



Equality Screening Template

Statutory Compliance Policy

9th September 2025

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 to be screened

Title of policy to be screened: -

Statutory Compliance

Brief description of policy to be screened: -

This policy covers the approach to be taken by Clanmil to meet its statutory and legal obligations for compliance checks in all properties within the Group.

We will service, maintain, and inspect key property equipment & systems to ensure the provision of a safe environment for our customers and protect our asset base.

The policy sets out Clanmil's aim to monitor and manage statutory compliance for all properties within the group and all compliance managed on behalf of a third party within a service level agreement.

Compliance testing will be carried out:

- To prevent the occurrence or compact of fire
- To ensure heating systems are safe and efficient
- To Maintain mechanical and electrical systems
- To Manage and test against identifiable risks areas in properties
- To Prevent break down of equipment
- To Improve customer experience
- As an insurance record of condition

Aims and objectives of the policy to be screened: -

Due to various legislation and guidance currently in place, as a registered landlord, Clanmil has over 40 separate compliance areas which set out the servicing and inspection requirements.

We will identify through our departmental and strategic risk registers the priority risk areas and that risks are minimised by regular checks and tests. We recognise the Big 5 compliance risks of:

- Gas
- Electrical
- Water Quality
- Fire Safety
- Asbestos Management

A 6th priority risk area for Damp and Mould (AS008A), for these compliance areas sets out our methodology in managing these with specific procedures.

The remaining areas of compliance areas management process is detailed within AS001D for Procedure for Miscellaneous Servicing Procedure.

It is our aim to ensure compliance checks determine the extent of any actual or potential risks and to set tasks/actions to remediate, within a reasonable and timely manner, based on the risks posed. The following 6 key areas are regarded as the priority risk areas.

Priority risks will be managed using specific operational procedures such as:

1. Gas (Boilers and appliances) (AS001A)
2. Fire Safety (AS001B)
3. Electrical (AS001G)
4. Water Management (Legionella Monitoring and Risk Assessments) (AS001C)
5. Asbestos (AS001F)
6. Damp, Mould and Condensation (AS008A)

All systems/equipment will be serviced in accordance with the relevant legislation,

On whom will the policy impact?

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

Yes Staff / other public sector orgs (specify)

N/A Voluntary / community groups / trade unions

Yes Others, please specify – Clanmil customers (tenants and residents)

Are there links to other Agencies/ Departments? Yes

The Assets Department is the department primarily responsible for the implementation of the Statutory Compliance Policy, however, housing colleagues will, from time to time, also provide assistance to their colleagues in Assets in its implementation e.g. Assets and Housing colleagues working together to guarantee access to properties where critical servicing is required such as domestic boilers.

Key external groups include the Dept for Communities (DfC) and annual performance of its statutory compliance duties is reported to it.

Contractors and Specialist Consultants are also key partners and they will carry out the servicing/inspection duties this policy specifies.

Section B

1. Outline consultation process achieved or planned

Consultation was carried out with internal Housing colleagues.

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
Religious belief	
Political opinion	
Racial group	
Age	
Marital status	
Sexual orientation	
Men & women generally	See below
Disability	See below
Dependants	See below

As stated earlier, the Statutory Compliance Policy has been written to ensure that Clanmil meets its statutory duties regarding the servicing, inspection and maintenance of systems within its properties.

Complaints

Clanmil has a formal complaints process in place where all formal complaints are registered. During the year ending 31st March 25 Assets received a total of 34 complaints (68%) which were handled at Stage 1.

There were 8 complaints dealt with at Stage 2.

During the year there were 157 Make it Right complaints of which 100 were handled by Assets

Key Performance Indicators (KPIs)

The most important evidence provided in relation to its statutory compliance duties is Key Performance Indicators and they are produced at regular intervals throughout the year for various stakeholders including: -

External

- Department for Communities (DfC) Annual Regulatory Return (ARR)

Internal

- Board of Management
- Group Audit and Risk Committee
- Executive Team Board
- Health, Safety and Wellbeing Committee

Annual and Monthly satisfaction surveys are carried out by an external 3rd party IFF and for the year ending 31st March 25 the annual results for satisfaction surveys was 79%.

For monthly surveys the annual satisfaction of those sampled was 85.1% based on 1667 respondents.

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
Religious belief		None
Political opinion		None
Racial group		None
Age		None
Marital status		None
Sexual orientation		None
Men and women generally	Positive	Major
Disability	Positive	Major
Dependants	Positive	Minor

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
Religious belief	N/A	No – see below
Political opinion	N/A	No – see below
Racial group	N/A	No – see below
Age	N/A	No – see below
Marital status	N/A	No – see below
Sexual orientation	N/A	No – see below
Men and women generally	N/A	No – see below
Disability	N/A	No – see below
Dependants	N/A	No – see below

Customers belonging to any of the nine categories will not influence the way in which servicing is carried out.

The Policy will have a positive impact on all customers as it provides assurance to customers that effective systems are in place to ensure statutory duties are carried out.

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	N/A	None
Political opinion	N/A	None
Racial group	N/A	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		No
Political opinion		No
Racial group		No

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 provide an opportunity for the Association to better **promote positive attitudes** towards disabled people?

The policy sets out the approach we will take regarding the statutory checks are carried out. For anyone with a disability Assets and Housing colleagues will be mindful of any specific requirements of someone with a disability e.g. ensuring that colleagues adhere to correct contact arrangements with customers to ensure servicing is carried out in accordance with timescales and, where necessary, liaise with designated points of contact.

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

No, however, the completion of statutory checks included in this policy will provide peace of mind to all Clanmil customers that checks are completed in line with timescales.

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
See below	.	See below

The Assets department reports regularly to various stakeholders on its performance through Key Performance Indicators (KPIs), both internal and external – these include DfC/ET Board, Board GARC and HSW Forum, on the performance of statutory checks this policy specifies. Where performance is less than target, KPI reporting will specify what action is being taken to improve performance.

Section D

Formal Record of Screening Decision

Title of Proposed Policy being screened: -

Statutory Compliance

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

Yes	equality of opportunity and good relations
Yes	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
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☒	*<u>Screened Out</u> – No EQIA necessary (no impacts) Provide a brief note here to explain how this decision was reached: The policy sets out legislative requirements placed on Clanmil for carrying out statutory checks and applies to every property irrespective of which group the customer belongs to.
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☐	* <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:
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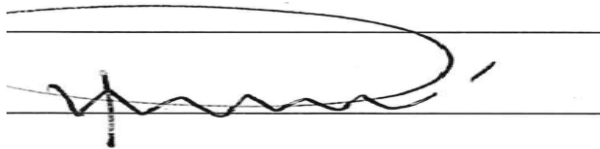
Formal Record of Screening Decision (cont)

Screening assessment completed by (Manager level) -

Name: J Pow

Date: 9th September 2025

Department : Assets

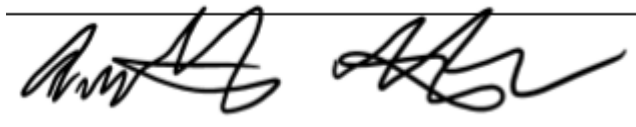
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Screening decision approved by (Director level) -

Name:

T Giffen, EDA&BS

Date: 9th September 2025

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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, HR Business Partner at bernadette.odonnell@clanmil.org.uk