

POLICY SCREENING FORM

Background

Under Section 75 of the Northern Ireland Act 1998, the College is required 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;**
- **between men and women generally;**
- **between persons with a disability and persons without; and,**
- **between persons with dependants and persons without.**

Without prejudice to the obligations set out above, the College is also required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

Screening

The screening procedure should lead to one of two conclusions:

- The policy being screened does not have a significant impact on equality of opportunity and therefore does not require an EQIA
- The policy being screened has (or is likely to have) a significant impact on equality of opportunity and may require an EQIA.

Scoping the Policy

Title of Policy:	Complaints Policy & Procedures (v9) – Sept. 2025
Policy Aim:	The aim of this policy is to provide the Association's Officers (employees) with procedural guidance to follow when processing complaints received by the Association.
Policy Ref:	F&CS004
Brief Description:	<p>Via this policy, the Association will endeavour to ensure its systems and procedures are adequate to meet current guidance from the Northern Ireland Public Service Ombudsman Office (NIPSO).</p> <p>The Association will investigate and respond to any complaint raised by an applicant for re-housing or a tenant or service agreement holder, particularly where allegations seek to show unreasonable delay, bias, failure to follow proper procedures or a decision badly made.</p>

Who defines or defined the policy?

Newington's Board of Management is responsible for defining, approving and amending this document, which must reflect current legal and legislative guidance or requirements.

All employees of the Association must abide by these requirements.

The Board and Chief Executive Officer will mainly define this policy.

Who implements the policy?

Newington Housing Association employees will implement this policy.

Is the policy applied uniformly throughout the organisation? *If NO, what are the consequences*

Yes

Who are the main stakeholders in relation to the policy?

The main stakeholders are identified as NHA board members, staff, tenants, service agreement holders, applicants for re-housing, legislative and statutory bodies, Apex HA and any other relevant stakeholders not listed.

What factors/forces could contribute/detract from the aim or implementation of the policy?

None

How do we interface with other bodies in relation to implementation of this policy?

We interface with other bodies in relation to implementation of this policy via our day-to-day operational activities and through internal audits, reporting and regulatory requirements.

Which other policies are related to this policy?

This policy lies within our CEO's Directorate and is overseen and reviewed by the appointed CEO. There are no other associated policies.

What data is currently available to facilitate the screening of this policy?

N/A

Answering the Four Screening Questions

The four questions ask for evidence in relation to the Section 75 dimensions. You should not think of the "don't know" column in the form as the easy option to respond to any of the questions. In cases where you don't know and you don't have data, you will need to make a judgement based on experience as to whether the policy you are screening may have an impact on any of the nine dimensions. If your judgement is that the policy may have a differential adverse impact in relation to any of the Section 75 dimensions (i.e. it affects some groups differently and less favourably than other groups), you should seek to obtain evidence. You should note that evidence can be qualitative – i.e. drawn from the experience of individuals from their perspective - as well as quantitative. Officers must give consideration to steps that they could reasonably be expected to take to obtain evidence and thereby inform their decision-making. Such steps could include meeting with a representative group or selective consultation.

Where there is little or no evidence, and common sense indicates that a differential impact may be expected, you should discuss this with the Equality Officer.

1. Is there any evidence of higher or lower participation or uptake by different groups?

	Yes	No	Not known
Religious belief		X	
Political opinion		X	
Racial group		X	
Age		X	
Marital status		X	
Sexual orientation		X	
Gender		X	
Disability		X	
Dependency		X	

Please comment: N/A

2. Do different groups have different needs, experiences, issues and priorities in relation to this policy issue?

	Yes	No	Not known
Religious belief		X	
Political opinion		X	
Racial group		X	
Age		X	
Marital status		X	
Sexual orientation		X	
Gender		X	
Disability		X	
Dependency		X	

Please comment: N/A

3. Have consultations with relevant groups, organisations or individuals indicated that policies of this type create problems that are specific to them?

	Yes	No
Religious belief		X
Political opinion		X
Racial group		X
Age		X
Marital status		X
Sexual orientation		X
Gender		X
Disability		X
Dependency		X

This policy was developed to ensure that systems, processes and internal procedures are in place to ensure adherence to all legislative and legal guidance and requirements, when carrying out the processing, investigation and responding to all complaints received.

By doing so, it provides assurances that Newington's activities in respect of complaint handling are carried out promptly; in a fair, equitable and consistent manner.

4. In relation to implementing this policy, is there an opportunity to better promote equality of opportunity or good relations by altering the policy or by working with others in Government or in the larger community?

Yes No

5. With reference to Questions 1 to 4 please summarise how you believe the policy may impact on the organisation's obligation to have due regard to the need to promote equality of opportunity.

We do not believe the policy impacts on the organisation's obligation to have due regard to the need to promote equality of opportunity.

6. What data do you believe will be required to ensure effective monitoring of the policy following implementation?

Via the completion and recording of all relevant complaints handling information and data, which are regularly reported on to our Board and to the Department for Communities.

7. In the context of Question 3 are there any relevant groups which you believe should be consulted at this time? Please specify

There are no relevant groups which we believe should be consulted at this time.

8. Any other comments on the policy and/or screening exercise?

No

9. On the basis of answers to Questions 1 to 4 above (and in particular positive answers), do you recommend that the policy should be subjected to a full impact assessment?

Yes

No

Please elaborate

Newington Housing Association Policy Screening Outcome

Is this a new policy?

No

If yes, confirm the date on which the policy was screened in relation to opportunity of equality & promotion of good relations?

N/A

If this is a review of an existing policy – have there been significant changes.

Yes, but no significant changes have been made to the previous version which would have an impact on equality of opportunity. Many of the changes reflect new procedural changes and timeframes for the processing of complaints, which mirror new guidance currently being consulted upon by the NIPSO and is due for implementation during 2026.

If yes, confirm the date on which the policy was screened in relation to opportunity of equality & promotion of good relations?

15th September 2025

**N.B. If an EQIA is recommended, please continue and complete an EQIA.
If an EQIA is not recommended, please sign and date this form and ensure that
the reason for not recommending is made clear.**

Policy Screening Decision

**The policy that has screened does not have a significant impact on equality of opportunity and
therefore does not require an EQIA.**

Screened by: Glenn Ashfield Date: 15/09/2025

Approved by: Anthony Kerr Date: 15/09/2025
