

Section 75 Screening Form

Part 1. Policy scoping

The first stage of the screening process involves scoping the policy under consideration. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy, being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

Public authorities should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Information about the policy

Name of the policy

EVERY HOUSE MATTERS: A NEW APPROACH TO TACKLING SOCIAL HOUSING TENANCY FRAUD

Background

The Department for Communities is undertaking a review of social housing tenancy fraud to ensure that social housing stock is protected and allocated fairly to those in genuine need. Current legislation is not considered robust enough to address the range and scale of tenancy fraud activities, such as unlawful subletting, false applications, and non-occupation.

A public consultation, Every House Matters: A New Approach to Tackling Social Housing Tenancy Fraud, has been developed to seek views on how we can progress the review of tenancy fraud and particularly how we can improve and strengthen the legislative framework. Consultation findings will inform proposals for inclusion in future legislation. The consultation sets out 3 key objectives: to raise awareness about what tenancy fraud is and why it is important to address;

to strengthen legislative powers and to put measures in place to support and protect those affected.

Is this an existing, revised or a new policy?

New policy

What is it trying to achieve? (intended aims/outcomes)

The policy aims to strengthen the legislative framework in Northern Ireland to better prevent, deter and address social-housing tenancy fraud. Its primary purpose is to ensure that social homes are used appropriately and allocated fairly to those in genuine need.

Key intended outcomes include:

- Reducing tenancy fraud (e.g. unlawful subletting, false applications, key selling, non-occupation).
- Improving availability of social homes by recovering properties which had been misused or unlawfully acquired by a person who is not entitled to occupy it, or who has obtained it through false representation or failure to disclose a relevant change of circumstances.
- Enhancing fairness and integrity of the Housing Selection Scheme.
- Increasing deterrence through clearer offences and proportionate penalties.
- Improving investigation capability, including data-sharing powers where appropriate.
- Supporting a more consistent approach across the Housing Executive and Registered Housing Associations.
- Reducing reliance on temporary accommodation, easing pressure on households and public finances.
- Raising awareness of tenancy fraud risks and reporting routes.

Through these measures, the policy seeks to protect scarce public housing assets, improve transparency and efficiency in the system, and ensure that social housing is prioritised for those who need it most.

Are there any Section 75 categories which might be expected to benefit from the intended policy?

Yes, all Section 75 categories should benefit from the intended policy, rather than any particular Section 75 category/categories.

If Yes, explain how.

By recovering more social houses through increased investigation of tenancy fraud, additional housing can be made available to individuals in genuine need — including those experiencing housing stress. This benefit should apply equally to people in all Section 75 categories.

Who initiated or wrote the policy?

The Department for Communities initiated and wrote the policy.

Who owns and who implements the policy?

The Department for Communities owns the policy. NIHE and the RHAs will implement the policy.

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

If yes, are they

- financial
- legislative
- other, please specify _____

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

- staff (They will follow new/revised process)

service users (Social housing tenants which include both Housing Executive and RHA tenants).

other public sector organisations (Housing Executive, Supporting People, Department of Justice, Department of Health)

voluntary/community/trade unions (Housing Rights, Northern Ireland Federation of Housing Association and Advice NI)

other, please specify _____

Other policies with a bearing on this policy

What are they and who owns them?

| Potential policies in relation to offences and penalties owned by the Department of Justice.

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for **each** of the Section 75 categories.

Section 75 category	Details of evidence/information
All	<p>The Department has undertaken initial Equality Screening to assess whether proposals to strengthen legislation to tackle social housing tenancy fraud may differentially impact any of the Section 75 equality categories. The screening has drawn on a range of evidence, including:</p> <ul style="list-style-type: none">• Existing demographic data on social-housing applicants and tenants;• Information from the Housing Executive and Registered Housing Associations regarding tenancy fraud investigations and tenancy allocations;• Stakeholder engagement from review workshops and working groups;• Lessons learned from similar legislation implemented in England and Wales (The Prevention of Social Housing Fraud Act 2013 (PoSHFA)).• Relevant external scrutiny, including NI Audit Office and Public Accounts Committee findings;• Early responses from sectoral partners on potential impacts.

Section 75 category	Details of evidence/information
	<p>The purpose of the proposed policy so far, is to ensure that social homes are used by those who are legally entitled to them, thereby improving fairness and access to housing for individuals and families in genuine need.</p>
Religious belief	<p>To inform development of the proposed tenancy fraud legislative provisions, the Department has drawn on a range of qualitative and quantitative evidence relating to religion and housing in Northern Ireland. This includes:</p> <ul style="list-style-type: none"> • Population and housing-need data from the Housing Executive and broader demographic datasets, indicating the level of housing demand across communities. • Common Waiting List and Housing Allocation System data, which demonstrate that social housing is accessed across all religious backgrounds under an established, needs-based scheme. • NI Audit Office and Public Accounts Committee reports, which highlight limitations in current responses to tenancy fraud and the benefits of improved investigation capacity. • The Wallace Report (2015) – ‘Social Housing & Good Relations’, which found that although housing can reflect wider societal patterns of segregation, social housing allocation operates on a transparent, needs-based system that applies equally regardless of religious background. The report supports the principle that policy influencing the use and protection of social housing should be

Section 75 category	Details of evidence/information
	<p>applied consistently to maintain fairness and confidence across all communities.</p> <ul style="list-style-type: none"> • Engagement with stakeholders, including the Housing Executive, Registered Housing Associations and sector representatives, which has not identified concerns of differential impact by religious belief. • Feedback from the Tenancy Fraud Working Group and review workshops, which focus on operational challenges and best practice rather than religious-based differentials. • Comparative analysis of similar legislative reforms in England and Wales (PoSHFA), which showed no evidence of disproportionate impacts on any religious group. • Equality Screening and impact assessment processes, undertaken alongside policy development, which have not identified any differential adverse impact linked to religious background. <p>Overall, the available evidence indicates that strengthening legislation to prevent and deter tenancy fraud is expected to operate neutrally across religious groups, as the proposals do not alter eligibility or allocation criteria and are intended to improve fairness and access for all those in housing need.</p>
Political opinion	<p>To inform development of the proposed measures, the Department has considered a range of qualitative and quantitative evidence relevant to potential impacts across political opinion. This includes:</p> <ul style="list-style-type: none"> • Housing Executive data on waiting lists, allocations and housing stress, demonstrating that social housing is allocated on the basis of assessed need rather than political identity.

Section 75 category	Details of evidence/information
	<ul style="list-style-type: none"> • Operational evidence from the Housing Executive and Registered Housing Associations on the scale and nature of tenancy fraud investigations, which does not indicate any differential trends linked to political opinion. • Findings from NI Audit Office and Public Accounts Committee reports, which identify opportunities to improve tenancy fraud management; neither identifies differential impact by political affiliation. • Engagement feedback from sector stakeholders, including housing providers and representative bodies, which has not raised concerns about political-identity-based differential impacts. • Review of existing housing legislation and processes, including the Housing Selection Scheme, which governs allocations on a neutral, needs-based basis. • Comparative analysis of legislation implemented in England and Wales (PoSHFA), which shows no evidence of disproportionate impacts based on political opinion. • Equality Screening and associated impact-assessment work, which has not identified actual or potential adverse impacts on individuals based on political opinion. <p>In Northern Ireland Statistics and Research Agency's Census 2021:</p> <ul style="list-style-type: none"> • 814,600 people (42.8%) in Northern Ireland identified as British (solely or along with other identities).

Section 75 category	Details of evidence/information
	<ul style="list-style-type: none"> • 634,600 people (33.3%) identified as Irish (solely or along with other identities). • 598,800 people (31.5%) identified as Northern Irish (solely or along with other identities). • Respondents could select more than one identity; hence these figures are not mutually exclusive. <p>While national identity is not a direct measure of political opinion, the data provides a useful contextual baseline. No evidence has been identified to suggest that individuals grouped by political opinion will be differently or adversely impacted by the proposed tenancy fraud legislation. The proposals do not change eligibility or allocation criteria and are designed to support fair access to social housing by reducing misuse of existing housing stock. The legislation will apply uniformly across all areas and groups. Overall, the evidence indicates the proposals are neutral in respect of political opinion. The forthcoming public consultation will allow further investigation of any unforeseen impacts across the political-opinion spectrum. No differential or adverse impacts relating to political opinion have been identified at this stage</p>
Racial group	<p>To inform development of the proposed tenancy fraud legislative provisions, the Department has considered a range of quantitative and qualitative evidence relevant to racial groups, including:</p> <ul style="list-style-type: none"> • Northern Ireland Census 2021 data, which shows that the population remains predominantly White (95.6%), with minority ethnic groups representing approximately 3.3% of the population. The largest minority communities include Asian, Mixed, Black, and Other ethnic backgrounds. This provides an

Section 75 category	Details of evidence/information
	<p>understanding of the demographic context within which social housing policies operate.</p> <ul style="list-style-type: none"> • Housing Executive data on housing applications, waiting lists and allocations, which demonstrates that social housing is allocated in line with the Housing Selection Scheme, based on assessed need rather than racial or ethnic identity. • Operational evidence from the Housing Executive and Registered Housing Associations on the scale and nature of tenancy fraud investigations. No evidence indicates that individuals from specific racial groups are disproportionately represented among tenancy fraud cases. • Engagement with key stakeholders, including social housing providers and sector partners, which has not identified concerns regarding disproportionate impacts on racial or ethnic groups. • Findings from NI Audit Office and Public Accounts Committee reports, neither of which highlight racial disproportionality in tenancy fraud activity or outcomes. • Lessons learned from legislative reforms in England and Wales (PoSHFA), where implementation did not demonstrate differential impacts based on racial background. <p>Therefore, strengthening tenancy fraud legislation—by increasing the availability of social homes for those in genuine need—may provide an indirect positive impact for minority ethnic groups.</p>

Section 75 category	Details of evidence/information										
	<p data-bbox="418 380 1000 415">Census 2021 - S75 Tenure tables</p> <p data-bbox="418 453 1081 489">Social Rented (HA or charitable trust)</p> <p data-bbox="418 527 1232 606">Household: <u>Tenure by Racial Group</u> shows the following breakdown:</p> <table border="1" data-bbox="418 642 1357 1182"> <tbody> <tr> <td data-bbox="423 646 889 749">White</td> <td data-bbox="889 646 1354 749">95.6%</td> </tr> <tr> <td data-bbox="423 749 889 856">Asian</td> <td data-bbox="889 749 1354 856">1.1%</td> </tr> <tr> <td data-bbox="423 856 889 963">Black</td> <td data-bbox="889 856 1354 963">1.3%</td> </tr> <tr> <td data-bbox="423 963 889 1071">Mixed</td> <td data-bbox="889 963 1354 1071">1.1%</td> </tr> <tr> <td data-bbox="423 1071 889 1178">Other</td> <td data-bbox="889 1071 1354 1178">0.9%</td> </tr> </tbody> </table>	White	95.6%	Asian	1.1%	Black	1.3%	Mixed	1.1%	Other	0.9%
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Age	<p data-bbox="418 1304 1328 1472">To inform the development of proposals to strengthen legislation relating to social housing tenancy fraud, the Department has considered a range of quantitative and qualitative evidence relating to age, including:</p> <ul data-bbox="467 1507 1357 1915" style="list-style-type: none"> <li data-bbox="467 1507 1357 1759">• Northern Ireland Census 2021 age-profile data, which shows that the population is ageing, with 17.2% aged 65 and over and approximately 20.7% aged under 16. This provides demographic context for the range of age groups who may be affected by social-housing policy. <li data-bbox="467 1795 1357 1915">• Housing Executive data on waiting lists and allocations, which demonstrates that households across all age brackets access social housing, with 										

Section 75 category	Details of evidence/information
	<p>no evidence that tenancy fraud activity disproportionately affects any specific age group.</p> <ul style="list-style-type: none"> • Operational evidence from the Housing Executive and Registered Housing Associations, including information on tenancy fraud investigations and outcomes, which shows no age-related trends in either perpetrators or those affected. • Findings from the Wallace Report (2015) – ‘Social Housing & Good Relations’, which concluded that social housing allocation operates on a transparent, needs-based system applied consistently across age groups, and did not identify systemic age-based differentials in access to social housing. • NI Audit Office and Public Accounts Committee reports, which highlight opportunities for improvement in tenancy fraud management but do not identify concerns relating to age. • Stakeholder engagement, including consultation with housing providers, working groups and sector partners, which has not highlighted age-specific concerns. • Comparative lessons from implementation of the Prevention of Social Housing Fraud Act (2013) in England and Wales, where no significant differential impact by age was identified. • Equality Screening and other impact-assessment activity, which has not identified any adverse differential impact relating to age.

Section 75 category	Details of evidence/information						
Marital status	<p>Census 2021 data shows a diverse population across marital-status categories (single, married, civil-partnered, separated, divorced and widowed). Housing Executive data indicates that social-housing allocation is based on assessed need rather than marital status, and applicants across all categories access social housing. Operational evidence from the Housing Executive and Registered Housing Associations shows no marital-status-related trends in tenancy fraud activity. Engagement with providers, NIAO and PAC reports, and lessons from England/Wales reforms (PoSHFA)</p> <p>Census 2021 - S75 Tenure tables</p> <p>Social Rented (HA or charitable trust) Household: Tenure by Marital and Civil Partnership Status shows the following breakdown:</p> <table border="1" data-bbox="418 1066 1357 1436"> <tbody> <tr> <td data-bbox="418 1066 1110 1220">Single (never married or never registered in a civil partnership)</td> <td data-bbox="1110 1066 1357 1220">53.2%</td> </tr> <tr> <td data-bbox="418 1220 1110 1329">Married or in a civil partnership</td> <td data-bbox="1110 1220 1357 1329">18%</td> </tr> <tr> <td data-bbox="418 1329 1110 1436">Other marital or civil partnership status</td> <td data-bbox="1110 1329 1357 1436">28%</td> </tr> </tbody> </table>	Single (never married or never registered in a civil partnership)	53.2%	Married or in a civil partnership	18%	Other marital or civil partnership status	28%
Single (never married or never registered in a civil partnership)	53.2%						
Married or in a civil partnership	18%						
Other marital or civil partnership status	28%						
Sexual orientation	<p>Census 2021 indicates that the majority of the NI population identifies as heterosexual, with small but increasing representation of lesbian, gay, bisexual and other identities. Housing Executive data confirms that social -housing access is based on assessed need, not sexual orientation, and applicants across all groups are housed through the Common Waiting List. Operational evidence from the Housing Executive and Registered Housing Associations shows no indication that tenancy fraud activity or outcomes vary by sexual orientation. Stakeholder engagement, NIAO/PAC reports and</p>						

Section 75 category	Details of evidence/information						
	<p>lessons from England/Wales (PoSHFA) have not identified differential impacts.</p> <p>Census 2021 - S75 Tenure tables – Social Rented (HA or charitable trust)</p> <p>Household: <u>Tenure by Sexual Orientation</u> shows the following breakdown:</p> <table border="1" data-bbox="418 653 1352 1018"> <tbody> <tr> <td data-bbox="418 653 1110 762">Straight or heterosexual</td> <td data-bbox="1110 653 1352 762">86.2%</td> </tr> <tr> <td data-bbox="418 762 1110 913">Gay, Lesbian, bisexual, other sexual orientation</td> <td data-bbox="1110 762 1352 913">2.9%</td> </tr> <tr> <td data-bbox="418 913 1110 1018">Prefer not to say/not stated</td> <td data-bbox="1110 913 1352 1018">11%</td> </tr> </tbody> </table>	Straight or heterosexual	86.2%	Gay, Lesbian, bisexual, other sexual orientation	2.9%	Prefer not to say/not stated	11%
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<p>Men and women generally</p>	<p>Census 2021 shows a broadly even gender split in Northern Ireland (approx. 51% female / 49% male). Housing Executive data confirms that social-housing allocation is based on assessed need rather than gender, with both men and women accessing housing across all tenures. Operational evidence from the Housing Executive and Registered Housing Associations does not indicate gender-based trends in tenancy fraud activity.</p> <p>The Wallace Report (2015) found that social-housing allocation operates on a transparent, needs-based system and did not identify systemic gender-based access issues. Engagement with stakeholders, NIAO/PAC reports and lessons from England/Wales (PoSHFA) have not highlighted concerns of differential gender impact. The report found that women are over-represented among households in housing stress.</p>						

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	<p data-bbox="418 331 1286 415"><u>Census 2021 - S75 Tenure tables – Social Rented (HA or charitable trust)</u></p> <p data-bbox="418 449 1221 533">Household: <u>Tenure by Sex</u> shows the following breakdown:</p> <table border="1" data-bbox="418 567 1354 781"> <tr> <td data-bbox="425 575 889 676">Male</td> <td data-bbox="889 575 1354 676">45.5%</td> </tr> <tr> <td data-bbox="425 676 889 777">Female</td> <td data-bbox="889 676 1354 777">54.5%</td> </tr> </table> <p data-bbox="418 890 1295 974">The NI Housing Bulletin Apr – Jun 25 indicates as follows:</p> <p data-bbox="418 1008 1321 1092">Social Housing Waiting List and Housing Stress by Sex (NIHE, March 2025)</p> <p data-bbox="418 1129 1263 1213"><u>Table 1: Waiting List Breakdown – Age & Sex of Main Applicant</u></p> <table border="1" data-bbox="418 1213 1354 1621"> <thead> <tr> <th data-bbox="425 1222 646 1255">Age Group</th> <th data-bbox="652 1222 880 1285">Female Applicants</th> <th data-bbox="886 1222 1114 1285">Male Applicants</th> <th data-bbox="1120 1222 1347 1285">Total Applicant Households</th> </tr> </thead> <tbody> <tr> <td data-bbox="425 1293 646 1356">Under 18 / 18-25</td> <td data-bbox="652 1293 880 1327">3,783</td> <td data-bbox="886 1293 1114 1327">2,330</td> <td data-bbox="1120 1293 1347 1327">6,101</td> </tr> <tr> <td data-bbox="425 1365 646 1398">26-29</td> <td data-bbox="652 1365 880 1398">2,780</td> <td data-bbox="886 1365 1114 1398">1,906</td> <td data-bbox="1120 1365 1347 1398">4,686</td> </tr> <tr> <td data-bbox="425 1407 646 1440">30-39</td> <td data-bbox="652 1407 880 1440">6,971</td> <td data-bbox="886 1407 1114 1440">5,542</td> <td data-bbox="1120 1407 1347 1440">12,513</td> </tr> <tr> <td data-bbox="425 1449 646 1482">40-49</td> <td data-bbox="652 1449 880 1482">4,938</td> <td data-bbox="886 1449 1114 1482">4,383</td> <td data-bbox="1120 1449 1347 1482">9,321</td> </tr> <tr> <td data-bbox="425 1491 646 1524">50-59</td> <td data-bbox="652 1491 880 1524">3,423</td> <td data-bbox="886 1491 1114 1524">3,490</td> <td data-bbox="1120 1491 1347 1524">6,913</td> </tr> <tr> <td data-bbox="425 1533 646 1566">60-64</td> <td data-bbox="652 1533 880 1566">1,389</td> <td data-bbox="886 1533 1114 1566">1,404</td> <td data-bbox="1120 1533 1347 1566">2,793</td> </tr> <tr> <td data-bbox="425 1575 646 1608">65+</td> <td data-bbox="652 1575 880 1608">3,781</td> <td data-bbox="886 1575 1114 1608">2,963</td> <td data-bbox="1120 1575 1347 1608">6,744</td> </tr> <tr> <td data-bbox="425 1617 646 1650">Total</td> <td data-bbox="652 1617 880 1650">27,065</td> <td data-bbox="886 1617 1114 1650">22,018</td> <td data-bbox="1120 1617 1347 1650">49,083</td> </tr> </tbody> </table> <p data-bbox="418 1654 1273 1696"><u>Table 2: Waiting List and Housing Stress by Sex</u></p> <table border="1" data-bbox="418 1696 1354 1911"> <thead> <tr> <th data-bbox="425 1705 678 1768">Category</th> <th data-bbox="685 1705 912 1768">Male Applicants</th> <th data-bbox="919 1705 1146 1768">Female Applicants</th> <th data-bbox="1153 1705 1347 1768">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="425 1776 678 1839">Social housing waiting list</td> <td data-bbox="685 1776 912 1810">22,018 (45%)</td> <td data-bbox="919 1776 1146 1810">27,065 (55%)</td> <td data-bbox="1153 1776 1347 1810">49,083</td> </tr> <tr> <td data-bbox="425 1848 678 1911">Applicants in housing stress</td> <td data-bbox="685 1848 912 1881">16,149 (43%)</td> <td data-bbox="919 1848 1146 1881">21,486 (57%)</td> <td data-bbox="1153 1848 1347 1881">37,635</td> </tr> </tbody> </table>	Male	45.5%	Female	54.5%	Age Group	Female Applicants	Male Applicants	Total Applicant Households	Under 18 / 18-25	3,783	2,330	6,101	26-29	2,780	1,906	4,686	30-39	6,971	5,542	12,513	40-49	4,938	4,383	9,321	50-59	3,423	3,490	6,913	60-64	1,389	1,404	2,793	65+	3,781	2,963	6,744	Total	27,065	22,018	49,083	Category	Male Applicants	Female Applicants	Total	Social housing waiting list	22,018 (45%)	27,065 (55%)	49,083	Applicants in housing stress	16,149 (43%)	21,486 (57%)	37,635
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Section 75 category	Details of evidence/information
	Homeless presentations 35.4% single males 27.9% families (mainly female-headed) —
Disability	<p>Census 2021 indicates that approximately 24% of the population in Northern Ireland reports a disability or long-term health condition, demonstrating that a significant proportion of households potentially interacting with social-housing services may include disabled persons.</p> <p>The Northern Ireland House Condition Survey (2009) identified that disabled households are more likely to live in unsuitable or poor-quality housing, and often require adaptations or specialist provision. More recent Housing Executive data confirms that disabled applicants are disproportionately represented on the social-housing waiting list and among those in housing stress. Strengthening tenancy fraud legislation, which aims to protect social-housing availability for those in genuine need.</p> <p>Operational information from the Housing Executive and Registered Housing Associations does not indicate disability-related over-representation in tenancy fraud investigations or outcomes. Engagement with sector stakeholders and assessment of external evidence (including NIAO/PAC reports and comparison with reforms in England/Wales under PoSHFA) has not identified concerns around differential impact based on disability.</p> <p>However, continued monitoring will take place as consultation responses are analysed.</p> <p>The Statement on Key Inequalities in Housing and Communities in Northern Ireland states that considerations in this area are hindered by the fact that</p>

Section 75 category	Details of evidence/information								
	<p>many definitions of disability exist and not all surveys utilise the same definition in their data collection process.</p> <p>The Northern Ireland House Condition Survey 2009 showed that households that include someone with a disability or life limiting illness, are more likely to live in social housing, than households without someone with a disability</p> <p>Census 2021 - S75 Tenure tables – Social Rented (HA or charitable trust)</p> <p>Household: <u>Tenure by Health Condition (Mobility – Limits Physical Activity)</u> shows the following breakdown:</p> <table border="1" data-bbox="418 982 1356 1327"> <tbody> <tr> <td data-bbox="418 982 1110 1136">Has a mobility or dexterity difficulty that limits basic physical activities</td> <td data-bbox="1110 982 1356 1136">21.2%</td> </tr> <tr> <td data-bbox="418 1136 1110 1327">Does not have a mobility or dexterity difficulty that limits basic physical activities</td> <td data-bbox="1110 1136 1356 1327">78.8%</td> </tr> </tbody> </table> <p>Census 2021 - S75 tables – Social Rented (HA or charitable trust)</p> <p>Household: <u>Tenure by Health Condition (Mobility – Requires Wheelchair)</u> shows the following breakdown:</p> <table border="1" data-bbox="418 1591 1356 1934"> <tbody> <tr> <td data-bbox="418 1591 1110 1745">Has a mobility or dexterity difficulty that requires the use of a wheelchair</td> <td data-bbox="1110 1591 1356 1745">3.3%</td> </tr> <tr> <td data-bbox="418 1745 1110 1934">Does not have a mobility or dexterity difficulty that requires the use of a wheelchair</td> <td data-bbox="1110 1745 1356 1934">96.7%</td> </tr> </tbody> </table>	Has a mobility or dexterity difficulty that limits basic physical activities	21.2%	Does not have a mobility or dexterity difficulty that limits basic physical activities	78.8%	Has a mobility or dexterity difficulty that requires the use of a wheelchair	3.3%	Does not have a mobility or dexterity difficulty that requires the use of a wheelchair	96.7%
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Section 75 category	Details of evidence/information																					
	<p>Census 2021 - S75 tables – Social Rented (HA or charitable trust)</p> <p>Household: <u>Tenure by Learning Disability</u> shows the following breakdown:</p> <table border="1" data-bbox="435 569 1357 827"> <tr> <td data-bbox="435 569 1110 674">Has an intellectual or learning disability</td> <td data-bbox="1110 569 1357 674">2.7%</td> </tr> <tr> <td data-bbox="435 674 1110 827">Does not have an intellectual or learning disability</td> <td data-bbox="1110 674 1357 827">97.3%</td> </tr> </table>	Has an intellectual or learning disability	2.7%	Does not have an intellectual or learning disability	97.3%																	
Has an intellectual or learning disability	2.7%																					
Does not have an intellectual or learning disability	97.3%																					
<p>Dependants</p>	<p>NIHE Waiting List Households with Dependants (March 2024)</p> <table border="1" data-bbox="435 1045 1357 1549"> <thead> <tr> <th data-bbox="435 1045 727 1079">Household Type</th> <th data-bbox="727 1045 1052 1115">Number of Households</th> <th data-bbox="1052 1045 1357 1115">Percentage of Total Waiting List</th> </tr> </thead> <tbody> <tr> <td data-bbox="435 1115 727 1184">1 Parent and 1 Child</td> <td data-bbox="727 1115 1052 1148">5,739</td> <td data-bbox="1052 1115 1357 1148">12%</td> </tr> <tr> <td data-bbox="435 1184 727 1253">1 Parent and 2 Children</td> <td data-bbox="727 1184 1052 1218">3,321</td> <td data-bbox="1052 1184 1357 1218">7%</td> </tr> <tr> <td data-bbox="435 1253 727 1287">2 Adults and 1 Child</td> <td data-bbox="727 1253 1052 1287">1,389</td> <td data-bbox="1052 1253 1357 1287">3%</td> </tr> <tr> <td data-bbox="435 1287 727 1356">2 Adults and 2 Children</td> <td data-bbox="727 1287 1052 1320">1,286</td> <td data-bbox="1052 1287 1357 1320">3%</td> </tr> <tr> <td data-bbox="435 1356 727 1425">Other Family Households with Dependants</td> <td data-bbox="727 1356 1052 1390">Approx. 1,000</td> <td data-bbox="1052 1356 1357 1390">2%</td> </tr> <tr> <td data-bbox="435 1425 727 1549">Total Waiting List (All Households)</td> <td data-bbox="727 1425 1052 1495">47,312</td> <td data-bbox="1052 1425 1357 1495">100%</td> </tr> </tbody> </table> <p data-bbox="435 1556 1357 1738">Source: Northern Ireland Housing Executive, Social Housing Waiting List Data (31 March 2024). Figures show the number of households on the waiting list by household type, including those with dependants. One-parent households with children represent approximately 19% of the total waiting list.</p> <p data-bbox="435 1822 1357 1902">The DfC Audit of Inequalities 2022 – There is little literature that examined children’s housing</p>	Household Type	Number of Households	Percentage of Total Waiting List	1 Parent and 1 Child	5,739	12%	1 Parent and 2 Children	3,321	7%	2 Adults and 1 Child	1,389	3%	2 Adults and 2 Children	1,286	3%	Other Family Households with Dependants	Approx. 1,000	2%	Total Waiting List (All Households)	47,312	100%
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Section 75 category	Details of evidence/information				
	<p>circumstances specifically. Moreover, it was clear that there were interactions with other equality grounds, such as gender, marital status and/or ethnicity, which were associated with different housing outcomes. Households with dependants are more likely to live in overcrowded social housing homes, especially lone parents and multi-adult households that may include dependent children for the potential for adverse impacts on household members.</p> <p>The Wallace Report (2015) states that the Section 75 duty also encompasses households with or without dependants due to disability or life limiting illness, who may not necessarily be children. Housing issues of carers and their dependants are absent from the literature, however, and there is limited data. There are no specific housing requirements of households with or without dependants, over and above the requirements for homes that are accessible, have adequate space for household members, affordable and safe from harm, but households with dependants may require additional stability with conditions that allow children to develop physically and emotionally.</p> <p>The Department does not hold relevant data on adult dependents.</p> <p>Census 2021 - S 75 tables – Social Rented (HA or charitable trust)</p> <p>Household: <u>Tenure by Dependent Child</u> shows the following breakdown:</p> <table border="1" data-bbox="418 1717 1356 1932"> <tbody> <tr> <td data-bbox="418 1717 889 1827">Not a dependent child</td> <td data-bbox="889 1717 1356 1827">68.6%</td> </tr> <tr> <td data-bbox="418 1827 889 1932">Dependent child</td> <td data-bbox="889 1827 1356 1932">31.4%</td> </tr> </tbody> </table>	Not a dependent child	68.6%	Dependent child	31.4%
Not a dependent child	68.6%				
Dependent child	31.4%				

Section 75 category	Details of evidence/information
	The household types with the second highest proportion of homeless presenters during January – March 2024 were families (28.7%)

Note to reader - If you are aware of and would like the Department to take into account any further evidence or information relevant to this policy, please send this to: **SocialHousingPolicy@communities-ni.gov.uk**

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision?

Specify details for **each** of the Section 75 categories

Section 75 category	Details of needs/experiences/priorities
Religious belief	There is no evidence of any different needs, experiences or priorities for this section 75 group.
Political opinion	There is no evidence of any different needs, experiences or priorities for this section 75 group.
Racial group	There is no evidence of any different needs, experiences or priorities for this section 75 group.
Age	There is no evidence of any different needs, experiences or priorities for this section 75 group.
Marital status	There is no evidence of any different needs, experiences or priorities for this section 75 group.
Sexual orientation	There is no evidence of any different needs, experiences or priorities for this section 75 group.
Men and women generally	There is no evidence of any different needs, experiences or priorities for this section 75 group.
Disability	There is no evidence of any different needs, experiences or priorities for this section 75 group.

Section 75 category	Details of needs/experiences/priorities
Dependants	<p>There are no specific housing requirements for households with or without dependants, beyond the need for homes to be accessible, safe, affordable and provide adequate space (Wallace Report, 2015)</p> <p>However, households with dependants may require greater housing stability, particularly to support children’s physical and emotional development.</p> <p>Where tenancy enforcement action occurs, individual circumstances, including section 75 considerations such as dependant children, will be taken into account, and tenants retain the right to appeal tenancy termination through the courts.</p>

Part 2. Screening questions

Introduction

In making a decision as to whether or not there is a need to carry out an equality impact assessment, the public authority should consider its answers to the questions 1-4 which are given on pages 66-68 of this Guide.

If the public authority's conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then the public authority may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, a public authority should give details of the reasons for the decision taken.

If the public authority's conclusion is **major** in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration should be given to subjecting the policy to the equality impact assessment procedure.

If the public authority's conclusion is **minor** in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to:

- measures to mitigate the adverse impact; or
- the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

In favour of a 'major' impact

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are

concerns amongst affected individuals and representative groups, for example in respect of multiple identities;

- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- a) The policy has no relevance to equality of opportunity or good relations.
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the evidence presented above, consider and comment on the likely impact on equality of opportunity and good relations for those affected by this policy, in any way, for each of the equality and good relations categories, by applying the screening questions given overleaf and indicate the level of impact on the group i.e. minor, major or none.

Screening questions

1. What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? minor/major/none

Section 75 category	Details of policy impact	Level of impact? minor/major/none
Religious belief	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	Minor
Political opinion	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	Minor
Racial group	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are	Minor

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	therefore considered minor and mitigated.	
Age	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	Minor
Marital status	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	Minor
Sexual orientation	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	Minor

Section 75 category	Details of policy impact	Level of impact? minor/major/none
Men and women generally	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	Minor
Disability	We do not expect there to be any adverse impact on people who have an intellectual or learning disability, as compared to those who do not have a physical, intellectual or learning disability. While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	Minor
Dependants	While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.	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	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals of different religious beliefs.
Political opinion	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals of differing political opinions.
Racial group	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals of different racial or ethnic backgrounds.
Age	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals of different age groups.

Section 75 category	If Yes , provide details	If No , provide reasons
Marital status	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals of different marital statuses.
Sexual orientation	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals of different sexual orientations.
Men and women generally	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals of different genders.
Disability	No.	The policy does not present any specific opportunities to further promote equality of opportunity between individuals with and without disabilities.
Dependants	No.	The policy does not present any specific opportunities to further

Section 75 category	If Yes , provide details	If No , provide reasons
		promote equality of opportunity between individuals with and without dependants.

3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? minor/major/none

Good relations category	Details of policy impact	Level of impact minor/major/none
Religious belief	The policy is expected to alleviate pressure on the Common Waiting List by enabling the recovery of social housing from individuals found to have committed tenancy fraud. Additionally, the policy may contribute to reducing the financial strain on public resources by decreasing reliance on high-cost temporary accommodation for those awaiting permanent housing.	None
Political opinion	The proposed changes to the tenancy fraud policy are not expected to impact good relations between individuals of differing political opinions. By addressing tenancy fraud and improving the allocation of social housing, the	None.

Good relations category	Details of policy impact	Level of impact minor/major/none
	policy aims to support fair access and reduce strain on public resources.	
Racial group	The proposed changes to the tenancy fraud policy are not expected to impact good relations between individuals of different racial or ethnic backgrounds. The policy seeks to enhance fairness in housing allocation by recovering properties from fraudulent tenancies.	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	N/A	The policy is not expected to offer an opportunity to better promote good relations between people of different religious belief.
Political opinion	N/A	The policy is not expected to offer an opportunity to better promote good relations between people of different political opinion.

Good relations category	If Yes , provide details	If No , provide reasons
Racial group	N/A	The policy is not expected to offer an opportunity to better promote good relations between people of different racial groups.

Additional considerations

Multiple identity

The proposed measures apply equally to all social housing applicants and tenants, without changes to eligibility or allocation criteria. Therefore, no specific adverse impacts have been identified for individuals with multiple Section 75 identities.

It is recognised, however, that certain groups experiencing multiple forms of disadvantage—such as disabled individuals, lone-parent households (predominantly women), and some minority ethnic families—are disproportionately represented among those in housing stress. Strengthening tenancy fraud legislation may offer indirect positive impacts for these groups by improving access to limited social housing stock.

Operational data from the Housing Executive, stakeholder engagement, findings from the NI Audit Office and Public Accounts Committee, and feedback from working groups have not indicated any differential risks for individuals with multiple identities. The public consultation process provides an additional opportunity to gather lived-experience insights from affected groups.

Relevant intersectional categories include:

- Disability × Gender / Dependants
- Minority Ethnic × Disability
- Minority Ethnic × Families in Housing Stress

Overall, no adverse differential impacts have been identified. Potential impacts are expected to be neutral or indirectly positive.

Part 3. Screening decision

In light of your answers to the previous questions, do you feel that the policy should: (please underline one)

1. Not be subject to an EQIA
2. **Not be subject to an EQIA (with mitigating measures /alternative policies)**
3. Be subject to an EQIA

If 1 or 2 (i.e. not be subject to an EQIA), please provide details of the reasons why:

While the policy is not expected to adversely impact individuals based on Section 75, enforcement action may require unlawful occupants to vacate properties. Any such action will be proportionate and subject to statutory safeguards; impacts are therefore considered minor and mitigated.

If 3. (i.e. to conduct an EQIA), please provide details of the reasons:

Mitigation

When the public authority concludes that the likely impact is 'minor' and an equality impact assessment is not to be conducted, the public authority may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

If so, **give the reasons** to support your decision, together with the proposed changes/amendments or alternative policy.

At this stage, no change to the proposed approach is considered necessary to better promote equality of opportunity or good relations. The core policy intention which is to strengthen legislation to deter and address social housing tenancy fraud, supports fairer allocation of scarce housing based on need, which is consistent with promoting equality across all Section 75 groups.

However, opportunities to enhance equality and good relations may be achieved through implementation measures rather than policy redesign, including:

- Targeted, inclusive engagement during consultation to ensure participation from under-represented groups;
- Clear communication on how the proposals promote fairness and protect legitimate applicants;
- Awareness-raising on reporting routes and support available.

These measures would help reinforce confidence that the strengthened framework is transparent, impartial and benefits all communities.

Reasoning:

The policy does not alter eligibility rules or allocation criteria and is intended to protect access for those in greatest housing need. Evidence reviewed to date has not identified adverse differential impacts; therefore, the policy does not

require amendment. Enhancing communication and engagement offers a proportionate means of further promoting equality and good relations.

Part 4. Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development.

You should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007).

The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

The Department will monitor the implementation of the proposed measures to strengthen legislation on social housing tenancy fraud to identify any unforeseen differential impacts on Section 75 groups. This will include consideration of feedback received during the public consultation and ongoing engagement with key sector stakeholders, including the Housing Executive and Registered Housing Associations.

Should monitoring indicate any emerging adverse impacts, further assessment including a full EQIA if required, will be undertaken. Monitoring will also inform future policy development and ensure that the proposals continue to support fair access to social housing.

Part 5 - Approval and authorisation

Screened by:	Position/Job Title	Date
Ursula Weir	Staff Officer	11/03/2026

Screened by:	Position/Job Title	Date
Approved by:	Liam Lavery GD7 SHP	24.03.2026

Note: A copy of the Screening Template, for each policy screened should be 'signed off' and approved by a senior manager responsible for the policy, made easily accessible on the public authority's website as soon as possible following completion and made available on request.