

SECTION 75 EQUALITY SCREENING REPORT

Fraud Procedure

Public authority	Woven Housing Association Ltd
Policy area	Governance / fraud investigation
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 set out operational steps for preventing, reporting, assessing, investigating and responding to suspected fraud.
Who is affected?	Employees, Board members, contractors, suppliers, tenants, reporters, witnesses and people subject to allegations.
Who implements it?	Directors, managers, Fraud Response Team, investigators, HR, internal audit, legal advisers and oversight bodies.
Geographical scope	Woven operations and services in Northern Ireland.
Relationship to other arrangements	Fraud Policy, Raising Concerns/Whistleblowing, disciplinary arrangements, tenancy fraud procedures, data protection and fraud register.

2. Policy aims and equality relevance

The procedure directly affects reporters, witnesses and persons under investigation. Fair process, accessible communication, confidentiality, bias controls and reasonable adjustments are therefore central equality considerations.

3. Assessment of impacts on Section 75 groups

Section 75 category	Assessment of likely impact	Level
Religious belief	No differential treatment is specified. Apply consistently and avoid scheduling or communication practices that create avoidable barriers.	None
Political opinion	No political criterion or differential treatment is specified. Decisions should remain objective and evidence-based.	None
Racial group	Interpretation may be required; cultural or language differences must not be treated as suspicious without evidence.	Minor
Age	Offer non-digital or supported reporting routes where necessary.	Minor
Marital status	No differential impact identified.	None
Sexual orientation	Strict confidentiality is important where evidence may reveal private information unrelated to the allegation.	Minor
Men and women generally	Monitor referral and outcome patterns and avoid gendered assumptions.	Minor
Disability	Interviews, forms, venues and communications must be adjusted where reasonable.	Minor
Dependants	Interview and meeting scheduling may require reasonable flexibility.	Minor

4. Multiple identity and intersectional considerations

Individuals may face compounded barriers when disability, language, caring duties or fear of reprisal overlap. A single standard process should allow proportionate adjustments without reducing procedural fairness.

5. Good relations

Transparent, impartial investigations can maintain trust. Communications should avoid associating fraud risks with any racial, religious or political community.

6. Opportunities to better promote equality of opportunity

- Add an explicit reasonable-adjustment and interpretation step at intake and investigation planning.
- Use conflict-of-interest declarations for investigators.
- Provide clear written information about process, confidentiality, support and expected timescales.
- Quality-assure anonymised investigation outcomes for consistency.

7. Mitigation and safeguards

Potential issue	Mitigation / safeguard	Responsibility / evidence
Inaccessible forms/interviews	Offer assistance, alternative formats, interpreters and accessible venues or remote options.	Investigation lead
Investigator bias or conflict	Document appointment rationale, conflicts and independent review.	FLO / CEO / Ex.Director
Disclosure of sensitive personal data	Limit collection and access to what is necessary; use secure storage and defined retention.	Investigation lead / DPO
Rigid timescales	Treat stated timescales as aims subject to fairness, complexity and adjustments; communicate changes.	Investigation lead

8. Screening decision

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

A structured procedure can promote fairness, but its operation carries minor equality risks. These are manageable through explicit adjustments, independent oversight, confidentiality, evidence standards and monitoring. No major adverse impact requiring an EQIA is identified.

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,

Screening question	Evidence-based assessment
	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

- Audit a sample of cases for timeliness, adjustments, evidence standards and consistent outcomes.
- Review anonymised data on reporters, subjects and outcomes where lawful and proportionate.
- Record complaints or concerns about accessibility, bias or retaliation and act on lessons learned.

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 HR, Finance, Housing, internal audit, data protection, staff representatives and tenant representatives on reporting routes, forms, accessibility and procedural safeguards.

The completed screening report should be approved through Woven's governance arrangements, entered on the screening register and published in accordance with Woven's Equality Scheme. The report should be available in alternative formats on request.

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	ELT

Screening question	Evidence-based assessment
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.