

Equality, Good Relations and Human Rights SCREENING

The Health and Social Care Board is required to consider the likely equality implications of any policies or decisions. In particular it is asked to consider:

- 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 or none)
- 2) Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?
- 3) 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 or none)
- 4) Are there opportunities to better promote good relations between people of a different religious belief, political opinion or racial group?

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.

As part of the audit trail documentation needs to be made available for all policies and decisions examined for equality and human rights implications. The screening template is a pro forma to document consideration of each screening question.

For information (evidence, data, research etc) on the Section 75 equality groups see the Equality and Human Rights Information Bank on the BSO website:

<http://www.hscbusiness.hscni.net/services/1798.htm>

Equality, Good Relations and Human Rights SCREENING 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

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 HSCB'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 HSCB, for onward reporting to the BSO CFS.

It may inadvertently affect suppliers or other third parties (e.g. staff within GP practices, Community Pharmacy, Dental or Ophthalmic practices) if a suspected Fraud occurs or a member of the public if suspected Fraud 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

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 HSCB Director of Finance and Assistant Director of Finance.

Engagement with relevant staff within the Directorate of Integrated Care, particularly in respect of the Response Plan relating to suspected Fraud by Practitioners (Pharmacy and Medicines Management, Ophthalmic, Dental and general medical Services) and suspected prescription fraud by members of the public.

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

2.1 Data Gathering

What information did you use to inform this equality screening?

Provide details of how you involved stakeholders, views of colleagues, service users, staff side or other stakeholders.

(See table above)

2.2 Quantitative Data

Who is affected by the policy or decision? Please provide a statistical profile.

Category	<i>What is the makeup of the affected group? (%) Are there any issue or problems? For example, a lower uptake that needs to be addressed or greater involvement of a particular group?</i>		
Gender	Male	26.88%	
	Female	73.12%	
Age	16-24	0.59%	
	25-29	3.75%	
	30-34	6.32%	
	35-39	10.67%	
	40-44	16.01%	
	45-49	15.81%	
	50-54	22.92%	
	55-59	15.61%	
	60-64	6.92%	
	>=65	1.38%	
Religion	Perceived Protestant	3.75%	
	Protestant	28.85%	
	Perceived Roman Catholic	1.78%	
	Roman Catholic	43.68%	
	Neither	5.14%	
	Perceived Neither	0.00%	
Political Opinion	Not assigned	16.80%	
	Broadly Nationalist	2.37%	
	Other	2.37%	
	Broadly Unionist	1.58%	
	Do not wish to answer	2.96%	
Marital Status	Not assigned	90.71%	
	Divorced	3.95%	
	Mar/CP	54.35%	
	Other	1.38%	
	Seprart	1.38%	
	Single	13.64%	
	Unknwn	25.30%	
	Widw/R	0.00%	
Dependent Status	Not assigned	0.00%	
	Yes	10.87%	
	No	3.16%	

Disability	No	59.09%	
	Not assigned	38.74%	
	Yes	2.17%	
Ethnicity	Not assigned	65.42%	
	White	34.39%	
	Other	0.00%	
	Black African	0.00%	
	Indian	0.00%	
	Chinese	0.20%	
Sexual Orientation	Do not wish to answer	0.40%	
	Not assigned	89.13%	
	Opposite sex	9.88%	
	same sex	0.40%	
	Both sexes	0.20%	

It should be noted that the Policy and Response Plan is applicable to all staff members who should comply with the Policy aim to ensure that an anti-fraud and anti-bribery culture is embedded within the organisation.

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

For the purposes of this section, the Policy / Response Plan does not directly affect service users aside from ensuring that any / all incidents involving them are reported to the HSCB and taken forward for action.

2.3 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

2.4 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</i>	<i>What do you intend to do in future to address the equality issues you identified?</i>
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<i>identified?</i>	
	<ul style="list-style-type: none"> •

2.5 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>
Religion	N/A	
Political Opinion	N/A	
Ethnicity		

(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	
Minor impact	
No further impact	x

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

Please tick:

Yes	
No	x

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 Are Human Rights relevant?

Complete for each of the articles

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

*If you have answered no to all of the above please move onto to 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 have a potential positive impact or does it potentially interfere with anyone’s Human Rights?

List the Article Number	Positive impact or potential interference?	How?	Does this raise any legal issues?*
			Yes/No
8	Potential interference	If names not kept private	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 Liason Officer, Counter Fraud and Probity Services staff, Investigating Officer, Business Manager in Integrated Care etc.

(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

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Approved Lead Officer: Lyn Benson

Position: Fraud Liaison Officer HSCB / PHA

Policy/Decision Screened by: Andrea Henderson



Signed:

Date: 13/7/21

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 produced November 2011

If you require this document in an alternative format (such as large print, Braille, disk, audio file, audio cassette, Easy Read or in minority languages to meet the needs of those not fluent in English) please contact the Equality Unit:

2 Franklin Street; Belfast; BT2 8DQ; email: Equality.Unit@hscni.net;
phone: 028 95363961 (for Text Relay prefix with 18001); fax: 028 9023
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