

POLICY SCREENING FORM

Background

Under Section 75 of the Northern Ireland Act 1998, the Association 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 dependents and persons without.**

Without prejudice to the obligations set out above, the Association 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: Newington Housing Association's GDPR & Data Protection Policy - V3 - (May 24)

Policy Ref: F&CSGDPR - 7.0 & 7.1 to 7.1.12

Policy Aim: To outline the Association's approach to meet all legislative requirements arising from the GDPR and Data Protection Act 2018.

Brief Description: This policy and associated documents outlines the Association's approach to ensuring we meet all legislative requirements arising from the GDPR and Data Protection Act 2018 and provides the guiding principles and responsibilities to ensure the Association's anti-virus/malware objectives are met.

Who defines or defined the policy?

The Association's Board of Management, CEO, Heads of Departments and staff have defined the policy.

Who implements the policy?

Newington Housing Association will implement this policy.

Is the policy applied uniformly throughout the organisation? If no, what are the consequences.

Yes

Below is a list of all associated policies relating to Newington's GDPR Documentation & Guidance Notes (May 2024):

- NHA Privacy Policy (Policy Ref: 7.1.1)
- NHA Data Retention Periods (Policy Ref: 7.1.2)
- NHA Fair Processing Notice (Policy Ref: 7.1.3)
- NHA Personal Data Map (Policy Ref: 7.1.4)
- NHA Employee Fair Processing Notice (Policy Ref: 7.1.5)
- NHA Contract of Employment Data Protection Clause (Policy Ref: 7.1.6)
- NHA Data Protection Addendum (Policy Ref: 7.1.7)
- NHA Data Sharing Agreement (Policy Ref: 7.1.8)

Who are the main stakeholders in relation to the policy?

The main stakeholder is the Association, all current and future employees, tenants, stakeholders and any other third parties' who engage or provide/share data or information with the Association (i.e. Data Processors or data Controllers).

NHA consider itself primarily to be a “Data Controller” and must therefore take the necessary steps to meet its new legislation requirements under GDPR.

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

There are no factors/forces identified which could contribute/detract from the aim or implementation of the policy.

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

Newington may liaise with tenants, community partners, stakeholders, statutory agencies or appointed third parties (i.e., such as our IT Service providers, external software suppliers, etc.) to assist in the implementation of this policy and all its relevant procedures.

Which other policies are related to this policy?

All policies used by the Association will relate to this policy in some form or another, as the General Data Protection Regulations impacts all areas of our business.

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

None

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:

Affects all groups, service users and across all areas of the business.

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:

Used uniformly throughout the organisation.

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

Please comment:

N/A

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

Please elaborate:

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.

Newington's GDPR & Data Protection Policy (May 2024) has been developed in accordance with the below non-exhaustive summary of the legislation and regulatory obligations that contribute to the formation of this policy:

- Computer Misuse Act 1990
- Freedom of Information Act 2002 Northern Ireland
- Safeguarding Vulnerable Groups (Northern Ireland) Order 2007
- Section 75 of the Northern Ireland Act 1998
- Protection of Children and Vulnerable Adults (NI) Order 2003
- Human Rights Act 1998
- Obscene Publications Act 1959 and 1964

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

The Association's Board, Chief Executive Officer (CEO) and Senior Management Team (SMT) and Staff are accountable for the effective implementation of this policy within the Association.

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

No

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.

No

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

28th May 2024

**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

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

Screened by: *Martin Hamilton*

Date: 28/05/2024

Approved by: *Glenn Ashfield*

Date: 28/05/2024
