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| 1. **Equality Impact Analysis**

 |
| **Policy / Project / Function:**  | Anti-Fraud, Bribery & Corruption Policy |
| **Date of Analysis:** | 23/09/15 |
| **This Equality Impact Analysis was completed by:** **(Name and Department**)  | Nikki Cooper, Local Counter Fraud Specialist |
| **What are the aims and intended effects of this policy, project or** **function?** | To provide guidance to staff on what fraud is, what everyone’s responsibility is to prevent fraud, bribery and corruption and how to report suspicions of fraud, bribery or corruption. |
| **Please list any other policies that are related to or referred to as part of this analysis**  | NHS NL CCG ConstitutionConflicts of Interest PolicyBusiness Conduct PolicyWhistleblowing PolicyVarious national standards and codes of conduct |
| **Who does the policy, project or function affect?**Please Tick ✔ | Employees [x]  Service Users [x] Members of the Public [x]  Other (List Below) [x] CCG MembersGoverning BodyCouncil of MembersCommittee and sub-committee MembersIndividuals contracted to work on behalf of or provide services or facilities to the Group |

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| 1. **Equality Impact Analysis: Screening**

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|  | Could this policy have a positive impact on… | Could this policy have a negative impact on… | Is there any evidence which already exists from previous (e.g. from previous engagement) to evidence this impact |
| Yes | No | Yes | No |  |
| **Race** | [ ]  | √ | [ ]  | √ |  |
| **Age** | [ ]  | √ | [ ]  | √ |  |
| **Sexual Orientation** | [ ]  | √ | [ ]  | √ |  |
| **Disabled People** | [ ]  | √ | [ ]  | √ |  |
| **Gender** | [ ]  | √ | [ ]  | √ |  |
| **Transgender People** | [ ]  | √ | [ ]  | √ |  |
| **Pregnancy and Maternity** | [ ]  | √ | [ ]  | √ |  |
| **Marital Status** | [ ]  | √ | [ ]  | √ |  |
| **Religion and Belief** | [ ]  | √ | [ ]  | √ |  |
| **Reasoning** | This policy will have neither a positive nor negative impact on the protected characteristics as it relates to responsibilities preventing fraud, bribery and corruption and how to report suspicions which are applicable to everyone as outlined within the scope of the policy, regardless of status. |
| **If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7** |

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| **7 Equality Impact Analysis Findings** |
| **Analysis Rating:** | * Red
 | * Red/Amber
 | * Amber
 | √Green |
|  | Actions | Wording for Policy / Project / Function |
| **Red****Stop and remove the policy** | **Red:** As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share *Protected Characteristics.* It is recommended that the use of the policy be suspended until further work or analysis is performed.  | **Remove the policy**Complete the action plan above to identify the areas of discrimination and the work or actions which needs to be carried out to minimise the risk of discrimination. | No wording needed as policy is being removed |
| **Red Amber****Continue the policy** | As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share *Protected Characteristics.* However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken. | **The policy can be published with the EIA**List the justification of the discrimination and source the evidence (i.e. clinical need as advised by NICE).Consider if there are any potential actions which would reduce the risk of discrimination.Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date. | As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share *Protected Characteristics.* However, a genuine determining reason exists which justifies the use of this policy and further professional advice. |
| **Amber****Adjust the Policy** | As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the *Action Planning s*ection of this document. | **The policy can be published with the EIA**The policy can still be published but the Action Plan must be monitored to ensure that work is being carried out to remove or reduce the discrimination.Any changes identified and made to the service/policy/ strategy etc. should be included in the policy.Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date. | As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the *Action Planning s*ection of this document. |
| **Green****No major change** | As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share *Protected Characteristics* and no further actions are recommended at this stage. | **The policy can be published with the EIA**Another EIA must be completed if the policy is changed, reviewed or if any discrimination is identified at a later date | As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share *Protected Characteristics* and no further actions are recommended at this stage. |

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| **Brief Summary/Further comments** | Not applicable |
| **Approved By** |
| Job Title: | Name: | Date: |
| Chief Finance Officer |  |   |