

Woven Housing Association

SECTION 75 EQUALITY SCREENING REPORT

Fraud Policy

Public authority	Woven Housing Association Ltd
Policy area	Governance / fraud prevention
Screening date	21/07/2025

Screening conclusion

SCREENED OUT WITH MITIGATION AND MONITORING

1. Policy profile

Screening question	Evidence-based assessment
What is the policy/procedure intended to achieve?	To prevent, detect, report, investigate and respond to fraud while protecting Woven's resources, reputation and public trust.
Who is affected?	Staff, Board and Committee members, contractors, consultants, suppliers, tenants and other stakeholders.
Who implements it?	Board, senior management, managers, employees, investigators and oversight committees.
Geographical scope	Woven operations and services in Northern Ireland.
Relationship to other arrangements	Fraud Procedure, Raising Concerns/Whistleblowing arrangements, disciplinary processes, data protection, AML, procurement and tenancy fraud controls.

2. Policy aims and equality relevance

Fraud controls are neutral in purpose, but allegations, investigations and sanctions can cause serious adverse effects if affected by bias, inaccessible reporting routes, poor evidence or inconsistent treatment.

3. Assessment of impacts on Section 75 groups

Section 75 category	Assessment of likely impact	Level
Religious belief	No adverse criterion is present, but decision-makers must avoid assumptions or bias.	Minor

Section 75 category	Assessment of likely impact	Level
Political opinion	No adverse criterion is present, but politically neutral, evidence-based decisions are required.	Minor
Racial group	Language, cultural or immigration-related misunderstandings must not be treated as evidence of fraud. Interpretation and accessible reporting routes may be needed.	Minor
Age	Digital-only reporting or complex communications may disadvantage some individuals.	Minor
Marital status	No differential impact identified.	None
Sexual orientation	No differential impact identified. Confidentiality and respectful treatment remain relevant.	None
Men and women generally	Monitor for bias or unequal patterns in allegations, referrals and outcomes.	Minor
Disability	Disabled people may require adjustments to report concerns, participate in interviews or understand correspondence.	Minor
Dependants	Timing and attendance requirements may affect people with caring responsibilities. Offer reasonable flexibility where practicable.	Minor

4. Multiple identity and intersectional considerations

Risk may be heightened where language, disability, age, poverty or unfamiliarity with processes overlap. Investigations must distinguish evidence from stereotype or misunderstanding.

5. Good relations

Consistent, evidence-based fraud controls support trust. Poorly handled allegations could stigmatise individuals or communities, so communications must avoid generalisation.

6. Opportunities to better promote equality of opportunity

- Provide more than one confidential reporting route and make routes accessible.
- Train investigators on unconscious bias, reasonable adjustments, confidentiality and evidence-based decision-making.
- Separate allegations from findings in records and reporting.
- Use anonymised trend monitoring to identify unexplained disparities.

7. Mitigation and safeguards

Potential issue	Mitigation / safeguard	Responsibility / evidence
Bias or stereotyping	Base decisions on verified evidence, document reasons and provide independent oversight.	Investigator / SMT
Inaccessible reporting or investigation process	Offer adjustments, interpretation and alternative communication methods.	Policy owner / investigator
Confidentiality and data protection risk	Apply need-to-know access, secure records and retention controls.	Investigation lead / DPO advice
Retaliation or fear of reporting	Use confidential channels and clearly communicate protections.	Senior management

8. Screening decision

Decision: Screened out without an Equality Impact Assessment (EQIA), subject to the mitigation and monitoring actions in this report.

The policy serves a legitimate governance aim and applies across the organisation. No provision directly disadvantages a Section 75 group. Minor risks arise from bias, accessibility, confidentiality and inconsistent investigation practice; these require explicit safeguards and monitoring but do not currently justify an EQIA.

Screening question	Evidence-based assessment
Major impact?	No evidence of a major adverse impact has been identified.
Minor impact?	Potential minor or differential impacts are capable of being addressed through reasonable adjustments, accessible communication, consistent decision-making and monitoring.
No impact?	For categories not specifically engaged by the subject matter, the provisions are neutral and apply consistently.
EQIA required?	No, on the evidence currently available. Re-screen if monitoring identifies an unmitigated adverse impact or if the policy changes materially.

9. Monitoring and review

- Review anonymised data on allegations, investigations and outcomes for unexplained disparities.
- Monitor complaints, appeals, grievances and concerns about investigation fairness.
- Review completion and effectiveness of fraud and investigator training.

The policy owner should retain evidence of monitoring, complaints, consultation and mitigations. Any material amendment should trigger a fresh screening review rather than relying solely on this assessment.

10. Consultation and publication

Consult relevant staff, Board oversight, HR, Finance, Housing, data protection and, where tenant reporting is expected, tenant representatives on accessible reporting routes and safeguards.

11. Sign-off

Screening question	Evidence-based assessment
Policy owner / lead	Executive Director of Finance, Digital Services and Procurement
Screening completed by	Corporate Assurance Manager
Screening date	21/07/2025
Approval / quality assurance	Board
Next review	Alongside the policy review, or sooner where evidence, complaints, consultation or law indicates a changed impact.

Overall conclusion: The policy can proceed without a full EQIA, provided the identified safeguards are implemented and equality impacts continue to be monitored.