

## ULSTER SUPPORTED EMPLOYMENT LIMITED

### SECTION 75 EQUALITY OF OPPORTUNITY SCREENING

<b>Policy Title (in full)</b>	Bribery Act Policy
<b>Policy Aim</b>	The key objectives of this policy are to provide the framework for achieving: <ul style="list-style-type: none"><li>• Increased awareness about the risk of bribery within Usel and its unacceptability</li><li>• A climate of openness and a culture and environment where staff feel able to raise concerns sensibly and responsibly</li><li>• Communicating Usel's responsibility in terms of deterrence, prevention, detection and investigation of bribery and corruption</li></ul>
<b>Decision (delete as appropriate)</b>	Policy screened out <b>without</b> mitigation
<b>Business Area</b>	<b>Corporate Services</b>
<b>Contact</b>	<b>Sarah-Jane Mowbray</b>
<b>Date of form completion</b>	<b>21/08/17</b>

#### For HR Department completion:

<b>Date received</b>	<b>24/08/17</b>
<b>Amendments requested?</b>	No
<b>Date returned to Business Area</b>	<b>24/08/17</b>
<b>Date final version received</b>	<b>24/08/17</b>
<b>Date place on S75 Screening webpage</b>	<b>01/09/17</b>

## Information about the policy

Name of the policy

Bribery Act Policy

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Is this an existing, revised or a new policy?

Revised

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What is it trying to achieve? (intended aims/outcomes)

The key objectives of this policy are to provide the framework for achieving:

- Increased awareness about the risk of bribery within Usel and its unacceptability
  - A climate of openness and a culture and environment where staff feel able to raise concerns sensibly and responsibly
  - Communicating Usel's responsibility in terms of deterrence, prevention, detection and investigation of bribery and corruption
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Are there any Section 75 categories which might be expected to benefit from the intended policy?

If so, explain how.

No

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Who initiated or wrote the policy?

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HR Manager

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Who owns and who implements the policy? \_\_\_\_\_

Head of Corporate Services

## Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

If yes, are they

financial

legislative

other, please specify \_\_\_\_\_

## Main stakeholders affected

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

staff

service users

other public sector organisations

voluntary/community/trade unions

other, please specify \_\_\_\_\_

## Other policies with a bearing on this policy

- what are they?

Gifts and Hospitality, Whistleblowing, Disciplinary,

- who owns them?

Head of Corporate Services

## Available evidence

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

<b>Section 75 category</b>	<b>Details of evidence/information</b>
Religious belief	Guidance was taken from existing Public Authority Policies and Procurement guidance
Political opinion	<b>As above</b>
Racial group	<b>As above</b>
Age	<b>As above</b>
Marital status	<b>As above</b>
Sexual orientation	<b>As above</b>
Men and women generally	<b>As above</b>
Disability	<b>As above</b>
Dependants	<b>As above</b>

## Needs, experiences 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/decision? Specify details for each of the Section 75 categories

<b>Section 75 category</b>	<b>Details of needs/experiences/priorities</b>
Religious belief	The policy will not adversely affect any of the groups covered by S75
Political opinion	<b>As above</b>
Racial group	<b>As above</b>
Age	<b>As above</b>
Marital status	<b>As above</b>
Sexual orientation	<b>As above</b>
Men and women generally	<b>As above</b>
Disability	<b>As above</b>
Dependants	<b>As above</b>

## Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? minor/major/none		
Section 75 category	Details of policy impact	Level of impact? minor/major/none
Religious belief	The policy has no impact on religious belief	None
Political opinion	The policy has no impact on political opinion	None
Racial group	The policy has no impact on racial group	None
Age	The policy has no impact on age	None
Marital status	The policy has no impact on Marital Status	None
Sexual orientation	The policy has no impact on sexual orientation	None
Men and women generally	The policy has no impact on men and women generally	None
Disability	The policy has no impact on disability	None

Dependants	The policy has no impact on those with dependants	None
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**2** Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?

Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Religious belief		This policy is designed to prevent bribery that could impact the reputational risk of Uesl and the department
Political opinion		As above
Racial group		As above
Age		As above
Marital status		As above
Sexual orientation		As above
Men and women generally		As above
Disability		As above

Dependants		As above
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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? minor/major/none**

Good relations category	Details of policy impact	Level of impact minor/major/none
Religious belief	No impact on religious belief	None
Political opinion	No impact on political opinion	None
Racial group	No impact on racial group	None

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

Good relations category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Religious belief		This policy is designed to prevent bribery within Usel regardless of any Section 75 category persons fall into



Political opinion		As above
Racial group		As above

**Additional considerations**

**Multiple identity**

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

*(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).*

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

Not affected by multiple identity-processes will be applied to all groups

**Part 3. Screening decision**

If the decision is not to conduct an equality impact assessment, please provide details of the reasons.

Based on the answers above we recommend the policy is screened out. The policy promotes legal and correct working, rather than adversely impact upon any of the groups covered by S75

## Part 5 - Approval and authorisation

<b>Screened by:</b>	<b>Position/Job Title</b>	<b>Date</b>
Patrice Devine	Business Improvement Officer	24/08/17
<b>Approved by:</b>		
<b>Sarah-Jane Mowbray</b>	Head of Corporate Services	24/08/17