Policy Title: Fraud Risk Management Policy

Decision: Screen Out without mitigation

Contact: Elaine Hartin, Chief Strategy and Finance Officer

Date of Completion: 10 July 2024

Part 1: Policy Scoping

Information about the policy

Name of the Policy
Fraud Risk Management Policy

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

What is it trying to achieve? (For example, intended aims and outcomes)
To raise awareness of the types of fraud that the University is exposed to and to provide guidance on what to do if fraud is suspected.

Are there any Section 75 categories which might be expected to benefit from the policy? If so, explain how below.

Note: The Section 75 categories are:
- religious belief
- political opinion
- racial group
- age
- marital status
- sexual orientation
- sex
- disability
- dependants

No, this policy is applicable to all staff and students to raise awareness of the types of fraud that the University is exposed to and to provide guidance on what to do if fraud is suspected.

Who initiated or wrote the policy?
The Director of Audit, Risk and Business Continuity initiated and wrote the policy.

Who owns and implements the policy?
The Chief Strategy and Finance Officer owns and implements the policy.

Implementation factors

Are there any factors which could contribute to or weaken the intended aim or outcome of the policy?
No.

Main stakeholders affected

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

- Staff
- Students
- Prospective students
- Council
- University Partners
- Suppliers

Other policies with a bearing on this policy

What are they and who owns them?

Policy: Anti-Bribery Guidance
Policy owner: University Secretary

Policy: Whistleblowing (Public Interest Disclosure) Policy
Policy owner: University Secretary

Policy: Student Conduct Ordinance
Policy owner: University Secretary

Policy: Disciplinary Procedures (Staff)
Policy owner: Chief People Officer

Policy: Bullying and Harassment (Dignity at Work and Study)
Policy owner: Chief People Officer

Available evidence

What evidence or information (both qualitative and quantitative) have you gathered to inform this policy? Please specify details for each of the Section 75 categories below.

Religious Belief

The University's EO data was reviewed. On 6 February 2023, our staff profile was 51.4% Catholic and 48.6% Protestant. Compared with 6 February 2018, this indicates a 4.1% increase in Catholic staff.

In the Academic Year (AY) 2022 to 2023, 60.2% of our students identified as Christian and 11.0% identified as having 'No religion'. Compared with AY2017 to 2018, 76.1% identified as Christian and 13.5% identified as having 'No religion'.

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 was reviewed. On 6 February 2023, our staff profile was 93.5% White, 6.5% Black and Minority Ethnic (BME). This indicates a 1.8% increase in BME staff compared with 2018.

In AY 2022 to 2023, 11.2% of students identified as BME. This indicates a 6.7% increase in BME students compared with AY2017 to 2018.

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

Age

The University's EO data was reviewed. On 6 February 2023, almost one third (32.1%) of our staff were in the '46-55' age band. 25.4% of staff were in the '36-45' age band and 26.7% of staff were aged '56 and above', which represents a 4.4% increase in '56 and above' compared to 2018 (22.3%).

In AY 2022 to 2023, the majority of students (65.7%) were aged 21 and under 40. This indicates a 1.4% increase in students within this age band compared with AY 2017 to 2018.

Marital Status

The University's EO data was reviewed. In February 2023, 57.1% of staff were 'Married or in a Civil Partnership', a decrease of 6.7% compared to 2018 (63.8%).

In AY 2022 to 2023, 63.2% of students were 'Single', 15.1% decrease compared with AY 2017 to 2018 (78.3%).

Sexual Orientation

The University's EO data was reviewed. In 2023, 72.2% of staff were 'Heterosexual'; 3.6% were 'LGBT+' and 24.2% were 'Not Known'.

Although we collect student data on sexual orientation, this is not considered to be reliable.

Men and Women generally

The University's EO data was reviewed. In 2023, 57.9% of staff were 'Female'. This indicates a 2.6% increase in female staff compared with 2018.

In AY 2022 to 2023, 57.2% of students were 'Female', a 1% increase compared with AY 2017 to 2018.

Disability

The University's EO data was reviewed. In 2023, 5.6% of staff declared a disability, an increase of 0.5% compared with 2018.

In AY 2022 to 2023, 15.5% of students declared a disability, an increase of 5.1% compared with AY 2017 to 2018.

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 health problem or disability.

Dependants

The University's EO data was reviewed. In 2023, 44.1% of staff had dependants. This indicates a decrease of 4.3% compared with 2017.

In AY 2021 to 2022, 13.3% of students declared they had dependants, a decrease of 4.4% compared to AY 2017 to 2018.

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?

The following groups have been (or will be) consulted during the development of this policy:
- Senior Leadership Team, 14 May 2024
- Risk Management Committee, 14 May 2024
- JUCNC and HSW Committee Policy Working Group, 24 July 2024
- Audit and Risk Committee, 23 September 2024

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).

EQUALITY SCREENING PRO - FORMA

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. The policy is 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. The policy is technical in nature.

   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. The policy is technical in nature.

   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. The policy is technical in nature.

   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. The policy is technical in nature.

   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. The policy is technical in nature.

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. The policy is technical in nature.

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. The policy is technical in nature.

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. The policy is technical in nature.

Level of impact
None

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

Religious Belief
No, the policy has no relevance to equality of opportunity as it is technical in nature.

Political Opinion

No, the policy has no relevance to equality of opportunity as it is technical in nature.

Racial Group

No, the policy has no relevance to equality of opportunity as it is technical in nature.

Age

No, the policy has no relevance to equality of opportunity as it is technical in nature.

Marital Status

No, the policy has no relevance to equality of opportunity as it is technical in nature.

Sexual Orientation

No, the policy has no relevance to equality of opportunity as it is technical in nature.

Men and Women generally

No, the policy has no relevance to equality of opportunity as it is technical in nature.

Disability

No, the policy has no relevance to equality of opportunity as it is technical in nature.

Dependants

No, the policy has no relevance to equality of opportunity as it is technical in nature.

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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 bears no relation 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 religious belief. The policy bears no relation 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 religious belief. The policy bears no relation to good relations.

Level of impact
None

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 has no relevance to good relations

Political Opinion
No, the policy has no relevance to good relations

Racial Group

No, the policy has no relevance 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. The policy aims to raise awareness of the types of fraud that the University is exposed to and to provide guidance on what to do if fraud is suspected

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

No, the policy is technical in nature. The policy aims to raise awareness of the types of fraud that the University is exposed to and to provide guidance on what to do if fraud is suspected

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 the equality of opportunity and/or good relations categories.

The policy aims to raise awareness of the types of fraud that the University is exposed to and to provide guidance on what to do if fraud is suspected.

In line with University policy, the policy will be reviewed two 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.

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

No

Approval and authorisation

[signature]

Screened by: Elaine Hartin
Position or Job Title: Chief Strategy and Finance Officer
Date screened: 9 July 2024

[signature]

Approved by: Damian McAllister
Position or Job Title: Chief People Officer
Date approved: 10 July 2024

Review

This policy is due for review (in terms of its impact on equality of opportunity and good relations) by the policy owner on: 10 July 2026