

Equality and Human Rights Screening Template

The PHA is required to address the 4 questions below in relation to all its policies. This template sets out a proforma to document consideration of each question.

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)

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

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

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

For advice & support on screening contact:

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SCREENING TEMPLATE

See [Guidance Notes](#) for further information on the 'why' 'what' 'when', and 'who' in relation to screening, for background information on the relevant legislation and for help in answering the questions on this template.

(1) INFORMATION ABOUT THE POLICY OR DECISION

1.1 Title of policy or decision

Anti-Fraud and Anti-Bribery Policy Statement & Response Plan

1.2 Description of policy or decision

- **what is it trying to achieve? (aims and objectives)**
- **how will this be achieved? (key elements)**
- **what are the key constraints? (for example financial, legislative or other)**

This policy is intended to provide advice to all staff on their responsibilities to prevent and detect fraud or bribery and to report all cases of actual, suspected or potential of the same. The purpose of this document is to set out the PHA's position on fraud and bribery and thereby set the context for the ongoing efforts to reduce fraud and bribery to the lowest possible level and provide guidance in the Response Plan of what to do when reporting suspected cases of Fraud or Bribery

1.3 Main stakeholders affected (internal and external)

For example staff, actual or potential service users, other public sector organisations, voluntary and community groups, trade unions or professional organisations or private sector organisations or others

This policy is primarily for the attention of all staff within the organisation, particularly line managers, who need to be aware of their responsibilities in, not only minimising fraud and bribery, imbedding an anti-fraud and anti-bribery culture, but also ensuring that all incidents of suspected or actual fraud and bribery are reported to the Fraud Liaison Officer (FLO) within the PHA, for onward reporting to the BSO CFS.

It may be used by the public and may affect suppliers or other third parties (e.g. staff within community & voluntary sector) if a suspected Fraud is reported or as outlined in the Policy / Response Plan is reported.

1.4 Other policies or decisions with a bearing on this policy or decision

Whistleblowing Policy (where Fraud or Bribery is alleged).

Disciplinary policy(s) if sanctions have to be imposed on a member of staff

(2) CONSIDERATION OF EQUALITY AND GOOD RELATIONS ISSUES AND EVIDENCE USED

2.1 Data gathering

What information did you use to inform this equality screening? For example previous consultations, statistics, research, Equality Impact Assessments (EQIAs), complaints. Provide details of how you involved stakeholders, views of colleagues, service users, staff side or other stakeholders.

HRPTS staff data

Information on directions regarding Anti-Fraud and Anti-Bribery Policies from BSO Counter Fraud Services (CFS) / DoH (e.g. Circulars).

Review of HSC organisations Policies relating to this matter.

Review of Policy by BSO CFS.

Review of Policy by PHA Director of Finance and Assistant Director of Finance.

Guidance from the Northern Ireland Audit Office (NIAO) on Fraud.

2.2 Quantitative Data

Who is affected by the policy or decision? Please provide a statistical profile. Note if policy affects both staff and service users, please provide profile for both.

Category	What is the makeup of the affected group? (%) Are there any issues or problems? For example, a lower uptake that needs to be addressed or greater involvement of a particular group?	
Gender	Male	23.72%
	Female	76.28%
Age	16-24	1.92%
	25-29	5.34%
	30-34	9.19%
	35-39	10.26%

	40-44	13.46%
	45-49	15.17%
	50-54	17.74%
	55-59	15.17%
	60-64	8.97%
	>=65	2.78%
Religion	Perceived Protestant	2.99%
	Protestant	20.30%
	Perceived Roman Catholic	1.07%
	Roman Catholic	21.15%
	Neither	2.14%
	Perceived Neither	0.00%
	Not assigned	52.35%
Political Opinion	Broadly Nationalist	0.85%
	Other	4.49%
	Broadly Unionist	1.28%
	Not assigned	90.81%
	Do not wish to answer	2.56%
Marital Status	Divorced	0.85%
	Mar/CP	35.90%
	Other	0.64%
	Seperat	0.43%
	Single	10.68%
	Unknwn	51.28%
	Widw/R	0.21%
	Not assigned	0.00%
Dependent Status	Yes	5.77%
	Not assigned	89.74%
	No	4.49%
Disability	No	38.68%
	Not assigned	60.47%
	Yes	0.85%
Ethnicity	Not assigned	83.76%
	White	16.03%
	Other	0.21%
	Black African	0.00%

	Indian	0.00%	
	Chinese	0.00%	
Sexual Orientation	Do not wish to answer	1.07%	
	Not assigned	89.96%	
	Opposite sex	7.91%	
	same sex	1.07%	

2.3 Qualitative Data

What are the different needs, experiences and priorities of each of the categories in relation to this policy or decision and what equality issues emerge from this? Note if policy affects both staff and service users, please discuss issues for both.

Category	Needs and Experiences
Gender	No known issues
Age	No known issues
Religion	No known issues
Political Opinion	No known issues
Marital Status	No known issues
Dependent Status	No known issues
Disability	No known issues
Ethnicity	No known issues
Sexual Orientation	No known issues

2.4 Multiple Identities

Are there any potential impacts of the policy or decision on people with multiple identities? For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people.

N/A

2.5 Making Changes

Based on the equality issues you identified in 2.2 and 2.3, what changes did you make or do you intend to make in relation to the policy or decision in order to promote equality of opportunity?

<i>In developing the policy or decision what did you do or change to address the equality issues you identified?</i>	<i>What do you intend to do in future to address the equality issues you identified?</i>
N/A	N/A

2.6 Good Relations

What changes to the policy or decision – if any – or what additional measures would you suggest to ensure that it promotes good relations? (refer to guidance notes for guidance on impact)

<i>Group</i>	<i>Impact</i>	<i>Suggestions</i>
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Religion	N/A	
Political Opinion	N/A	
Ethnicity	N/A	

(3) SHOULD THE POLICY OR DECISION BE SUBJECT TO A FULL EQUALITY IMPACT ASSESSMENT?

A full equality impact assessment (EQIA) is usually confined to those policies or decisions considered to have major implications for equality of opportunity.

**How would you categorise the impacts of this decision or policy?
(refer to guidance notes for guidance on impact)**

Please tick:

Major impact	<input type="checkbox"/>
Minor impact	<input type="checkbox"/>
No further impact	<input checked="" type="checkbox"/>

Do you consider that this policy or decision needs to be subjected to a full equality impact assessment?

Please tick:

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Please give reasons for your decisions.

No impacts have been identified in the screening of this policy. It is not thought that undertaking an EQIA would present further opportunities to promote equality of opportunity.

(4) CONSIDERATION OF DISABILITY DUTIES

4.1 In what ways does the policy or decision encourage disabled people to participate in public life and what else could you do to do so?

<i>How does the policy or decision currently encourage disabled people to participate in public life?</i>	<i>What else could you do to encourage disabled people to participate in public life?</i>
N/A	N/A

4.2 In what ways does the policy or decision promote positive attitudes towards disabled people and what else could you do to do so?

<i>How does the policy or decision currently promote positive attitudes towards disabled people?</i>	<i>What else could you do to promote positive attitudes towards disabled people?</i>
N/A	N/A

(5) CONSIDERATION OF HUMAN RIGHTS

5.1 Does the policy or decision affect anyone's Human Rights?

Complete for each of the articles

ARTICLE	Yes/No
Article 2 – Right to life	No
Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment	No
Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour	No
Article 5 – Right to liberty & security of person	No
Article 6 – Right to a fair & public trial within a reasonable time	No
Article 7 – Right to freedom from retrospective criminal law & no punishment without law	No
Article 8 – Right to respect for private & family life, home and correspondence.	Yes
Article 9 – Right to freedom of thought, conscience & religion	No
Article 10 – Right to freedom of expression	No
Article 11 – Right to freedom of assembly & association	No
Article 12 – Right to marry & found a family	No
Article 14 – Prohibition of discrimination in the enjoyment of the convention rights	No
1 st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property	No
1 st protocol Article 2 – Right of access to education	No

*If you have answered no to all of the above please move on to **Question 6** on monitoring*

5.2 If you have answered yes to any of the Articles in 5.1, does the policy or decision interfere with any of these rights? If so, what is the interference and who does it impact upon?

List the Article Number	Interfered with? Yes/No	What is the interference and who does it impact upon?	Does this raise legal issues?*
			Yes/No
8	Potential interference	This relates to the highly sensitive nature of fraud investigations. If names of individuals subject to investigation were not kept private, their human right to privacy would potentially be breached. The steps in place to ensure security of this data mitigate this.	No

** It is important to speak to your line manager on this and if necessary seek legal opinion to clarify this*

5.3 Outline any actions which could be taken to promote or raise awareness of human rights or to ensure compliance with the legislation in relation to the policy or decision.

All individuals who report fraud or are suspected of committing fraud have a right to privacy and all information will be treated

confidentially by the staff involved. There are restrictions of access to such information – only those staff directly involved will have access – e.g. the Fraud Liaison Officer, Counter Fraud and Probitry Services staff, Investigating Officer,

(6) MONITORING

6.1 What data will you collect in the future in order to monitor the effect of the policy or decision on any of the categories (for equality of opportunity and good relations, disability duties and human rights)?

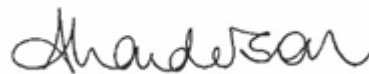
Equality & Good Relations	Disability Duties	Human Rights
N/A	N/A	N/A

Approved Lead Officer: Lyn Benson

Position: Fraud Liaison Officer HSCB/PHA

Date: 13/01/22

Policy/Decision Screened by: Andrea Henderson



Business Unit and contact details AD Finance HSCB/PHA
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Please note that having completed the screening you are required by statute to publish the completed screening template, as per your organisation's equality scheme. If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, you will need to review the screening decision.

**Please forward completed template to:
Equality.Unit@hscni.net**

Template updated January 2015

Any request for this document in another format or language will be considered. Please contact us (see contact details provided above).