



Equality Screening

ICT P023 Data Governance Policy

August 2026

Clanmil Housing Association has a statutory duty to screen. This includes our strategies, plans, policies, legislative developments; and new ways of working such as – the introduction, change or end of an existing service, grant funding arrangement or facility. This screening template is designed to help you consider the likely equality impacts of their proposed decisions on different groups of customers, service users, staff and visitors.

The screening template has 4 sections to complete. These are:

Section A - asks you to provide details about the policy / decision that is being screened.

Section B - has 4 key questions that require you to outline the likely impacts on equality groups, and all supporting evidence.

Section C - has 4 key questions in relation to obligations under the Disability Discrimination Order

Section D - is the formal record of the screening decision.

Section A

Details about the policy / decision to be screened

Title of policy / decision to be screened:-

ICT P023 Data Governance Policy

Brief description of policy / decision to be screened:-

This policy sets out how Clanmil will manage data effectively, responsibly, and consistently across the organisation.

It covers both personal data relating to customers, applicants and staff, and non-personal corporate data used to manage business operations.

Aims and objectives of the policy / decision to be screened:-

- Aims to recognise data as a corporate asset that must be properly governed throughout its lifecycle;
- Apply consistent data quality standards across Clanmil;
- Make clear who across the organisation has accountability and responsibility for ensuring data quality is accurate, complete, timely, consistent, and fit for purpose.

On whom will the policy / decision impact?

Consider the internal and external impacts (both actual or potential)



Staff / other public sector orgs (specify)



voluntary / community groups / trade unions



others, please specify – Clanmil customers, stakeholders and any members of the public who may be affected by the services we provide

Are there linkages to other Agencies/ Departments?

- Department for Communities Northern Ireland
- Information Commissioners Office (ICO)
- NI Housing Executive (NIHE)
- PSNI
- Housing Associations Charitable Trust (HACT)

Section B

1. Outline consultation process achieved or planned

This data governance policy has been created with reference to other data governance policies across the social housing sector. It has been reviewed and approved by Clanmil's Executive Team, taking into account their feedback on existing data governance processes.

2. Available evidence

What evidence / information (both qualitative and quantitative) have you gathered to inform this policy? Set out all evidence below to help inform your screening assessment. Please note: It is important to record information gathered from a variety of sources such as:

- Monitoring information
- Complaints
- Research /surveys
- Consultation exercise and other public authorities

Section 75 category	Details of evidence / information and engagement
All the categories	This policy has been created after reviewing a range of existing data policies from other social housing sector organisations, taking best practice from these policies and from the Housing Associations Charitable Trust (HACT), who specialize in data governance.

3. What is the likely impact (indicate if the policy impact is positive or negative) on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? What is the level of impact?

Section 75 category	Likely impact?	Level of impact? Minor/Major/None
All the categories	The purpose of this policy is to enhance how Clanmil uses data across the organisation, to know its customers better and therefore be more informed when making decisions that impact customers. This is a key goal in our new 2026-31 Corporate Plan and supporting Digital Strategy. A key policy principle is that Data is collected and used for lawful, legitimate business purposes only; and that personal data is processed fairly and transparently in line with data protection legislation.	None

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?

Section 75 category	If Yes, provide details	If No, provide reasons
All the categories	This policy seeks to enhance how data is used across the organisation to deliver higher-quality, customer-focused services, and deliver organisation efficiency. We intend as an outcome of this for customers to receive increased equality of opportunity.	

3. To what extent is the policy likely to impact (positive or negatively) on good relations between people of different religious belief, political opinion or racial group? What is the level of impact?

Good relations category	Likely impact?	Level of impact? Minor/Major/None
Religious belief	This policy should have no impact on good relations between people of different religious beliefs, political opinions or racial groups. The aims of the strategy applies equally to all.	None
Political opinion	As above	None
Racial group	As above	None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good relations category	If Yes, provide details	If No, provide reasons
Religious belief		This policy is applicable irrespective of religious beliefs, political opinion or racial group.
Political opinion		As above
Racial group		As above

Section C

Clanmil Housing Association also has legislative obligations to meet under the [Disability Discrimination Order](#) and Questions 5 -6 relate to these two areas.

Consideration of Disability Duties

5. Does this proposed policy / decision provide an opportunity for the Association to better **promote positive attitudes** towards disabled people?

Explain your assessment in full

This policy is likely to have limited impact on promoting positive attitudes towards people with disabilities.

6. Does this proposed policy / decision provide an opportunity to actively **increase the participation** by disabled people in public life?

Explain your assessment in full

This policy seeks to enhance how data is used across the organisation to deliver higher-quality, customer-focused services, and deliver organisation efficiency.

This policy is unlikely to actively increase the participation by disabled people in public life, but it may support engagement/participation with Clanmil activities by disabled people through staff better knowing their customers' needs/requirements.

Monitoring Arrangements

Section 75 places a requirement for Clanmil Housing Association to have equality monitoring arrangements in place in order to assess the impact of policies and services etc; and to help identify barriers to fair participation and to better promote equality of opportunity.

Outline what data you will collect in the future in order to monitor the impact of this policy / decision on equality, good relations and disability duties.

Equality	Good Relations	Disability Duties
No data to be directly collected as a result of introducing this policy.	No data to be collected as a result of this strategy.	No data to be collected as a result of this strategy.

Section D

Formal Record of Screening Decision

Title of Proposed Policy / Decision being screened

Data Governance

I can confirm that the proposed policy / decision has been screened for –

X	equality of opportunity and good relations
X	disabilities duties

On the basis of the answers to the screening questions, I recommend that this policy / decision is –

*place an X in the appropriate box below

☐	*<u>Screened In</u> – Necessary to conduct a full EQIA
X	*<u>Screened Out</u> – No EQIA necessary (no impacts) Provide a brief note here to explain how this decision was reached: This policy sets out our key principles to data governance arrangements within Clanmil, to ensure data is managed effectively, responsibly, and consistently across the organisation. Implementation of these principles will support decision making and legal/regulatory compliance. Implementation of this policy is not expected to impact people with protected characteristics.
☐	* <u>Screened Out</u> - Mitigating Actions (minor impacts) • Provide a brief note here to explain how this decision was reached: • Explain what mitigating actions and / or policy changes will now be introduced:

Formal Record of Screening Decision (cont)

Screening assessment completed by (Manager level) -

Name: Peter Grimley
Department: ICT

Date: 24/08/26

Signature: 

Screening decision approved by (Director level) -

Name:

STUART GREEN

Date: 24/08/2026

Signature: 

The screening form will be placed on the website and a link provided to the Association's Section 75 consultees.

For more information about equality screening contact Bernadette O'Donnell, Senior HR Business Partner at bernadette.odonnell@clanmil.org.uk