

Woven Housing Association

SECTION 75 EQUALITY SCREENING REPORT

Energy Performance Certificate Policy

Public authority	Woven Housing Association Ltd
Policy area	Asset management / energy efficiency
Screening date	28/07/2025

Screening conclusion

SCREENED OUT WITH MITIGATION AND MONITORING

1. Policy profile

Screening question	Evidence-based assessment
What is the policy/procedure intended to achieve?	To ensure valid EPCs are obtained, managed and communicated and to support legal compliance, energy efficiency, carbon reduction and tenant wellbeing.
Who is affected?	Tenants, prospective tenants, leaseholders where applicable, staff, contractors and consultants across Woven's housing stock and commercial properties.
Who implements it?	Board and Chief Executive, Asset Management and Compliance leads, repairs staff, housing staff, accredited assessors, contractors and tenants.
Geographical scope	Woven operations and services in Northern Ireland.
Relationship to other arrangements	Capital investment arrangements, asset data systems, retrofit programmes and energy performance legislation.

2. Evidence and information considered

This screening assessment is based on the content of the policy or procedure supplied, its stated scope, duties, decision points, safeguards and monitoring arrangements. The assessment also applies Woven's Equality Scheme commitments and the ECNI screening questions. No unsupported demographic assumptions have been used.

- The policy applies to residential properties owned, managed or let and also refers to commercial property.
- It requires EPC data management, communication with tenants and energy efficiency improvement activity.
- Tenant responsibilities include allowing access and engaging with advice; staff coordinate surveys and retrofit works.

3. Policy aims and equality relevance

Energy performance can affect heating costs, comfort and health. Although the policy is property-based, implementation may affect groups differently because of disability, age, income, language, household composition, caring responsibilities and ability to provide access.

4. Assessment of impacts on Section 75 groups

Section 75 category	Assessment of likely impact	Level
Religious belief	No differential treatment is specified. Apply consistently and avoid scheduling or communication practices that create avoidable barriers.	None
Political opinion	No political criterion or differential treatment is specified. Decisions should remain objective and evidence-based.	None
Racial group	Language barriers may affect understanding of EPC information, appointments or retrofit advice.	Minor
Age	Older tenants may be more vulnerable to cold homes or require additional support to understand or use new heating systems.	Minor
Marital status	No differential impact identified.	None
Sexual orientation	No differential impact identified. Confidentiality and respectful treatment remain relevant.	None
Men and women generally	No direct criterion differentiates by sex, but household circumstances and caring roles may affect experience of works; monitor feedback.	Minor

Section 75 category	Assessment of likely impact	Level
Disability	Some disabled tenants may be more affected by cold, require specific temperatures, need accessible communications, or require adjustments for surveys and works.	Minor
Dependants	Households with children or caring responsibilities may need flexible appointments and careful management of disruption.	Minor

5. Multiple identity and intersectional considerations

A disabled older tenant, a family with young children, or a tenant with limited English may experience greater effects from cold, disruption, unfamiliar equipment or access arrangements.

6. Good relations

Fair prioritisation and clear communication about investment decisions can reduce perceptions of unequal treatment between schemes or communities.

7. Opportunities to better promote equality of opportunity

- Provide EPC and energy advice in plain language and alternative formats.
- Build reasonable adjustments and vulnerability information into appointment and works planning, using only necessary data.
- Use tenant feedback after major retrofit works to improve communication and support.
- Ensure investment prioritisation is transparent and evidence-based.

8. Mitigation and safeguards

Potential issue	Mitigation / safeguard	Responsibility / evidence
Communication barriers	Provide clear appointment information, contact routes, translation and accessible formats where needed.	Compliance / Housing teams
Disruption from inspections or works	Offer reasonable appointment flexibility and record agreed adjustments.	Contractors / Housing teams
Differential vulnerability to cold or new systems	Provide tailored instructions and refer tenants to appropriate support within Woven's remit.	Asset / Housing teams

Potential issue	Mitigation / safeguard	Responsibility / evidence
Perceived unfairness in investment priorities	Apply published, property-based criteria consistently and explain decisions.	Asset Management

9. Screening decision

Decision: Screened out without an Equality Impact Assessment (EQIA), subject to the mitigation and monitoring actions in this report.

The policy has a legitimate compliance and sustainability aim and may produce positive outcomes. No major adverse impact is evident. Minor differential effects may arise in access, communication, disruption and vulnerability to cold, which are capable of mitigation.

Screening question	Evidence-based assessment
Major impact?	No evidence of a major adverse impact has been identified.
Minor impact?	Potential minor or differential impacts are capable of being addressed through reasonable adjustments, accessible communication, consistent decision-making and monitoring.
No impact?	For categories not specifically engaged by the subject matter, the provisions are neutral and apply consistently.
EQIA required?	No, on the evidence currently available. Re-screen if monitoring identifies an unmitigated adverse impact or if the policy changes materially.

10. Monitoring and review

- Monitor failed access, complaints and satisfaction by relevant equality characteristics where data is available and proportionate.
- Review whether communication and adjustments are effective during EPC and retrofit programmes.
- Monitor outcomes of improvement programmes to identify any unexplained disparities between tenant groups or locations.

The policy owner should retain evidence of monitoring, complaints, consultation and mitigations. Any material amendment should trigger a fresh screening review rather than relying solely on this assessment.

11. Consultation and publication

Use tenant feedback, complaints, staff experience and contractor learning to test the accessibility of EPC communications and works. Targeted engagement should be considered for major retrofit programmes.

12. Sign-off

Screening question	Evidence-based assessment
Policy owner / lead	Director of Asset Management and Development / Director of Property Services.
Screening completed by	Corporate Assurance Manager
Screening date	28/07/2025
Approval / quality assurance	Board / 20/08/2025
Next review	Alongside the policy review, or sooner where evidence, complaints, consultation or law indicates a changed impact.

Overall conclusion: The policy can proceed without a full EQIA, provided the identified safeguards are implemented and equality impacts continue to be monitored.