

# **POLICY SCREENING FORM**

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## **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

<b>Title of Policy:</b>	Tenancy Fraud Policy (v2) – (May 2024)
<b>Policy Aim:</b>	<p>At all times, Newington Housing aims to ensure that best use is made of its housing stock, therefore we will effectively eliminate opportunities for fraudulent activity by having appropriate arrangements and controls in place. This will enable Newington to target more resources at providing quality and affordable accommodation, care and support.</p> <p>Newington's Tenancy Fraud Policy aims to prevent, detect and act where tenancy fraud is suspected.</p> <p>The objectives of the policy are:</p> <ul style="list-style-type: none"><li>• To raise awareness to assist with the prevention, detection and actioning of tenancy fraud.</li><li>• To ensure training, support and guidance is provided to prevent, detect and action tenancy fraud</li></ul>
<b>Brief Description:</b>	<p>Newington Housing Association will seek to take all appropriate measures available to it to safeguard and ensure the proper use of funds for which it has responsibility and control of.</p> <p>Tenancy Fraud is one form Newington is exposed to and given its responsibilities regarding the provision of social housing for those in greatest need, Newington is committed to preventing, detecting and tackling tenancy fraud to ensure best use is made of its housing stock.</p> <p>With demand for social housing increasingly outstripping supply, if tenancy fraud is not addressed, it can impact negatively on the provision of housing to those in genuine need. Newington will therefore implement its Tenancy Fraud Strategy, associated Action Plan and Policy to prevent tenancy fraud and, where it arises, ensure that it is addressed, so that best use is made of its housing stock.</p>

### Who defines or defined the policy?

The policy has been developed in line with the Department for Communities guidance and reflects our regulatory requirements to ensure we investigate all

instances of suspected or actual Tenancy Fraud in a considerate, responsive, effective and legal way.

**Who implements the policy?**

Newington Housing Association will implement this policy. All other Registered Social Landlords (i.e., NIHE and other HA's within NI) all operate a Tenant Fraud Policy to help prevent and tackle instances of suspected or actual Tenancy Fraud, as and when they arise.

**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 the Association, our tenants, NIHE, DfC, DWP/SSA, PSNI and all other relevant statutory agencies.

**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 other statutory agencies/systems to assist in its investigation.

NHA will also liaise with NIHE (H/B), DWP (U/C) or other Social Security Agencies, if the tenant of the abandoned dwelling is in receipt of financial assistance towards the payment of housing costs.

NHA has a regulatory duty to inform the Dept. for Communities, where we have initiated an investigation of suspected or actual Tenancy Fraud.

**Which other policies are related to this policy?**

- Fraud Strategy and Action Plan
- GDPR and Data Protection Policy
- Lone Working Policy

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

We hold records of all suspected or actual Tenancy Fraud cases investigated by us.

### **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?**

	<b>Yes</b>	<b>No</b>	<b>Not known</b>
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:

There is no evidence to suggest this Policy has a higher or lower impact on certain Section 75 Groups. Our records indicate that previous investigations of Tenancy Fraud (although very limited in numbers) have been from a wide variety of household types, over the past few years.

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

	<b>Yes</b>	<b>No</b>	<b>Not known</b>
<b>Religious belief</b>		x	
<b>Political opinion</b>		x	
<b>Racial group</b>		x	
<b>Age</b>		x	

<b>Marital status</b>		X	
<b>Sexual orientation</b>		X	
<b>Gender</b>		X	
<b>Disability</b>		X	
<b>Dependency</b>		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?**

	<b>Yes</b>	<b>No</b>
<b>Religious belief</b>		X
<b>Political opinion</b>		X
<b>Racial group</b>		X
<b>Age</b>		X
<b>Marital status</b>		X
<b>Sexual orientation</b>		X
<b>Gender</b>		X
<b>Disability</b>		X
<b>Dependency</b>		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.**

This policy is based on regulatory guidance issued to all RSL's within N.I and must adhere to all associated Housing (NI) Orders.

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

The Association compiles a Tenancy Fraud Register and records information relating to all investigations carried out and the final outcomes.

**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

No EQIA is required as it does not impact unfairly on any individual group and provides a platform to ensure fairness and equality for all.

## 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?

(Not applicable)

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

Yes, it is a review of an existing policy, but no significant changes have been made to the previous policy.

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

24<sup>th</sup> 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.**

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### Policy Screening Decision

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

Screened by:

*Jacqui Gilmore*

Date: 24/05/2024

Approved by:

Anthony Kerr

Date: 24/05/2024

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