Department for
Communities
www.communities-ni.gov.uk

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

Debt Systems Replacement Project – Implementation of a replacement digital Debt Service to manage Debt Management Northern Ireland customer accounts and provide analytic solutions to support service delivery to customers.

Is this an existing, revised or a new policy? New

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

Background

The existing Debt Management Computer System (DMCS), the legacy debt management system used by both Debt Management in Great Britain and Debt Management Northern Ireland (DMNI), supports the administration and recovery of customer debt. While the system has provided a stable platform for many years, it is aging and no longer fully aligns with current digital, security and accessibility standards. As a result, there is an increasing need to modernise debt management processes to ensure the continued delivery of an efficient, secure and accessible service for customers and staff.

To address this, the Department for Work and Pensions (DWP) is implementing the Future Debt Solution (FDS), a modern debt management platform designed to replace DMCS. The Department for Communities (DfC) intends to implement FDS to maintain operational alignment with DWP and to ensure the continued provision of a supported debt management service. The introduction of FDS will provide a more sustainable platform for future service delivery, support improvements in system functionality and efficiency, and help ensure that debt management services continue to meet evolving business and customer needs.

Debt Systems Replacement Project (DSRP)

The Debt Systems Replacement Project (DSRP) was established to manage the implementation of these activities within DfC and in conjunction with FDS Project in DWP will:

- Replace the core DMCS utilised by the DWP and DfC;
- Automate core processes where appropriate, to facilitate quicker processing times;
- Ensure DfC maintains IT parity with DWP and access to a supported IT solution, utilising modernised technology to support debt management; and
- Safeguard DfC's access to a supported debt IT system ensuring continuity of recovery activities on behalf of the DfC to meet customer and Government expectations on the provision of modernised, efficient and digitised services.

Intended impact on the customer

FDS is an internal system used by authorised staff to administer and manage debt. Customers will not directly access or interact with FDS. Existing debt management policies, recovery rules and decision-making processes will continue to apply. The new system will be compliant with DWP departmental accessibility standards.

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

No

If Yes, explain how.

Who initiated or wrote the policy?
Department for Work and Pensions/Department for Communities

Who owns and who implements the policy?
DWP owns and maintains the Future Debt Solution (FDS). DfC implements and uses the system to administer debt management services for Northern Ireland customers.

Implementation factors

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

No

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

☐ service users

☐ other public sector organisations

☐ voluntary/community/trade unions

☐ other, please specify

Other policies with a bearing on this policy

What are they and who owns them?

NI Executive Programme for Government (PfG) 2024 - 2027
DfC Departmental Business Plan 2025-2026
DfC Benefit Fraud, Error and Debt Strategy 2024-2027 (Internal)
DMNI Business Plan 2026-2027 (Internal)
DfC IT Digital Strategy 2022-2027 (Internal)
Concordat between DWP and DfC (2018)
HM Treasury, Prevent. Resolve. Improve. 2026–2030 Government Debt Management Strategy

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[1]
Religious belief	Debt Management does not collect this information, and no evidence has been identified to suggest the implementation of FDS would affect this group differently from others. DSRP does not propose the collection or processing of additional data relating to religion or beliefs beyond that already available from other DWP/DfC systems.
Political opinion	Debt Management does not collect this information, and no evidence has been identified to suggest the implementation of FDS would affect this group differently from others. DSRP does not propose the collection or processing of additional data relating to political opinion beyond that already available from other DWP/DfC systems.
Racial group	Debt Management does not collect this information, and no evidence has been identified to suggest the implementation of FDS would affect this group differently from others. DSRP does not propose the collection or processing of additional data relating to an individual's race beyond that already available from other DWP/DfC systems.

<table>
<tr><th>Section 75 category</th><th>Details of evidence/information[1]</th></tr>
<tr><td>Age</td><td>
DSRP does not propose the collection or processing of additional data relating to an individual’s age beyond that already available from other DWP/DfC systems.
Information is currently available on the age of DMCS customers, which allows an understanding of the customer profile to inform research/decision making where relevant. The statistics for customers are broken down as follows:
<table>
<tr><th>Age Banding (Years Old)</th><th>Female</th><th>Male</th><th>Combined</th></tr>
<tr><td>Under 25</td><td>6,935</td><td>7,469</td><td>14,404</td></tr>
<tr><td>25-35</td><td>19,877</td><td>19,288</td><td>39,165</td></tr>
<tr><td>35-45</td><td>29,373</td><td>24,215</td><td>53,588</td></tr>
<tr><td>45-55</td><td>23,781</td><td>19,916</td><td>43,697</td></tr>
<tr><td>55-65</td><td>18,938</td><td>16,951</td><td>35,889</td></tr>
<tr><td>65-75</td><td>4,907</td><td>5,774</td><td>10,681</td></tr>
<tr><td>75-85</td><td>2,573</td><td>2,669</td><td>5,242</td></tr>
<tr><td>Over 85</td><td>3,078</td><td>1,999</td><td>5,077</td></tr>
<tr><td>Grand Total</td><td>109,462</td><td>98,281</td><td>207,743</td></tr>
</table>
(Figures correct as of 31st May 2026)
</td></tr>
<tr><td>Marital status</td><td>Debt Management does not collect this information, and no evidence has been identified to suggest the implementation of FDS would affect this group differently from others. DSRP does</td></tr>
</table>

Section 75 category	Details of evidence/information[1]
	not propose the collection or processing of additional data relating to an individual's marriage or civil partnership status.
Sexual orientation	Debt Management does not collect this information, and no evidence has been identified to suggest the implementation of FDS would affect this group differently from others. DSRP does not propose the collection or processing of additional data relating to an individual's sexual orientation.
Men and women generally	DSRP does not propose the collection or processing of additional data relating to gender. Information is currently held on the gender of customers on DMCS and is detailed below:

Age Banding (Years Old)	Female	Male	Combined
Under 25	6,935	7,469	14,404
25-35	19,877	19,288	39,165
35-45	29,373	24,215	53,588
45-55	23,781	19,916	43,697
55-65	18,938	16,951	35,889
65-75	4,907	5,774	10,681
75-85	2,573	2,669	5,242
Over 85	3,078	1,999	5,077
Grand Total	**109,462**	**98,281**	**207,743**

(Figures correct as of 31st May 2026)

Section 75 category	Details of evidence/information
Disability	Debt Management does not collect this information, and no evidence has been identified to suggest the implementation of FDS would affect this group differently from others. DSRP does not propose the collection or processing of additional data relating to an individual's stated disability beyond that already available from other DWP/DfC systems. DMNI will use details of disability benefits that have been paid if, for example, the reason for that customer's debt relates specifically to an overpayment of a disability benefit.
Dependants	Debt Management does not collect this information, and no evidence has been identified to suggest the implementation of

Section 75 category	Details of evidence/information[1]
	FDS would affect this group differently from others. DSRP does not propose the collection or processing of additional data relating to an individual's dependants beyond that already available from other DWP/DfC systems

Needs, experiences and priorities

Section 75 category	Details of needs/experiences/priorities
Religious belief	There is no evidence collected of any different needs, experiences or priorities in relation the implementation of these new systems for people of different religious beliefs.
Political opinion	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people with different political opinions.
Racial group	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people of different racial groups.
Age	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people of different ages.
Marital status	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people with different marital statuses
Sexual orientation	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people of different sexual orientation.

Section 75 category	Details of needs/experiences/priorities
Men and women generally	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people of different genders.
Disability	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people with disabilities. The new service changes will ensure compliance with accessibility requirements.
Dependants	There is no evidence collected of any different needs, experiences or priorities in relation to the implementation of these new systems for people with dependants.

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	This policy is not expected to have any adverse impact on equality of opportunity for people with different religious beliefs	None
Political opinion	This policy is not expected to have any adverse impact on equality of opportunity for people with different political opinion.	None
Racial group	This policy is not expected to have any adverse impact on equality of opportunity for people with different racial group	None
Age	This policy is not expected to have any adverse impact on equality of opportunity for people of different ages.	None
Marital status	This policy is not expected to have any adverse impact on equality of opportunity for people with different marital status.	None
Sexual orientation	This policy is not expected to have any adverse impact on equality of opportunity for people with different sexual orientation.	None
Men and women generally	This policy is not expected to have any adverse impact on equality of opportunity for men and women generally.	None
Disability	This policy is not expected to have any adverse impact on equality of opportunity for people with a disability.	None
Dependants	This policy is not expected to have any adverse impact on equality of opportunity for people with dependants.	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
Religious belief		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.
Political opinion		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.
Racial group		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.
Age		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.
Marital status		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further

Section 75 category	If **Yes**, provide details	If **No**, provide reasons
		promote equality of opportunity for this group.
Sexual orientation		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.
Men and women generally		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.
Disability		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.
Dependants		As this is a replacement IT system and does not change debt management policy, no specific opportunities have been identified to further promote equality of opportunity for this group.

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 not expected to have any impact on good relations for this group	None
Political opinion	The policy is not expected to have any impact on good relations for this group	None
Racial group	The policy is not expected to have any impact on good relations for this group	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, there is nothing within the project that would better promote good relations between people with different religious beliefs.
Political opinion		No, there is nothing within the project that would better promote good relations between people with different political opinion.

Good relations category	If **Yes**, provide details	If **No**, provide reasons
Racial group		No, there is nothing within the project that would better promote good relations between people with different racial group.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?
(*For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).*

No

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

N\A

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:

DSRP believes that this project should not be subject to an EQIA as the implementation of FDS will not adversely affect customers on the basis of their Section 75 characteristics. The primary driver for introducing the new computer system is to replace ageing infrastructure with a modern, industry standard solution that can be effectively maintained and supported, ensuring continuity of service.

DSRP are not proposing any processes and procedures that would materially alter the amount or frequency of customer repayments. However, system processes will be streamlined, where appropriate, to support more efficient administration of debt recovery activities. FDS will also support the identification of the most appropriate recovery channel based on a customer's circumstances.

No existing services are being removed. FDS will replace the current system interface used by DMNI agents to manage customer accounts, while existing debt management policies, and decision-making processes will remain in place. Therefore, DSRP considers that FDS will not result in differential treatment or discrimination on the basis of any Section 75 characteristic.

Analysis of equality impact: Staff

In delivering FDS, there are no plans to change the DM staff employment terms and conditions, under which staff are currently protected. Reasonable adjustments will not be impacted, reduced, or undermined by the implementation of FDS.

Guidance, learning and awareness training will be provided to support staff who use the new service. All necessary guidance and learning/awareness products will be developed in conjunction with DM staff and informed by user feedback to promote accessibility and usability by all staff members.

Assisted Digital

FDS will comply with relevant accessibility requirements and departmental accessibility standards. As part of the design phase in the development of the new systems, DWP Digital colleagues will carry out user research with DM agents following DWP accessibility design guidelines to ensure the services are accessibility compliant.

The introduction of FDS is not expected to result in a disproportionate impact on any group of customers or staff because of their Section 75 characteristics.

Decision making

DSRP is a system replacement project and does not introduce changes to debt management policy or decision-making principles. Decisions relating to debt recovery will continue to be applied in the same manner as they are currently applied through DMCS.
Throughout the lifetime of FDS, accessibility requirements and equality considerations will continue to be assessed as part of the design, development and implementation process.

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.

The current Debt Management Computer System is approaching the end of its lifespan. To ensure continuity of service and effective debt management, FDS must be implemented in line with the agreed programme timescales developed by DWP.

No alternative policy has been identified that would better meet the policy objectives. However, potential impacts will be mitigated through the implementation process, including ongoing consideration of customer needs and monitoring of any equality issues that may arise.

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 impact of the Future Debt Solution (FDS) will be monitored through existing governance arrangements including end stage reviews and a Project Evaluation Review. As well as this, customer and staff feedback, operational data and any issues raised by stakeholders to identify potential adverse impacts will be considered. Monitoring findings will inform future development and, should evidence emerge of significant adverse impacts on any Section 75 group, the Department will consider whether further assessment is required.

Part 5 - Approval and authorisation

Screened by:	**Position/Job Title**	**Date**
Stephen Donnelly	DSRP: FDS Strand Staff Officer	20/07/2026
Approved by:		
Julie Nelson	Acting Director Debt Management, Benefit Security, Child Maintenance NI & Make the Call Wraparound	31/07/2026

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.