



Equality and Human Rights Screening Template

The BSO is required to address the 4 questions below in relation to all its policies.

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?

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 Portal

<https://bso.hscni.net/directorates/people-and-place/equality-and-human-rights/equality-screening/>

For advice and support on screening contact:

Equality Unit/ BSO /James House/ 2-4 Cromac Avenue/ Belfast/
BT7 2JA/ Tel:02895 363961

SCREENING TEMPLATE

(1) INFORMATION ABOUT THE POLICY OR DECISION

1.1 Title of policy or decision

BSO Fraud Policy and Fraud 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)**

The Fraud Policy, incorporating the Fraud Response Plan, sets out the BSO's commitment and approach to the prevention, detection, investigation and reporting of fraud, bribery and corruption. It establishes a clear framework for promoting an anti-fraud culture across the organisation and demonstrates zero tolerance towards fraudulent activity.

The Policy defines what constitutes fraud and outlines the responsibilities of all staff, managers and key officers in preventing, identifying and reporting actual or suspected fraud. It also provides clear and mandatory procedures for responding to suspected or confirmed fraud, including escalation, investigation and reporting arrangements.

The Policy aligns with the Fraud Act 2006, the Economic Crime and Transparency Act 2023, relevant Department of Health (DoH) guidance and standards, and recognised good governance practice.

The aims and objectives of the Fraud Policy and Fraud Response Plan are to:

- Prevent fraud, bribery and corruption through strong governance, effective controls and staff awareness
- Promote a robust anti-fraud culture in which all staff understand their responsibilities and are encouraged to report concerns
- Ensure timely detection and effective investigation of suspected or actual fraud
- Provide clear and consistent procedures for reporting, investigating and responding to fraud
- Ensure compliance with legislative, regulatory and departmental counter-fraud requirements
- Protect public funds, assets and the reputation of BSO

Key elements of the Fraud Policy and incorporated Fraud Response Plan include:

- A clear definition of fraud and related offences
- Roles and responsibilities of staff, managers, the Fraud Liaison Officer, Internal Audit and Counter Fraud Services
- Mandatory procedures of reporting actual or suspected fraud

- Arrangements for investigation, escalation and referral to external bodies where appropriate
- Requirements for monitoring, learning lessons and continuous improvement.

The implementation and operation of the Fraud Policy are subject to a number of constraints, including:

Financial Constrains:

- Availability of resources to support fraud prevention activity, investigation, training and awareness- raising

Legislative and Regulatory Constrains:

- Compliance with relevant legislation, including data protection, employment law and criminal justice requirements

Operational and Organisational Constrains:

- Dependence on external bodies (e.g. Counter Fraud Services (CFS), PSNI for certain investigations or outcomes

Despite these constrains, the BSO remains committed to maintaining effective counter-fraud arrangements and ensuring that all allegations of fraud are treated seriously, investigated appropriately and reported in line with governance requirements.

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

Public and all those working for BSO.

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

- **what are they?**
- **who owns them?**

This Policy together with BSO Fraud Response plan form part of the BSO Standing Financial Instructions, Cyber Policies and Standards and BSO Raising a Concern in the Public Interest (Whistleblowing) as approved by BSO Board and in operation across the organisation.

This Policy is in conjunction with DoH Sanctions and Redress Policy and DoH Counter Fraud Strategy.

(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.

To inform this equality screening, recent statistics were taken from:

- Census 2021 Report
- Election Report: Northern Ireland Assembly election, 5 May 2022.

To inform the BSO employee data, engagement has been made with the HR department to obtain the data presented below, which was the most recent BSO employee data as of September 2025.

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. Also give consideration to multiple identities.

Category	<i>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?</i>	
	Population NI	BSO Staff
Gender	Male – 49.2% (936,132) Female – 50.8% (967,043) (total population of 1,903,175) No questions relating to gender identity were asked in the NI Census.	Male – 47.34% Female – 52.66% Transgender - 0
Age	Age band / Population Percentage 0-14 365,200 19.2% 15-39 594,400 31.2% 40-64 617,100 32.4% 65-84 287,100 15.1% 85+ 39,400 2.1% All ages 1,903,200 100%	16-24 = 4.21% 25-29 = 9.72% 30-34 = 11.15% 35-39 = 14.44% 40-44 = 13.88% 45-49 = 13.70% 50-54 = 12.54% 55-59 = 11.66% 60-64 = 6.48% 65+ = 2.22%
Religion	Current Religion • ‘no religion’ (17.4%)	Perceived Protestant 1.71% Protestant 24.25% Perceived Roman Catholic

	<ul style="list-style-type: none"> • 'religion not stated' (1.6%) • Catholic (42.3%) • Presbyterian Church in Ireland (16.6%) • Church of Ireland (11.5%) • Methodist (2.4%) • Other Christian denominations (6.9%) • Other non-Christian Religions (1.3%). <p>Religion/religion of upbringing (Number / Percentage)</p> <p>Catholic 869,800 45.7%</p> <p>Current religion 805,200 42.3%</p> <p>Religion of upbringing 64,600 3.4%</p> <p>Protestant and other Christian (including Christian related) 827,500 43.5%</p> <p>Current religion 711,000 37.4%</p> <p>Religion of upbringing 116,600 6.1%</p> <p>Other religions 28,500 1.5%</p> <p>Current religion 25,500 1.3%</p> <p>Religion of upbringing 3,000 0.2%</p> <p>None 177,400 9.3%</p> <p>All usual residents 1,903,200 100%</p>	<p>1.43%</p> <p>Roman Catholic 36.46%</p> <p>Neither 6.39%</p> <p>Perceived Nether 0.05%</p> <p>Not assigned 29.71%</p>
<p>Political Opinion</p>	<p>National identity (nationality based) (Number - Percentage)</p> <ul style="list-style-type: none"> • British 814,600 42.8% • Irish 634,000 33.3% • Northern Irish 598,800 31.5% • English 16,800 0.9% • Scottish 10,200 0.5% • Welsh 2,000 0.1% • Other national identities 113,400 6.0% <p>National identity (person based) (Number / Percentage)</p> <ul style="list-style-type: none"> • British only 606,300 31.9% • Irish only 554,400 29.1% • Northern Irish only 376,400 19.8% • British & Northern Irish only 151,300 8.0% • Irish & Northern Irish only 33,600 1.8% • British, Irish & Northern Irish only 28,100 1.5% • British & Irish only 11,800 0.6% • English only/Scottish only/Welsh only 16,200 0.9% • Other combination of British/Irish/Northern • Irish/English/Scottish/Welsh only 11,700 0.6% • Other national identities 113,400 6.0% • Polish only 23,900 1.3% • Lithuanian only 11,900 0.6% • Romanian only 7,100 0.4% • Portuguese only 6,900 0.4% 	<p>Broadly Nationalist 3.56%</p> <p>Other 4.53%</p> <p>Broadly Unionist 3.42%</p> <p>Not assigned 82.55%</p> <p>Do not wish to answer 5.92%</p>

	<ul style="list-style-type: none"> • Bulgarian only 4,300 0.2% • Indian only 4,100 0.2% • Other national identity with one or more of British/Irish/Northern Irish/English/Scottish/Welsh only 12,700 0.7% • Other national identities 42,600 2.2% • All usual residents 1,903,200 100.00% <p>Assembly Election 2022: Sinn Fein – 29% DUP - 21.3 % Alliance Party – 13.5% UUP – 11.2% SDLP 9.1% TUV – 7.6% Green – 1.9% PBPA – 1.1% Independents / Others 5.2%</p>	
Marital Status	<ul style="list-style-type: none"> • 45.59% (690, 509) of those aged 16 or over were married • 38.07% (576, 708) were single • 0.18% (2,742) were registered in civil partnerships (more than double since 2011) • 6.02% (91,128) were either divorced or formerly in a civil partnership which is now legally dissolved • 6.36% (96, 384) were either widowed or a surviving partner from a civil partnership • 3.78% (57, 272) were separated (but still legally married or still legally in a civil partnership) 	Divorced 1.53% Married/CP 32.53% Other 1.02% Separated 0.28% Single 10.50% Unknown 53.40% Widow/R 0.56% Not assigned 0.19%
Dependent Status	<p>('Provision of unpaid care' covers looking after, giving help or support to anyone because they have long-term physical or mental health conditions or illnesses, or problems related to old age. It excludes any activities carried out in paid employment.)</p> <p>Northern Ireland All usual residents aged 5 and over 1,789,348 Percentage of usual residents aged 5 and over who provide: No unpaid care 87.58% 1-19 hours unpaid care per week 5.63% 20-34 hours unpaid care per week 1.38% 35-49 hours unpaid care per week 1.57% 50+ hours unpaid care per week 3.84%</p>	Yes 11.06% Not assigned 81.49% No 7.45%
Disability	<p>Out of all usual residents (n=1,903,179), the Percentage of usual residents whose day-to-day activities are: Limited a lot – 11.45%</p>	No 31.47% Not assigned 66.64% Yes 1.90%

	<p>Limited a little – 12.88% Not limited – 75.67% ('Day-to-day activities limited' covers any health problem or disability (including problems related to old age) which has lasted or is expected to last for at least 12 months.) The breakdown of the various long-term conditions as outlined in the 2021 Census is:</p> <table border="1" data-bbox="405 524 1107 1384"> <thead> <tr> <th>Type of long-term condition</th> <th>Percentage of population with condition %</th> </tr> </thead> <tbody> <tr> <td>Deafness or partial hearing loss</td> <td>5.75</td> </tr> <tr> <td>Blindness or partial sight loss</td> <td>1.78</td> </tr> <tr> <td>Mobility of Dexterity Difficulty that requires wheelchair use</td> <td>1.48</td> </tr> <tr> <td>Mobility of Dexterity Difficulty that limits basic physical activities</td> <td>10.91</td> </tr> <tr> <td>Intellectual or learning disability</td> <td>0.89</td> </tr> <tr> <td>Learning difficulty</td> <td>3.5</td> </tr> <tr> <td>Autism or Asperger syndrome</td> <td>1.86</td> </tr> <tr> <td>An emotional, psychological or mental health condition</td> <td>8.68</td> </tr> <tr> <td>Frequent periods of confusion or memory loss</td> <td>1.99</td> </tr> <tr> <td>Long – term pain or discomfort.</td> <td>11.58</td> </tr> <tr> <td>Shortness of breath or difficulty breathing</td> <td>10.29</td> </tr> <tr> <td>Other condition</td> <td>8.81</td> </tr> </tbody> </table>	Type of long-term condition	Percentage of population with condition %	Deafness or partial hearing loss	5.75	Blindness or partial sight loss	1.78	Mobility of Dexterity Difficulty that requires wheelchair use	1.48	Mobility of Dexterity Difficulty that limits basic physical activities	10.91	Intellectual or learning disability	0.89	Learning difficulty	3.5	Autism or Asperger syndrome	1.86	An emotional, psychological or mental health condition	8.68	Frequent periods of confusion or memory loss	1.99	Long – term pain or discomfort.	11.58	Shortness of breath or difficulty breathing	10.29	Other condition	8.81	
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Ethnicity	<p>In the general population the 2021 Census indicated that 3.4% (65,600) of the usual resident population belonged to minority ethnic groups.</p> <p>Ethnic Group</p> <p>Ethnic Group / Ethnic Group Number Percentage</p> <p>White 1,837,600 96.6%</p> <p>Minority Ethnic Group 65,600 3.4%</p> <p>Black 11,000 0.6%</p> <p>Indian 9,900 0.5%</p> <p>Chinese 9,500 0.5%</p> <p>Filipino 4,500 0.2%</p> <p>Irish Traveller 2,600 0.1%</p> <p>Arab 1,800 0.1%</p> <p>Pakistani 1,600 0.1%</p> <p>Roma 1,500 0.1%</p>	<p>Not assigned 77.09%</p> <p>White 22.30%</p> <p>Other 0.09%</p> <p>Black African 0.05%</p> <p>Indian 0.28%</p> <p>Filipino 0.05%</p> <p>Mixed Ethnic Group 0.09%</p> <p>Chinese 0.05%</p>																										

	<p>Mixed Ethnicities 14,400 0.8% Other Asian 5,200 0.3% Other Ethnicities 3,600 0.2% All usual residents 1,903,200 100.0%</p> <p>Country of birth Country of birth / Number Percentage Northern Ireland 1,646,300 86.5% Great Britain 92,300 4.8% England 72,900 3.8% Scotland 16,500 0.9% Wales 2,800 0.2% Republic of Ireland 40,400 2.1% Outside United Kingdom and Ireland 124,300 6.5% Europe (other EU countries) 67,500 3.5% Europe (other non-EU countries) 3,700 0.2% Other Countries in the World 53,100 2.8% All usual residents 1,903,200 100.0%</p> <p>Main language of usual residents aged 3 and over Main language / Number Percentage English 1,751,500 95.4% Main language not English 85,100 4.6% Polish 20,100 1.1% Lithuanian 9,000 0.5% Irish 6,000 0.3% Romanian 5,600 0.3% Portuguese 5,000 0.3% Arabic 3,600 0.2% Bulgarian 3,600 0.2% Other languages 32,200 1.8% All usual residents aged 3 and over 1,836,600 100%.</p>	
Sexual Orientation	<p>Straight or heterosexual: 90.04% (1,363,859) • Gay or lesbian: 1.17% (17,713) • Bisexual: 0.75% (11,306) • Other sexual orientation: 0.17 (2,597) • Prefer not to say: 4.58% (69,307) • Not stated: 3.3% (49,961)</p>	<p>Do not wish to answer 1.34% Not assigned 82.28% Opposite sex 15.50% Both sexes 0.19% Same sex 0.69%</p>

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. Also consider multiple identities (such as single parents for example).

Category	Needs and Experiences
Gender	No specific equality issues have been identified. The Fraud Policy and Fraud Response Plan are applied consistently regardless of gender. Investigations and decision-making process are evidence-based and do not differentiate on the basis of gender.
Age	No direct equality issues have been identified. However , it is recognised that younger or older service users may have varying levels of understanding of fraud risks and reporting processes. Clear guidance and support are therefore important to ensure all individuals can understand their responsibilities and rights under the policy.
Religion	No equality issues have been identified. The policy does not conflict with religious practices or beliefs and is applied consistently. Any interviews or investigations will be conducted respectfully and reasonable adjustments considered when required.
Political Opinion	No equality issues have been identified. The Fraud Policy and Fraud Response Plan are neutral and unrelated to political opinion, ensuring impartial application.
Marital Status	No equality issues have been identified. The policy applies equally regardless of marital or family status.
Dependent Status	No direct equality issues have been identified. However , it is recognised that individual with caring responsibilities may require flexibility during fraud investigations (e.g. interview times or access to support). Reasonable consideration will be given to minimise undue stress while maintaining the integrity of the process.
Disability	Staff and service users with disabilities may have additional communication or accessibility needs when engaging with fraud prevention information, reporting mechanisms or investigation processes. Reasonable adjustments will be made in line with the organisation's Accessible Formats Policy , including accessible documentation, alternative communication methods and appropriate support during investigations.
Ethnicity	People whose first language is not English experience barriers in understanding fraud-related information or procedures. To mitigate this, accessible information and support will be provided in line with the Accessible Formats Policy , including clear language and where appropriate, translated materials or interpretation support.
Sexual Orientation	No equality issues have been identified. The policy is applied consistently and fairly and confidentiality is maintained throughout fraud reporting and investigation processes.

2.4 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>
<p>This policy forms part of a required cyclical review of the existing Fraud Policy and Fraud Response Plan, last reviewed in 2023.</p> <p>Accessibility and communication needs were considered during the review. Reasonable adjustments and alternative formats are available to support staff or service users with disabilities to access or submit information.</p>	<p>No additional equality issues were identified during the screening.</p> <p>The Fraud Policy and Fraud Response Plan will continue to be reviewed every three years, with equality impacts and accessibility requirements considered as part of each review.</p>

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 across all areas.	N/A
Political Opinion	N/A	N/A
Ethnicity	N/A	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	
Minor impact	x
No further impact	

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

Please tick:

Yes	
No	x

No. A full equality impact assessment is not required. Policy screened out with mitigation.

The BSO Fraud Policy and BSO Fraud Response Plan are overarching governance documents that apply equally to all staff and service users. No significant or disproportionate impact on any protected group has been identified through the initial screening. Any potential equality considerations are mitigated through the provision of reasonable adjustments, accessible information and fair, evidence-based processes.

This policy will continue to be monitored and reviewed as part of the regular review cycle and a full equality impact assessment might be considered/ undertaken if any material equality issues are identified in the future.

(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>
The policy supports disabled people to participate by providing accessible information, alternative formats and reasonable adjustments when reporting concerns or engaging with investigations.	Continue to promote awareness of reasonable adjustments, review accessibility of reporting processes and ensure staff to support disabled people to engage confidently with fraud reporting and investigations.

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>
The policy promotes positive attitudes by reasonable adjustments and respectful engagement with disabled people throughout fraud reporting and investigation processes.	Promote inclusive and respectful behaviour when applying the policy.

(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.	NO
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

** 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.

(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
Monitoring data on fraud referrals, investigations and outcomes, to identify any disproportionate impacts or trends.	Data on requests for reasonable adjustments, use of accessible formats and any feedback from disabled staff or service users on accessibility of fraud reporting and investigation processes.	N/A

Approved Lead Officer:

Hannah Francis

Position:

Assistant Director of Finance

Contact Details

Hannah.Francis@hscni.net

Date:

28/01/2026

Policy/Decision Screened by:

Marzena Nowacka,
Finance Governance Manager

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**

Any request for the document in another format or language will be considered. Please contact the Equality Unit:

Equality Unit/ BSO /James House/ 2-4 Cromac Avenue/ Belfast/ BT7 2JA/
Tel:02895 363961