, religious belief;
 - The 'Ethnic group' category also presents problems particularly if the option 'white' is used as this may mask problems, like racist incidents;
 - 'Political opinion' is also problematic if researchers have to rely on the narrow party preferences we are offered in Northern Ireland as this may not reflect the political views of the respondents.

On a more general note, although the Commission may have wanted to avoid prescription and to enable designated bodies to shape their monitoring data to the needs of their own organisation the end result is a guidance document that offers so much choice is it becomes confusing rather than helpful.

I am pleased to be able to contribute to this process on behalf of the registered housing associations and hope you will find these comments useful. If you have any queries about any of the points raised or require further information about the Federation and its member associations please do not hesitate to contact me.

Yours faithfully

LUCINDA McMURRAN
Corporate Services Manager