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>

To: <equality.bill@ofmdfmi.gov.uk>
Subject: Single Equality Bill Consultation

12/11/2004 16:04

Please find attached NIFHA's response to the above consultation.

Regards

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SEB Response 12.11.04.dc

THE NORTHERN IRELAND FEDERATION OF HOUSING ASSOCIATIONS

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11 November 2004

Single Equality Bill Team
Office of the First Minister & Deputy First Minister
Room E.3.18
FREEPOST NAT 17679
Belfast
BT4 3BR

Dear Sir or Madam

Re: Single Equality Bill Consultation Document

I refer to the Office of the First Minister and Deputy First Minister's consultation document entitled A Single Equality Bill for Northern Ireland.

The Northern Ireland Federation of Housing Associations (NIFHA) represents 45 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 dwellings and build over a 1000 each year. In the last twenty-five years these associations have undertaken a range of projects to respond to the needs of a diverse society. This pro-active approach to service provision is continuing, as is our commitment to equality of opportunity in other areas such as the workplace.

NIFHA commends the Office of the First Minister and Deputy First Minister for addressing this issue and welcomes the opportunity to contribute to the consultative process. The Federation and its members recognise the benefits of having a Single Equality Bill that provides a clear and accessible framework of anti-discrimination and equality law for Northern Ireland by addressing unlawful discrimination and promoting equality. As housing practitioners we also support the aim of dealing with inconsistencies as this should make it easier for members who have to work with the various pieces of existing legislation. Furthermore, our members are committed to the equality process as a part of our work to promote the values and good practice of housing associations. However, as voluntary organisations recently designated under of Section 75 of the Northern Ireland Act 1998 we have concerns about how some of the proposals would work in practice.

Chapter 4 - Scope

Extending the scope of the EC Directives

Would the proposal to extend the scope of current anti-discrimination legislation to include “access to and supply of goods and services, which are available to the public, including housing” mean that housing associations, as the main providers of new social housing, would automatically be treated as public bodies?

This could be problematic if it is combined with the proposal to promote equality proactively through the use of affirmative action as with Section 75. While housing associations are committed to minimising the inequalities in our society, and are supportive of the aims of the Single Equality Bill, we have concerns about them being classed as “public bodies” because this would contradict their voluntary, independent status. Secondly, we have reservations about placing onerous duties on what in some cases are very small organisations. Finally, we have genuine concerns about the capacity of some of our members to effectively implement such requirements without any additional resources being made available. Therefore, we urge the government to take full account of these issues of principle and practicality when progressing the development of this Bill.

On behalf of our members I am pleased to be able to contribute to this process and would welcome further dialogue with the Office of the First Minister and Deputy First Minister to discuss some of the issues we have highlighted in greater detail.

Yours faithfully

Chris Williamson

CHRIS WILLIAMSON
Director