

WOVEN | GOVERNANCE & ASSURANCE
SECTION 75 EQUALITY SCREENING REPORT
Conflicts of Interests Policy

Field	Details
Organisation	Woven Housing Association Ltd
Policy / decision	Conflicts of Interests Policy
Status	Revised governance policy
Policy owner / responsible officer	Chief Executive / Chairperson
Screening date recorded on source document	16 July 2025
Provisional screening outcome	Screened out for full EQIA, with proportionate mitigation and monitoring
EQIA required?	No, on the evidence currently available.

Part 1. Policy Scoping

ECNI scoping question	Completed assessment
Name of policy / decision	Conflicts of Interests Policy
Is it existing, revised or new?	Revised governance policy
What is it trying to achieve?	To explain conflicts of interest, require prompt declarations, establish registers and meeting controls, and protect integrity, impartiality and public trust.
Who owns and implements it?	Chief Executive / Chairperson leads implementation, supported by the teams and roles identified in the policy.
Main stakeholders affected	Staff; Board and Committee Members; candidates; tenants; suppliers and contractors.
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.

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.

Section 75 category	Evidence available	Needs, experiences and priorities
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.	Minor	Potential indirect impact if controls are not applied
Political opinion	No policy-specific differential evidence was supplied. Decisions and communications should remain objective and politically neutral.	Minor	Potential indirect impact if controls are not applied
Racial group	Plain English and alternative formats or translation may be relevant where information is communicated to staff, tenants or the public.	None	No adverse impact identified
Age	Digital familiarity, experience, health or communication needs may vary by age; avoid age-based assumptions and offer appropriate support.	None	No adverse impact identified
Marital status	No specific differential impact identified. Apply criteria consistently.	Minor	Potential indirect impact if controls are not applied

Category	Assessment	Level	Adverse impact?
Sexual orientation	No specific differential impact identified. Maintain respectful, inclusive language and confidentiality.	Minor	Potential indirect impact if controls are not applied
Men and women generally	No direct adverse impact identified. Monitor implementation where working patterns, safety, caring roles or participation may differ.	None	No adverse impact identified
Disability	Accessible information, reasonable adjustments and individual consideration may be required. Do not treat absence, access or communication needs as non-compliance without enquiry.	None	No adverse impact identified
Persons with dependants	Notice, flexibility and accessible participation may assist people with caring responsibilities.	None	No adverse impact identified

Question 2: Opportunities to better promote equality of opportunity

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

- Use inclusive definitions of close personal relationships and neutral, gender-inclusive language.
- Collect only information necessary to identify and manage a conflict and restrict access appropriately.
- Assess declared interests consistently, document decisions and avoid assumptions based on protected characteristics.
- Publish or disclose register information only in line with governance and data protection requirements.

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

Good relations category	Assessment	Level
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
Use inclusive definitions of close personal relationships and neutral, gender-inclusive language.	Policy owner / implementing team	Before approval or during implementation	Revised wording, implementation record or monitoring evidence
Collect only information necessary to identify and manage a conflict and restrict access appropriately.	Policy owner / implementing team	Before approval or during implementation	Revised wording, implementation record or monitoring evidence
Assess declared interests consistently, document decisions and avoid assumptions based on protected characteristics.	Policy owner / implementing team	Before approval or during implementation	Revised wording, implementation record or monitoring evidence
Publish or disclose register information only in line with governance and data protection requirements.	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.

Area	Measure / evidence	Frequency	Trigger for review
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.

Part 5. Approval and Authorisation

Field	Record
Screened by	Ann Gallagher
Position / job title	Corporate Assurance Manager
Date completed	16 July 2025
Policy owner / responsible officer	Chief Executive / Chairperson
Senior approval / authorisation	Board
Approved by / date	Board / 20/08/2025