

Date: 13 December 2011
Consultation: NILGOSC Equality Scheme, Audit of Inequalities and Action Plan

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide around 36,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org.

Background

In September 2011 NILGOSC began a consultation on its revised Equality Scheme together with its Audit of Inequalities and associated Action Plan for 2012-2015. A number of NIFHA's member associations are members of the Local Government Pension Scheme which is administered by NILGOSC.

General Comments

NIFHA appreciates the opportunity to comment on this important consultation which has relevance both for its own staff and for member housing associations.

Specific Comments

NILGOSC Equality Scheme 2011

We consider this document to be helpful and informative. We have only one minor comment which is in relation to consultation arrangements. We suggest that in addition to issuing a press release when the Equality Scheme is approved by the Commission, NILGOSC could also publish this information on its website.

NILGOSC Audit of Inequalities

We welcome this work and commend the effort that has gone into it however we are disappointed by the lack of statistical data in the document. We are concerned that assumptions in relation to potential inequalities have been made on this basis. We are also concerned at reliance on the 2001 Census which is no longer considered to offer robust data given the passage of time since the information was collected.

For a number of the 'Inequalities Identified' in section 5.1 of the Key findings it was not always easy to understand some of the comments made. Examples include the following statements:

- "Ill health regulations potentially favour individuals with a disability"
- "Tiered employee contributions rates favour those on lower pay scales who are more likely to be female"

In both these cases it could be argued that these arrangements are in place to redress inequality. We suggest more detailed information on how these elements of the scheme offer benefit to particular equality groups would help clarify the conclusions drawn.

As a result of this situation it was often difficult to see how the issues highlighted in the Audit translated into actions aimed at addressing the inequalities identified by the NILGOSC team.

Action Plan

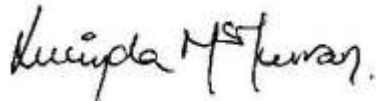
NIFHA agrees that it is important to mainstream equality throughout the organisation and accepts that approaching the task by functional area is a useful method for achieving this objective.

We welcome the positive actions outlined in the proposed action plan. However, we consider the most important of these would be to address known inequalities in the Pension Administration Regulations. As a consequence we believe this particular action should take priority over all the other items listed as it has the greatest potential to result in better equality of opportunity.

Conclusion

I am pleased to submit this response on behalf of NIFHA and trust you will find our comments helpful. If you require further information on any of the points raised in this response please do not hesitate to contact me.

Submitted on behalf of NIFHA by:



Lucinda McMurrin
Corporate Services Manager