

# **POLICY SCREENING FORM**

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## **Background**

**Under Section 75 of the Northern Ireland Act 1998, the College is required to have due regard to the need to promote equality of opportunity:**

- **between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;**
- **between men and women generally;**
- **between persons with a disability and persons without; and,**
- **between persons with dependants and persons without.**

**Without prejudice to the obligations set out above, the College is also required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.**

## **Screening**

The screening procedure should lead to one of two conclusions:

- The policy being screened does not have a significant impact on equality of opportunity and therefore does not require an EQIA
- The policy being screened has (or is likely to have) a significant impact on equality of opportunity and may require an EQIA.

## Scoping the Policy

<b>Title of Policy:</b>	NHA Fraud Management Policy (v3) – May 2025
<b>Policy Aim:</b>	The aim of this policy is to provide a framework for the development of policies and measures to counter fraud.
<b>Policy Ref:</b>	F&CS003
<b>Brief Description:</b>	<p>This policy gives sets out the responsibilities of all staff and Board Members regarding the prevention of fraud and the action to be taken where a fraud is suspected or detected.</p> <p>The policy covers fraud and loss within the Association and applies to staff, members of the Board and members of the public and contractors, it also includes tenancy-related fraud.</p> <p>A fraud response plan is also in place with written instructions, which acts as a guide when action is to be taken in individual cases, and prevent staff and Board Members from taking any action, which would make prosecution difficult.</p>

### **Who defines or defined the policy?**

The Association's Board of Management, CEO and relevant Director(s) defined this policy.

### **Who implements the policy?**

Newington Housing Association employees implement this policy.

### **Is the policy applied uniformly throughout the organisation? *If NO, what are the consequences***

Yes

### **Who are the main stakeholders in relation to the policy?**

The main stakeholders are identified as NHA Board, key staff and any other relevant stakeholders or statutory bodies.

### **What factors/forces could contribute/detract from the aim or implementation of the policy?**

None

## How do we interface with other bodies in relation to implementation of this policy?

We interface with other bodies in relation to implementation of this policy via our day-to-day operational activities and through audits and regulatory assessments.

## Which other policies are related to this policy?

This policy lies within our F&CS Directorate and is overseen and reviewed by the appointed Director. Other associated policies are:

- Financial Regulations Policy
- Treasury Management Policy

## What data is currently available to facilitate the screening of this policy?

N/A

### **Answering the Four Screening Questions**

The four questions ask for evidence in relation to the Section 75 dimensions. You should not think of the “don’t know” column in the form as the easy option to respond to any of the questions. In cases where you don’t know and you don’t have data, you will need to make a judgement based on experience as to whether the policy you are screening may have an impact on any of the nine dimensions. If your judgement is that the policy may have a differential adverse impact in relation to any of the Section 75 dimensions (i.e. it affects some groups differently and less favourably than other groups), you should seek to obtain evidence. You should note that evidence can be qualitative – i.e. drawn from the experience of individuals from their perspective - as well as quantitative. Officers must give consideration to steps that they could reasonably be expected to take to obtain evidence and thereby inform their decision-making. Such steps could include meeting with a representative group or selective consultation.

**Where there is little or no evidence, and common sense indicates that a differential impact may be expected, you should discuss this with the Equality Officer.**

## 1. Is there any evidence of higher or lower participation or uptake by different groups?

	Yes	No	Not known
Religious belief		X	
Political opinion		X	
Racial group		X	
Age		X	
Marital status		X	
Sexual orientation		X	
Gender		X	
Disability		X	
Dependency		X	

Please comment: N/A

**2. Do different groups have different needs, experiences, issues and priorities in relation to this policy issue?**

	Yes	No	Not known
Religious belief		X	
Political opinion		X	
Racial group		X	
Age		X	
Marital status		X	
Sexual orientation		X	
Gender		X	
Disability		X	
Dependency		X	

Please comment: N/A

**3. Have consultations with relevant groups, organisations or individuals indicated that policies of this type create problems that are specific to them?**

	Yes	No
Religious belief		X
Political opinion		X
Racial group		X
Age		X
Marital status		X
Sexual orientation		X
Gender		X
Disability		X
Dependency		X

This policy was developed to ensure that sufficient policies and systems are in place to mitigate and prevent fraud from occurring within the organisation and procedural guidance for staff clarity on how to administer, monitor or report any cases of suspected fraud.

**4. In relation to implementing this policy, is there an opportunity to better promote equality of opportunity or good relations by altering the policy or by working with others in Government or in the larger community?**

Yes  No

**5. With reference to Questions 1 to 4 please summarise how you believe the policy may impact on the organisation's obligation to have due regard to the need to promote equality of opportunity.**

We do not believe the policy impacts on the organisation's obligation to have due regard to the need to promote equality of opportunity.

**6. What data do you believe will be required to ensure effective monitoring of the policy following implementation?**

Via completion and recording of Referral Form for Suspected Fraud for Serious Irregularity and completion and monitoring of our Fraud Register, which is reported to our Board and submitted to the Department of Communities on a quarterly basis.

**7. In the context of Question 3 are there any relevant groups which you believe should be consulted at this time? Please specify**

There are no relevant groups which we believe should be consulted at this time.

**8. Any other comments on the policy and/or screening exercise?**

No

**9. On the basis of answers to Questions 1 to 4 above (and in particular positive answers), do you recommend that the policy should be subjected to a full impact assessment?**

Yes

No

Please elaborate

**Newington Housing Association Policy Screening Outcome**

**Is this a new policy?**

No

**If yes, confirm the date on which the policy was screened in relation to opportunity of equality & promotion of good relations?**

N/A

**If this is a review of an existing policy – have there been significant changes.**

Yes, but no significant changes have been made to the previous version which would have an impact on equality of opportunity.

**If yes, confirm the date on which the policy was screened in relation to opportunity of equality & promotion of good relations?**

26<sup>th</sup> May 2025

**N.B. If an EQIA is recommended, please continue and complete an EQIA. If an EQIA is not recommended, please sign and date this form and ensure that the reason for not recommending is made clear.**

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**Policy Screening Decision**

The policy that has screened does not have a significant impact on equality of opportunity and therefore does not require an EQIA.

**Screened by: Glenn Ashfield**

**Date: 26/05/2025**

**Approved by: Anthony Kerr**

**Date: 26/05/2025**

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