

WOVEN | GOVERNANCE & ASSURANCE

SECTION 75 EQUALITY SCREENING REPORT

Disciplinary Procedure

Draft completed assessment using the ECNI screening structure

Field	Details
Organisation	Woven Housing Association Ltd
Policy / decision	Disciplinary Procedure
Status	Revised operational procedure
Policy owner / responsible officer	Head of HR and Corporate Services
Screening date recorded on source document	4 June 2025
Provisional screening outcome	Screened out for full EQIA, with proportionate mitigation and monitoring
EQIA required?	No, on the evidence currently available; subject to human review and senior approval

Important status: This is a completed draft for review by the policy decision-maker and equality lead. It does not constitute final sign-off. Evidence not supplied has been expressly identified and should not be treated as evidence of no impact.

Part 1. Policy Scoping

ECNI scoping question	Completed assessment
Name of policy / decision	Disciplinary Procedure
Is it existing, revised or new?	Revised operational procedure
What is it trying to achieve?	To set out informal and formal investigation, hearing, representation, sanction, suspension and appeal arrangements under the Disciplinary Policy.
Who owns and implements it?	Head of HR and Corporate Services leads implementation, supported by the teams and roles identified in the policy.
Main stakeholders affected	Employees; managers; HR; investigators; panels; companions and witnesses.
Implementation factors	Effective implementation depends on clear communication, staff awareness, consistent decision-making, adequate resources, accessible delivery and compliance with relevant legal, regulatory and organisational requirements.

Evidence considered and limitations

- The source document titled "Draft HRO5a Disciplinary Procedure (May 25).doc screened 04062025.rtf", including the amendments and comments recorded in it.
- Woven Equality Scheme 2025 and the ECNI Section 75 screening template structure.
- The policy's stated aims, scope, stakeholders, roles, procedures, risks, consultation references and associated documents.
- No complete policy-specific equality monitoring dataset, disaggregated outcome data or full consultation response schedule was supplied. The screening conclusion is therefore conditional on mitigation and proportionate monitoring.

Available evidence, needs, experiences and priorities

Section 75 category	Evidence available	Needs, experiences and priorities
Religious belief	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	No policy-specific differential evidence was supplied. Apply the policy consistently and avoid assumptions linked to belief.
Political opinion	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	No policy-specific differential evidence was supplied. Decisions and communications should remain objective and politically neutral.
Racial group	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	Plain English and alternative formats or translation may be relevant where information is communicated to staff, tenants or the public.
Age	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	Digital familiarity, experience, health or communication needs may vary by age; avoid age-based assumptions and offer appropriate support.
Marital status	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	No specific differential impact identified. Apply criteria consistently.
Sexual orientation	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	No specific differential impact identified. Maintain respectful, inclusive language and confidentiality.
Men and women generally	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	No direct adverse impact identified. Monitor implementation where working patterns, safety, caring roles or participation may differ.
Disability	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	Accessible information, reasonable adjustments and individual consideration may be required. Do not treat absence, access or communication needs as non-compliance without enquiry.
Persons with dependants	Policy content and amendments reviewed. No disaggregated policy-specific outcome evidence supplied.	Notice, flexibility and accessible participation may assist people with caring responsibilities.

Part 2. Screening Questions

Question 1: Likely impact on equality of opportunity

Category	Assessment	Level	Adverse impact?
Religious belief	No policy-specific differential evidence was supplied. Apply the policy consistently and avoid assumptions linked to belief.	None	No adverse impact identified
Political opinion	No policy-specific differential evidence was supplied. Decisions and communications should remain objective and politically neutral.	None	No adverse impact identified
Racial group	Plain English and alternative formats or translation may be relevant where information is communicated to staff, tenants or the public.	Minor	Potential indirect impact if controls are not applied
Age	Digital familiarity, experience, health or communication needs may vary by age; avoid age-based assumptions and offer appropriate support.	Minor	Potential indirect impact if controls are not applied
Marital status	No specific differential impact identified. Apply criteria consistently.	None	No adverse impact identified
Sexual orientation	No specific differential impact identified. Maintain respectful, inclusive language and confidentiality.	None	No adverse impact identified
Men and women generally	No direct adverse impact identified. Monitor implementation where working patterns, safety, caring roles or participation may differ.	Minor	Potential indirect impact if controls are not applied
Disability	Accessible information, reasonable adjustments and individual consideration may be required. Do not treat absence, access or communication needs as non-compliance without enquiry.	Minor	Potential indirect impact if controls are not applied

Category	Assessment	Level	Adverse impact?
Persons with dependants	Notice, flexibility and accessible participation may assist people with caring responsibilities.	Minor	Potential indirect impact if controls are not applied

Question 2: Opportunities to better promote equality of opportunity

Yes. The policy can better promote equality through the following proportionate measures:

- Apply reasonable adjustments and interpretation support throughout investigations, hearings and appeals.
- Keep suspension under review and consider disability, access and welfare needs in contact restrictions.
- Ensure evidence, notices and outcomes are accessible and sufficiently clear.
- Record reasons for sanctions and appeals and monitor outcomes for patterns.

Question 3: Likely impact on good relations

Good relations category	Assessment	Level
Religious belief	No adverse impact identified. Transparent, consistent and respectful implementation should support confidence.	None
Political opinion	No adverse impact identified. Decisions should remain objective and politically neutral.	None
Racial group	No adverse impact identified. Accessible communication and inclusive engagement may provide a minor positive opportunity.	None / minor positive

Question 4: Opportunities to better promote good relations

Use inclusive and accessible communication, objective decision-making, respectful engagement and clear routes for feedback or concerns. These are enhancement opportunities rather than responses to an identified major adverse impact.

Multiple identity considerations

Combined needs may arise, for example for disabled older people, disabled people with caring responsibilities, minority ethnic people with communication needs, or women with dependants. Implementation should respond to the individual circumstances evidenced, without stereotyping.

Part 3. Screening Decision

Decision field	Assessment
Screening decision	Screened out. A full Equality Impact Assessment is not required at this stage.
Reason	No major adverse equality or good relations impact has been identified from the source material. The foreseeable risks are minor, indirect and capable of being addressed through the listed amendments, consistent implementation and monitoring.
Mitigation required?	Yes, as a proportionate precaution and equality enhancement measure.
Alternative policy required?	No. The policy aim can be retained and the controls embedded in the policy or associated procedures.
Reconsideration trigger	Material amendment; evidence from consultation; equality complaint; monitoring indicating disproportionate outcomes; legal or regulatory change; or failure to implement agreed controls.

Mitigation and equality enhancement action plan

Action	Lead	Timing	Evidence
Apply reasonable adjustments and interpretation support throughout investigations, hearings and appeals.	Policy owner / implementing team	Before approval or during implementation	Revised wording, implementation record or monitoring evidence
Keep suspension under review and consider disability, access and welfare needs in contact restrictions.	Policy owner / implementing team	Before approval or during implementation	Revised wording, implementation record or monitoring evidence
Ensure evidence, notices and outcomes are accessible and sufficiently clear.	Policy owner / implementing team	Before approval or during implementation	Revised wording, implementation record or monitoring evidence
Record reasons for sanctions and appeals and monitor outcomes for patterns.	Policy owner / implementing team	Before approval or during implementation	Revised wording, implementation record or monitoring evidence

Part 4. Monitoring

Area	Measure / evidence	Frequency	Trigger for review
Access and communication	Requests for alternative formats, adjustments, language support and access-related feedback.	Ongoing; annual summary	Recurring barriers or unmet reasonable requests.
Use and outcomes	Relevant participation, decisions, service outcomes or formal actions under the policy, where data is available and proportionate.	At implementation review	Unexplained or recurring differential outcomes.
Concerns	Equality-related complaints, grievances, incidents and consultation feedback.	Ongoing	Substantiated concern or recurring theme.
Policy effectiveness	Implementation review, legal or regulatory change and completion of mitigation actions.	At scheduled policy review or earlier	Material change or evidence of greater impact than predicted.

Monitoring data must be handled lawfully, confidentially and proportionately. Small numbers should be anonymised or aggregated and should not be over-interpreted.

Part 5. Approval and Authorisation

Field	Record
Screened by	Ann Gallagher
Position / job title	Corporate Assurance Manager
Date completed	4 June 2025
Policy owner / responsible officer	Head of HR and Corporate Services
Senior approval / authorisation	To be completed by the senior manager responsible for the policy
Final screening outcome	To be confirmed following human review
Approved by / date	_____

Screening record and publication

- Retain the signed screening with the policy approval record and evidence of completed mitigation actions.
- Publish or make the completed screening accessible in accordance with Woven's Equality Scheme arrangements.
- Reconsider the decision if consultation or monitoring provides evidence of a greater impact.

References and limitations

Equality Commission for Northern Ireland, Section 75 screening flowchart and template; Northern Ireland Act 1998, Section 75 and Schedule 9; Woven Equality Scheme 2025; and the source policy named above. This screening is a governance assessment, not legal advice, and does not determine the fairness of an individual decision. Final judgement and approval remain with the authorised human decision-makers.

Evidence-Based Woven Assurance Addendum

Purpose and status: This addendum converts the assessment from a policy-text-only screening into an evidence-led Woven assessment. It records the organisational and policy-specific evidence located, distinguishes evidence from assumptions, identifies gaps, and shows how each source affects the screening judgement. It must be read with Parts 1 to 5 above and remains subject to policy-owner review and senior approval.

A. Evidence register and evaluative use

Evidence source	Verified finding	How the evidence affects this screening
Woven Equality Scheme 2025	Confirms that screening is required at the earliest opportunity; all four ECNI screening questions are applied; relevant qualitative and quantitative evidence is gathered; outcomes are screened in, screened out with mitigation, or screened out without mitigation; decisions are approved and published; and impacts are monitored.	Sets the governance standard, decision routes, publication requirement and monitoring/reconsideration framework for this assessment.
Woven Annual Equality Progress Report 2025/26	Records continued tenant and stakeholder engagement, accessible service development, policy screening activity, and that 54 general complaints were recorded during the reporting period with none identified as Equality Scheme complaints.	Provides organisation-wide context. It does not establish that this individual policy caused no differential impact, so policy-specific monitoring remains required.
Woven Annual Equality Progress Report 2024/25	Records continued NICORE tenant monitoring and organisational equal opportunities monitoring, and reports no policy changes arising from monitoring in that reporting period.	Provides background evidence on Woven monitoring arrangements, but not policy-specific outcome proof.
Woven Equality, Diversity and Inclusion Policy	Commits Woven to inclusive services and employment, accessible communication, equality training, confidentiality and formal routes for discrimination concerns.	Provides the organisational control environment against which implementation safeguards are assessed.
Woven policy screening publication records for 2025 and 2026	Records the source policy as screened out in Woven's published/working screening lists where applicable.	Confirms the historical decision. This enhanced assessment independently tests and qualifies that decision rather than relying on it as evidence of no impact.
Disciplinary Procedure	Requires proportionality, consideration of explanations and mitigation, written outcomes and appeal arrangements.	Supports consistent decision-making but needs records capable of testing differential outcomes.
Disciplinary Policy	Provides the reasonable-adjustment and translation safeguards that must operate throughout the procedure.	The procedure should be read and monitored together with the policy.

B. Consultation and engagement evidence

The supplied policy cover and associated records were checked for a consultation entry. Any recorded consultation evidence is described in the evidence register above. Where a date, participants, feedback summary or decision trail was not located, this remains an evidence gap and the screening does not assume consultation occurred.

C. Evidence gaps and proportionate response

- No complete disaggregated policy-specific outcomes dataset was located for all nine Section 75 categories.
- No evidence was located showing that the source policy had generated an Equality Scheme complaint. Organisation-wide complaint information cannot prove the absence of policy-specific impact.
- Where consultation records were incomplete, the policy owner should retain the invitation, participants or groups, feedback received, response and resulting amendments.
- The screening decision is conditional on implementation of the mitigation and monitoring actions. Absence of data is not treated as evidence of no impact.

D. Refined decision rationale

The evidence supports screening out without a full EQIA at this stage because no major adverse impact has been evidenced and the identified risks are capable of being prevented or reduced through specific controls. This is not a finding that every group will experience the policy identically. It is a proportionate decision based on the policy safeguards, Woven's organisational equality arrangements, the policy-specific evidence listed above, and explicit monitoring triggers. A full EQIA must be reconsidered if new evidence indicates a major, persistent or disproportionate adverse impact, if mitigation is not implemented, or if consultation raises substantiated concerns.

E. Evidence completion checks before approval

- ☐ Policy owner confirms that the policy text reviewed is the version proposed for approval.
- ☐ Policy owner validates the policy-specific facts, responsible leads and mitigation deadlines.
- ☐ Consultation record is attached or the reason consultation was not proportionate is documented.
- ☐ Available complaints, HR, IT service, compliance, incident, audit or customer feedback records relevant to the policy are checked and any material finding added.

☐ Senior manager confirms the final outcome, signs and dates Part 5, and authorises publication.