

Cunninghame Housing Association Ltd

Equality and Human Rights Impact Assessment (EIA)

Assessment Details

Title of policy / practice	Fraud, Bribery and Corruption Policy
Assessment carried out by <i>(name and post)</i>	Elaine Nimmo PA to CEO
What is the purpose of the proposed policy / practice or changes to be made to the policy / practice?	The policy aims to prevent fraud, corruption and bribery to protect the assets and reputation of Cunninghame Housing Association.
What involvement and consultation has been done in relation to this policy / practice? <i>(e.g. with relevant groups and stakeholders)</i>	The previous Anti Bribery and Fraud and Corruption Policies have been combined with minimal changes to the principle of the policy. No consultation has been carried out on this version; however the policy was considered by the Board of Management for approval.
Who is affected by the policy / practice? <i>(indicate stakeholder / service user groups and any known equality groups)</i>	Staff and Board Members of Cunninghame Housing Association and its subsidiary companies as well as third parties, which includes contractors, consultants, customers and partner organisations.

Public Sector Equality Duty – ‘Three Key Needs’

Which aspects of the policy / practice eliminate unlawful discrimination, harassment and victimisation?	There are no issues in the policy that will impact on the protected characteristics.
Which aspects of the policy / practice advance equality of opportunity between people which share a relevant protected characteristic and those who do not?	
Which aspects of the policy / practice foster good relations between people who have a protected characteristic and those who do not?	

Impact of the Policy

Protected Characteristic Group	Is there the potential for a positive or negative impact?	Explain the potential impact and give examples of any evidence / data used (e.g. SIMD)	Action taken to address any negative impact (e.g. adjustment to the policy / practice)
Age	No		
Disability	No		

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Gender reassignment	No		
Marriage and civil partnership	No		
Pregnancy and maternity	No		
Race	No		
Religion or Belief	No		
Sex	No		
Sexual orientation	No		
Other	No		

Evaluation

Is it possible the proposed policy / practice could discriminate or unfairly disadvantage people?	The policy has been developed specifically with people with protected characteristics in mind, and aims to ensure that any unwanted conduct related to a relevant protected characteristic will not be tolerated, and dealt with as a serious matter in accordance with the relevant policy.
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Recommended Course of Action	Tick appropriate box	Include any justification / explanation required
Outcome 1 Proceed – no potential for unlawful discrimination, and no adverse impact or breach of human rights articles has been identified.	✓	N/A
Outcome 2 Proceed with adjustments to address discrimination, remove barriers to the advancement of equality of opportunity and fostering good relations, address breaches of human rights.		
Outcome 3 Continue despite having identified some potential for adverse impact or missed opportunity to advance equality and human rights (justification to be clearly set out).		
Outcome 4 Stop and rethink as actual or potential unlawful discrimination or breach of human rights articles has been identified.		

Completion date	February 2025
Authorisation date	20 March 2025
Authorised by	Jacqueline Cameron
Review date	February 2028
Will this EIA be published? (EIAs should be published)	Yes

Change Log

Name	Date	Changes