EQUALITY SCREENING PRO - FORMA

Policy Title: Anti-Bribery and Gifts and Hospitality Policy

Decision: Screen Out

Contact: Clare Jamison

Date of Completion: 3 November 2026

Part 1: Policy Scoping

Information about the policy

Name of the Policy
Anti-Bribery and Gifts and Hospitality Policy

Is this an existing, revised, or new policy?
Revised

What is it trying to achieve? (For example, intended aims and outcomes)
The Policy sets out to ensure that the University is compliant with The Bribery Act 2010 and that the University maintains the highest ethical standards and carries out all its activities fairly, honestly, openly and in compliance with all applicable laws.

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

No, this Policy is designed to ensure that all staff are compliant with The Bribery Act 2010 and that University maintains the highest ethical standards and carries out all its activities fairly, honestly, openly and in compliance with all applicable laws.

Who initiated or wrote the policy?
The University Secretary initiated and the Governance and Policy Manager and Policy and Legal Services Officer wrote the policy.

Who owns and implements the policy?
The University Secretary owns and is responsible for implementation of the policy.

Implementation factors

Are there any factors which could contribute to or weaken the intended aim or outcome of the policy?

Yes

If yes, are they financial, legislative or other?

Legislative: Amendments to the Bribery Act

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

- Staff
- Other:
    - External and co-opted members on Council and Council Committees
    - Anyone affiliated to the University through honorary contracts (for example, visiting academics, visiting researchers and honorary academics)
    - All third parties retained by the University to perform services for, and on behalf of, the University.

Other policies with a bearing on this policy

Policy: Financial Regulations
Policy owner: Chief Strategy and Finance Officer

Policy: Procurement Policy
Policy owner: Chief Strategy and Finance Officer

Policy: Fraud and Theft Response Procedure
Policy owner: Chief Finance and Strategy Officer

Policy: Raising Concerns (Whistleblowing) Policy
Policy owner: University Secretary

Policy: Anti Money Laundering Policy
Policy owner: Chief Finance and Strategy Officer

Policy: Direct Award Contracts Policy
Policy owner: Chief Finance and Strategy Officer

Policy: Tender Procedures
Policy owner: Chief Finance and Strategy Officer

Available evidence

What evidence or information (both qualitative and quantitative) have you gathered to inform this policy?

Religious Belief

The University's EO data were reviewed. On 6 February 2026, our staff profile was 53.9% Catholic and 46.1% Protestant. Compared with 6 February 2021, this indicates a 3.9% increase in Catholic staff.

Political Opinion

The University does not collect information on Political Opinion or make assumptions regarding Political Opinion based on Community Background.

Racial Group

The University's EO data were reviewed. On 6 February 2026, our staff profile was 92.0% White and 8.0% Black and Minority Ethnic (BME). This indicates a 2% increase in BME staff compared with 2021.

Our BME profile suggests that we are twice as diverse as the local population, as the Northern Ireland Census 2021 suggests that 3.4% of the NI population is BME.

Age

The University's EO data were reviewed. On 6 February 2026, 29.7% of our staff were in the 46-55 age band and 26.0% of staff were in the 36-45 age band. 25.2% of staff were aged '56 and above', which represents a 0.8% increase in staff aged '56 and above' compared to 2021.

Marital Status

The University's EO data were reviewed. In February 2026, 55.1% of staff were 'Married or in a Civil Partnership', a decrease of 4.8% compared to 2021.

Sexual Orientation

The University's EO data were reviewed. In 2026, 75.5% of staff were 'Heterosexual'; 5.0% were 'Lesbian, Gay and Bisexual (LGB)' and 19.5% were 'Not Known'. This indicates a 2.3% increase in LGB staff compared with 2021.

Men and Women generally

The University's EO data were reviewed. In 2026, 58.0% of staff were 'Female'. This indicates a 2% increase in female staff compared with 2021.

Disability

The University's EO data were reviewed. In 2026, 7.2% of staff declared a disability, an increase of 2.3% compared with 2021.

Our disability declaration rate is lower than expected, compared with the local population. The NI Census (2021) found that 24% of the NI population stated that their day-to-day activities were limited because of a long-standing health problem or disability.

Dependants

The University's EO data were reviewed. In 2026, 43.4% of staff had dependants. This indicates an increase of 5% compared with 2021.

Needs, experience and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy or decision? (Please specify for each of the Section 75 categories below the needs, experiences and priorities)

Religious Belief
None identified.

Political Opinion
None identified.

Racial Group
None identified.

Age
None identified.

Marital Status
None identified.

Sexual Orientation
None identified.

Men and Women generally
None identified.

Disability
None identified.

Dependants
None identified.

Consultation

Consultation with relevant groups, organisations or individuals about the policy can provide useful information about issues or opportunities which are specifically related to them (that is evidence to inform the policy).

Please indicate whether you carried out or intend to carry out any consultation exercises prior to equality screening?

Yes

Consultation with the Trade Unions.

Part 2: Screening questions

Introduction

The answers to the following screening questions will assist the University in making a decision whether or not there is a need to carry out an equality impact assessment on the policy. The following information is provided to help you to identify and comment on the level of likely impact of the policy in question 1 to 4.

Select 'major' impact if:

a) The policy is significant in terms of its strategic importance;

b) Potential equality impacts are unknown, because, for example, there are 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.

Select 'minor' impact if:

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 opportunities 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;

e) Differential impact observed and opportunities exist to better promote equality of opportunity and/or good relations.

Select 'none' if:

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.

Taking into account the evidence presented in Part 1, please complete the screening questions (Question 1 to 4).

Screening questions

1. What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 categories?

   Details of the likely policy impacts on **Religious Belief**
   The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

   What is the level of impact?
   None

   Details of the likely policy impacts on **Political Opinion**
   The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

   What is the level of impact?
   None

   Details of the likely policy impacts on **Racial Group**
   The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

   What is the level of impact?
   None

   Details of the likely policy impacts on **Age**
   The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

   What is the level of impact?
   None

   Details of the likely policy impacts on **Marital Status**
   The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

   What is the level of impact?
   None

Details of the likely policy impacts on **Sexual Orientation**
The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

What is the level of impact?
None

Details of the likely policy impacts on **Men and Women generally**
The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

What is the level of impact?
None

Details of the likely policy impacts on **Disability**
The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

What is the level of impact?
None

Details of the likely policy impacts on **Dependants**
The policy is unlikely to impact on equality of opportunity for this category; it is purely technical in nature.

What is the level of impact?
None

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

Religious Belief
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Political Opinion
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Racial Group
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Age
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Marital Status
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Sexual Orientation
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Men and Women generally
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Disability
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

Dependants
No, the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity.

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3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?

Religious Belief
Details of the likely policy impacts on **Religious Belief**
The policy is unlikely to impact on good relations between people of different religious belief. The policy has no relevance to good relations.

Level of impact
None

Political Opinion
Details of the likely policy impacts on **Political Opinion**
The policy is unlikely to impact on good relations between people of different political opinion. The policy has no relevance to good relations.

Level of impact
None

Racial Group
Details of the likely policy impacts on **Racial Group**
The policy is unlikely to impact on good relations between people of different racial groups. The policy has no relevance to good relations.

Level of impact
None

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

Religious Belief
No, the policy bears no relation to good relations.

Political Opinion
No, the policy bears no relation to good relations.

Racial Group
No, the policy bears no relation to good relations.

Additional considerations

Multiple identity

5. Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, 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).

   No. The policy is technical in nature and has no relevance to equality of opportunity or good relations.

   Please specify the relevant Section 75 categories concerned below.
   Provide details of the policy impact and data which describes the policy impact.

   Not applicable

Disability Duties

6. Does the policy provide an opportunity to encourage disabled people to participate in University life?

   No, the policy is technical in nature.

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7. Does the policy provide an opportunity to promote positive attitudes towards disabled people?

   No, the policy is technical in nature.

Part 3: Screening decision

Based on the evidence considered and outlined in Part 1 and the responses to the screening questions (Part 2), please indicate the screening decision for this policy.

Note: The University should take particular care not to screen out policies that have a procurement aspect if there is potential to promote equality of opportunity through the procurement of services.

☐ **Screen in** the policy (that is, subject to an Equality Impact Assessment). The likely impact is **major** in respect of one, or more of the equality of opportunity or good relations categories.

☒ **Screen out** the policy without mitigation or an alternative policy proposed to be adopted (that is, **no** Equality Impact Assessment). The likely impact is **none** in respect of all of equality of opportunity or good relations categories.

☐ **Screen out** the policy and **mitigate the impacts on equality** by **amending or changing the policy**, or by **developing an alternative policy or action** (that is, **no** Equality Impact Assessment). The likely impact is **minor** in respect of one or more of the equality of opportunity or good relations categories.

If the decision is to subject the policy to an equality impact assessment (that is, 'screen in' the policy), please provide details of the reasons.

Not applicable.

If the decision is not to conduct an equality impact assessment (that is, 'screen out' the policy), please provide details for the reasons.

The likely impact is 'none' in respect of all of the equality of opportunity and/or good relations categories.

The policy sets out to ensure that the University is compliant with The Bribery Act 2010 and that University maintains the highest ethical standards and carries out all its activities fairly, honestly, openly and in compliance with all applicable laws.

In line with University policy the procedure will be reviewed 2 years after it has been implemented and if necessary amended.

If the decision is not to conduct an equality impact assessment (that is, 'screen out' the policy), and mitigate the impacts on equality of opportunity by amending or changing the policy, or by developing an alternative policy or action, please provide reasons to support your decision, together with the proposed changes, amendments or alternative policy.

Not applicable.

Timetabling and prioritising

If the policy had been **'screened in'** for an equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1 to 3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority rating for timetabling the equality impact assessment in terms of effect on equality of opportunity and good relations:

Not applicable.

Priority rating for timetabling the equality impact assessment in terms of social need

Not applicable.

Priority rating for timetabling the equality impact assessment in terms of effect on people's daily lives

Not applicable.

Priority rating for timetabling the equality impact assessment in terms of relevance to the University's functions

Not applicable.

Note: The Total Rating Score will be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the University in timetabling. Details of the University's Equality Impact Assessment Timetable will be included in its quarterly Screening Reports.

Is the policy affected by timetables established by other relevant public authorities?

No

Approval and authorisation



Screened by:
Position or Job Title: University Secretary
Date screened: 16 June 2026



Approved by:
Position or Job Title: Chief People Officer
Date approved: 03 November 2026

Review

This policy is due for review (in terms of its impact on equality of opportunity and good relations) by the policy owner on: 3 November 2028