Fraud, Corruption & Bribery Response Policy

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1. Introduction

1.1 USP College is a General Further Education College established under the Further and Higher Education Act 1992 for the purposes of providing Post 16 education. It is primarily funded by public funds and is a high-profile institution in the local community. As such it is essential for the protection and benefit of both individual members of staff and the institution that all financial and other business dealings within the college are beyond reproach.

1.2 USP College has a zero tolerance for fraud, corruption and bribery. This policy is designed to establish guidelines and procedures to safeguard the college's resources, reputation and relationships.

1.3 It is the responsibility of the Corporation, as set out in accountability agreements and contracts with the Department for Education (DfE), to establish and maintain an adequate system of internal control, to ensure compliance, and to prevent and detect irregularities and suspected fraud (including theft, bribery and corruption). The college has reviewed its arrangements for preventing, detecting and dealing with fraud through the use of the anti-fraud check list for post-16 providers (see Appendix B).

1.4 The college has a continuing commitment to a culture of openness, integrity and accountability in all its financial and business dealings. The college expects corporation members and staff at all levels to lead by example ensuring adherence to legal requirements, rules, procedures and practices. The college also expects that individuals and organisations (e.g. suppliers, contractors and service providers) with which it comes into contact will act with integrity and without thought of actions involving fraud and corruption.

1.5 The college has a duty to protect the public and commercial funds received under its control against fraud, corruption and bribery both from within the college and from external sources.

1.6 Where fraud is identified, the chair of the Risk and Audit Committee, external auditors and internal auditors (if applicable) must be informed as soon as practically possible. The DfE must also be informed when the amounts are significant, that is exceeding £5,000 in value. Significant fraud should be reported to Action Fraud (National Fraud & Cyber Crime Reporting Centre) to help identify systematic risks potentially affecting whole sectors (e.g. Cybercrime).

1.7 Fraud's inherent nature means that any fraudulent transaction must be irregular and improper. The accounting officer must include any significant fraud in their statement of regularity, propriety and compliance.

1.8 Colleges must also be aware of the risk of cybercrime, put in place proportionate controls and take appropriate action where a cyber security incident has occurred. Colleges must not pay any cyber ransom demands. The DfE supports the National Crime Agency's recommendation not to encourage, endorse, or condone the payment of ransom demands. Payment of ransoms has no guarantee of restoring services and may lead to repeat incidents.

1.9 This policy should not be confused with the Staff Grievance Policy. It is not for anonymous complaints and may not be used as an alternative mechanism for employees to raise private grievances.

The following college policies and procedures should be referred to in conjunction with this policy:

a. Gifts & Hospitality Policy
b. Whistleblowing
c. Financial Regulations

2. Economic Crime & Corporate Transparency Act 2023

2.1 Under the Economic Crime and Corporate Transparency Act 2023 (ECCTA), a new corporate offence for "failure to prevent fraud" came into force on 1 September 2025. This law holds large UK organisations, including further and higher education institutions, criminally liable if an "associated person" commits fraud for the institution's benefit. The offence applies specifically to "large organisations." A further education (FE) college is in scope if it meets at least two of the following three criteria in the preceding financial year:

a. Employees: More than 250 employees
b. Turnover: More than £36 million
c. Assets: More than £18 million in total asset

2.2 Even if a college is not "large", the Home Office and the DfE recommend adopting these prevention measures as good practice.

2.3 Key legal elements and reasonable procedures defence for colleges is provided under Appendix C.

3. The Definition of Fraud, Corruption and Bribery

3.1 Fraud can be defined as:

The legal definition of fraud as defined in the Fraud Act 2006 is: "The making of a false representation or failing to disclose relevant information, or the abuse of position, in order to make a financial gain or misappropriate assets".

3.2 According to The Fraud Act 2006, offences of fraud are broken down into three sections:

a. Fraud by false representation
b. Fraud by failing to disclose information
c. Fraud by abuse of position

3.3 Corruption is defined as:

The willingness to act dishonestly and illegally, or to allow oneself to be induced or influenced in return for financial or other gain.

3.4 Bribery can be defined as:

Giving or receiving a financial or other advantage in connection with the improper performance of a position of trust or function that is expected to be performed impartially or in good faith.

3.5 Cybercrime can be defined as:

Cybercrime is the use of a computer or a networked device to commit or facilitate illegal activities. Cybercrime can target or exploit computers, networks, or communication devices. Cybercrime is carried out by individuals or organisations who want to make money, harm others, or advance their agendas. Cybercrime can involve fraud, trafficking, identity theft, privacy violation, malware, phishing, and social engineering.

4. Irregularities

4.1 In carrying out its responsibilities, the college will seek to protect itself against fraud, corruption and bribery both from within the college and from outside. The college is committed to an effective Anti-Fraud and Corruption Strategy designed to:

a. encourage prevention
b. promote detection; and
c. identify a clear pathway for investigation

4.2 There are broadly four categories of irregularity as set out below:

a. **Theft** - Dishonesty appropriating property of another with the intention of permanently depriving them of it (Theft Act 1968).

b. **False Accounting** - Dishonesty destroying, defacing, concealing or falsifying any account, record or document required for any accounting purpose, with a view to personal gain or gain for another, or with intent to cause loss to another or furnishing information, which is or may be misleading, false or deceptive (Theft Act 1968).

c. **Bribery and Corruption** - Offering a bribe to any public officer to influence his behaviour and similarity accepting such a bribe (Prevention of Corruption Acts 1889-1916; Bribery Act 2010).

d. **Private Interests** - Failure by governors and staff to declare their private interests where they may be affected by matters under consideration.

4.3 The most common areas in which an irregularity is likely to occur are as follows:

a. **Income** - Where the receipt of income provides opportunity for fraud by basic cash retention, assisted by suppressing, falsifying or destroying cash receipt or invoice records or when no initial receipt records are created. Falsification of records supporting grant or other income claims.

b. **Payroll** - Where the payroll system provides opportunity for fraud by introducing non-existent employees, known as ghosts, unauthorised amendments to input data, or making excessive overtime or bonus claims.

c. **Expenditure** - Where false input of invoices or payments may be possible or payments may be diverted, permanently or temporarily. Contract fraud where accepting late tenders or specification variation may arise, or contract or tender records are falsified or manipulated. Acceptance or maintenance of contracts where an undeclared personal gain arises. Evading liability for payment and falsifying mileage claims.

d. **Stocks and Stores** - Where poorly maintained stock records provide opportunity for misappropriation of stores by theft, the acceptance of short or unsolicited deliveries, the ordering of items for personal use or uneconomical purchasing due to inducements by suppliers.

e. **Computer Misuse** - Where computer systems, software and/or hardware are misused in order to perpetrate fraud or to the potential detriment of the college (for example through use of unlicensed software or introduction of spyware).

f. **Assets** - Use of assets for personal gain or misappropriation of assets.

5. Reporting Fraud, Corruption and Bribery

5.1 The detection, prevention and reporting of fraud is the responsibility of all members of staff, management and the Governing Body. The Chief Finance Officer should be notified immediately whenever any matter arises which involves, or is thought to involve, irregularity, including fraud, corruption or any other impropriety. The Chief Finance Officer will then invoke the Fraud, Corruption and Bribery Response Plan (see Appendix A).

5.2 The Chief Finance Officer is responsible for reporting allegations of fraud and corruption to the Chief Executive Officer, the Executive Leadership Team and to the Clerk to the Corporation, who shall immediately inform the Chairman of the Risk & Audit Committee and the Chair of Corporation.

5.3 Individuals should be prepared to make a statement, in writing, disclosing any information available. If the allegation is made orally, then full notes will be taken to support the resulting investigation.

5.4 Prompt action is essential by all parties to minimise the potential impact of any suspected fraud and to arouse minimum suspicion by the alleged perpetrator(s). It is also very important to involve the police at an early stage where the investigation is likely to result in criminal prosecution.

5.5 Due to the complexity, almost all cases which could result in criminal proceedings should be investigated by the Police. The auditors' role will then be to support the investigation providing research and information on behalf of the college. This is still a very important role, and it is likely that auditors could be the main prosecution witnesses. Impeccable records and procedures are therefore essential.

5.6 Any such report will be made in consideration of the responsibility of the Audit Partner and the college to ensure that they could not subsequently be found to have defamed the character of individuals involved. The college and Audit Partner's defence in respect of such reports are:

a. **Justification** - in that the statement is true

b. **Fair Comment** - in that the statement is genuine

c. **Privilege** - in that it is the auditor's duty to report all findings

5.7 As part of a follow-up to an irregularity investigation, system's controls should be reviewed to prevent the opportunity for any future irregularity. Where appropriate and feasible, steps should be taken to recover any loss, whether through insurance cover (e.g., Fidelity guarantee), deductions from salary or other accrued benefits or other means.

5.8 The Chief Finance Officer and, where appropriate, the external or internal auditors must report to the funding body (through the local funding body's Chief Executive), without delay, serious weaknesses, significant frauds, major accounting and other control breakdowns of which they are aware. Significant fraud is usually where one or more of the following factors are involved:

a. the sums of money are in excess of £5,000

b. the particulars of the fraud are novel, unusual or complex

c. there is likely to be great public interest because of the nature of the fraud or the people involved

5.9 If the suspected fraud is thought to involve the Chief Finance Officer, the member of staff shall notify the Chief Executive Officer of their concerns regarding irregularities. If the suspicions relate to the Chief Executive Officer, the allegation will be reported to the Chairman of the Risk & Audit Committee via the Chief Finance Officer.

5.10 Chief Finance Officer should acknowledge the allegation in writing immediately. All correspondence with the discloser should be directed to the discloser's home address or delivered personally by hand. Such correspondence should <u>never</u> be by use of the college's internal mail system.

5.11 The Public Interest and Disclosure Act 1998 (PIDA) protects and encourages members of staff to report suspected wrongdoing at work. A worker can report things that are not right, are illegal or if anyone at work is neglecting their duties.

5.12 If staff feel unable to raise their concerns through any of the internal routes, then they may wish to raise them through Public Concern at Work (Tel: 020 3117 2520), a registered charity whose services are free and strictly confidential.

5.13 The college has a published a whistle-blowing policy and all staff should be familiar themselves of the contents of the document particularly if they have any concerns regarding any financial or other irregularity within the College.

5.14 The college also has a compliments and complaints policy which allows members of the public or external bodies to raise any issues of concern regarding the activities of the college.

5.15 The college welcomes external scrutiny as a demonstration of its commitment to the Anti-Fraud and Corruption Strategy, which includes the following:

a. The college's external auditors

b. The college's internal auditors

c. The Department for Education (DfE)

d. The National Audit Office
e. HM Revenue & Customs (HMRC)
f. The public.

6. Investigation

6.1 The Chief Finance Officer is responsible for following up any allegation of fraud, corruption and bribery, and will do so by:

a. Acknowledging the allegation in writing immediately
b. Making a record of all evidence received
c. Ensuring that the evidence is sound, adequately supported and secure
d. Identifying any immediate action required to prevent reoccurrence

6.2 Within 10 working days of the allegation the Chief Finance Officer will make one or more of the following recommendations:

a. The matter to be internally investigated by the college
b. The matter to be investigated by the internal or external auditors
c. The matter to be reported to the ESFA or other appropriate public body
d. The matter to be reported to the police
e. The route for the discloser to pursue the matter if it does not fall within this procedure
f. That no further action is taken by the college

6.3 Within s within the discretion of the Chief Finance Officer to inform the police if there are any grounds for suspecting criminal activity.

6.4 If the investigation reveals suspicion of misconduct or serious misconduct, normal

7. Role of the Auditor

7.1 The College will instruct the Internal or External Auditor to investigate any allegation as directed by the Chief Finance Officer.

7.2 After an initial investigation has been carried out the Auditor will submit a written report.

8. Role of the Risk & Audit Committee

8.1 Depending on the nature and anticipated extent of the allegations, the Risk & Audit Committee, which may commission a further investigation, from the internal or external auditors as seems appropriate, may require the Chief Executive Officer, Chief Finance Officer or Chairman of the Corporation to take action if necessary to suspend any member of staff involved, whilst the investigation is taking place.

9. Prevention

9.1 Staff

a. The college recognises that a key preventive measure in the fight against fraud, corruption and bribery is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of the propriety and integrity of potential staff. This should include temporary and contract staff as well as permanent staff. The safer recruitment and selection processes are outlined in the college's Safer Recruitment and Selection Policy.

b. The Director of Human Resources should ensure that procedures laid down by the college are followed and, in particular, Disclosure and Barring Service (DBS) checks and written references should be obtained regarding the employment dates, job title and reason for leaving. In some cases, professional and personal references are requested regarding any concerns or allegations related to the safety and welfare of young people or vulnerable adults before employment offers are confirmed.

c. Staff of the college are expected to follow any Code of Conduct related to their professional body and to abide by the 'official conduct' rules set out in the employee handbook. The disciplinary procedures applicable to all staff are contained in the college's Disciplinary Policy.

d. Within the Terms of Employment, staff are required to disclose outside interests which may impinge upon the College and in particular any pecuniary interests of other employment in which they are involved. Our conflict-of-interest clause states only the following "You will be required by the Corporation to promptly register any outside interests. You may not undertake any activities that may cause a conflict of interest or bring the college or any of its officers' name into disrepute."

e. These requirements and the disciplinary procedure are set out in the college's Financial Regulations, to which every member of staff has access.

9.2 Corporation Members

a. Corporation members are required to make an annual declaration of interests, and they are required to operate within the Boards code of conduct and the college financial regulations. All Governors receive training on a periodic basis on the roles and responsibilities of their position. The college has also published a Governors' reference pack, which contains details of roles and responsibilities.

b. These matters and other guidance are specifically brought to the attention of members at induction courses for new members.

9.3 Internal Control

a. The college recognises that a key preventative measure in reducing the opportunity for fraud and corruption is to ensure that an adequate system of internal control is in place.

b. The college has recorded the system of internal control within the college's Financial Regulations and these place a requirement on staff, when dealing with the college's affairs, to act in accordance with these regulations. Unauthorised deviation from these written regulations and procedures may be dealt with as a disciplinary matter.

c. The college is committed to developing systems and procedures, which incorporate efficient and effective internal controls. These include adequate separation (segregation) of duties to minimise the risk of error or impropriety. Departmental Heads are required to ensure that such controls, including those in a computerised environment, are properly maintained and documented.

d. The existence, appropriateness and effectiveness of these internal controls is independently monitored by Internal Audit and reviewed by the Risk & Audit Committee.

e. The college's financial regulations are reviewed on a regular basis and are approved by the Finance & Resources Committee.

Appendix A

Fraud, Corruption and Bribery Response Plan

Once notified, the Chief Finance Officer shall immediately invoke the fraud Corruption and Bribery Response Plan, which incorporates the following:

Process	Responsibility	Action to be taken
An irregularity has come to light	Informant	➢ Report the irregularity to the CEO and Chief Finance Officer immediately - 3 possible reporting sources of fraud occurrence **A)** Area/ Department **B)** Third Party **C)** Auditor ➢ Prompt discrete action is required in all cases ➢ Where irregularity involves the Chief Finance Officer, report to the Chief Executive Officer who will enact the role undertaken by the Chief Finance Officer regarding this policy ➢ Where irregularity involves the Chief Executive Officer, report to the Chairman of the Risk & Audit Committee via Chief Finance Officer

Source of Fraud - A

Process	Responsibility	Action to be taken
When an irregularity has been reported in a Curriculum or Business Support Area/Department	Chief Finance Officer	➢ Report the irregularity to the Chief Executive Officer ➢ Advise the Audit Partner or Manager ➢ Inform the Risk & Audit Committee Chairman ➢ Agree formal approach to any investigation, report and actions ➢ Determine whether to request police involvement ➢ Liaise with the Head of HR on the steps to be taken by way of disciplinary procedures
	Police involvement (if required)	➢ Police to be informed if a criminal offence is suspected of having been committed ➢ Auditor to support the investigation by providing research and information on behalf of the College ➢ Auditor to keep accurate records and procedures
	Audit interview – Internal / External Auditor	➢ Take statements from suspect(s) adhering strictly to the Code of Practice (section 66) Police and Criminal Evidence Act 1984 ➢ Keep accurate records and signed statements ➢ Report to the Risk & Audit Committee
	Review and Recovery - Auditor	➢ Assess systems and controls ➢ Attempt recovery of any losses

Source of Fraud - B

Process	Responsibility	Action to be taken
When allegations have been made by a third party	Chief Finance Officer	➢ Obtain formal statement from Informant, acknowledging anonymity if required ➢ Request the involvement of the Audit Partner or Manager in a written statement of the allegation ➢ Report the irregularity to the Chief Executive Officer ➢ Inform the Risk & Audit Committee Chairman
	Audit Partner / Manager	➢ Respond to the Informant but respect anonymity of Informant if requested ➢ Investigate allegation to an appropriate degree ➢ Inform the Chief Executive Officer and Risk & Audit Committee Chairman if necessary ➢ Take confidential advice from appropriate sources ➢ Retain all records which may be involved
	Chief Finance Officer, Audit Partner and Risk & Audit Committee Chairman	➢ Determine whether to request police involvement ➢ Determine the extent to which Audit and/or College staff should be involved in the investigation ➢ Determine the extent to which the governors, Risk & Audit Committee and the Principalship should be informed of the investigation by the Police or Auditors
	Police involvement (if required)	➢ Police to be informed if a criminal offence is suspected of having been committed ➢ Auditor to support the investigation by providing research and information on behalf of the College ➢ Auditor to keep accurate records and procedures
	Audit interview - Auditor	➢ Take statements from suspect (s) adhering strictly to the Code of Practice (section 66) Police and Criminal Evidence Act 1984 ➢ Keep accurate records and signed statements ➢ Report to the Risk & Audit Committee
	Review and Recovery - Internal Auditor	➢ Assess systems and controls ➢ Attempt recovery of any losses

Source of Fraud - C

Process	Responsibility	Action to be taken
If an auditor suspects an irregularity	Auditor	➢ Contact the Audit Partner or Manager ➢ In case of cash deficiency, carry out a comprehensive cash count of all monies at the College
	Audit partner / manager	➢ Safeguard all records ➢ Avoid alerting the suspect ➢ Inform the Chief Executive Officer and Chief Finance Officer unless suspected of being involved with the irregularity ➢ Inform the Risk & Audit Committee Chairman
	Chief Finance Officer, Internal Audit Partner and Audit Committee Chairman	➢ Determine whether to request police involvement ➢ Determine the extent to which Audit and/or College staff should be involved in the investigation ➢ Determine the extent to which the governors, Risk & Audit Committee and the Principalship should be informed of the investigation by the Police or Internal Audit

	Police involvement (if required)	➢ Police to be informed if a criminal offence is suspected of having been committed ➢ Auditor to support the investigation by providing research and information on behalf of the College ➢ Auditor to keep accurate records and procedures
	Audit interview - Internal Auditor	➢ Take statements from suspect (s) adhering strictly to the Code of Practice (section 66) Police and Criminal Evidence Act 1984 ➢ Keep accurate records and signed statements ➢ Report to the Audit Committee
	Review and Recovery - Internal Auditor	➢ Assess systems and controls ➢ Attempt recovery of any losses

Other information

Significant cases of fraud or irregularity	Auditor	➢ Must be reported to the funding body in accordance with their requirements as set out in the audit code of practice
Commissioned investigations	Risk & Audit Committee	➢ The Risk & Audit Committee shall commission such investigation as may be necessary of the suspected irregularity, by the internal / External auditors or others, as appropriate ➢ The Auditors, or others commissioned to carry out an investigation, shall prepare a report for the Risk & Audit Committee on the suspected irregularity.

Appendix B

The reportable matters of material significance

(Extract from Charity Commission Matters of Material Significance reportable to charity regulators Guidance April 2020)

(updated March 2026)

No.	Title	Each Matter is prefaced by the following statement - 'During the course of an audit/independent examination':
1	Dishonesty and Fraud	Matters suggesting dishonesty or fraud involving a significant loss of, or a material risk to, charitable funds or assets.
2	Internal Controls and Governance	Failure(s) of internal controls, including failure(s) in charity governance that resulted in, or could give rise to, a material loss or is appropriation of charitable funds, or which leads to significant charitable funds being put at major risk.
3	Money Laundering and Criminal Activity	Knowledge or suspicion that the charity or charitable funds including the charity's bank account(s) have been used for money laundering or such funds are the proceeds of serious organised crime or that the charity is a conduit for criminal activity.
4	Support of Terrorism	Matters leading to the knowledge or suspicion that the charity, its trustees, employees, or assets, have been involved in or used to support terrorism or proscribed organisations in the UK or outside of the UK, with the exception of matters related to a qualifying offence as defined by Section 3(7) of the Northern Ireland (Sentences) Act 1998.
5	Risk to charity's beneficiaries	Evidence suggesting that in the way the charity carries out its work relating to the care and welfare of beneficiaries, the charity's beneficiaries have been or were put at significant risk of abuse or mistreatment.
6	Breaches of law or the charity's trusts	Single or recurring breach(es) of either a legislative requirement or of the charity's trusts leading to material charitable funds being misapplied.
7	Breach of an order or direction made by a charity regulator	Evidence suggesting a deliberate or significant breach of an order or direction made by a charity regulator under statutory powers including suspending a charity trustee, prohibiting a particular transaction or activity, or granting consent on particular terms involving significant charitable assets or liabilities.
8	Modified audit opinion or qualified independent examiner's report	On making a modified audit opinion, emphasis of matter, material uncertainty related to going concern, or issuing of a qualified independent examiner's report identifying matters of concern to which attention is drawn, notification of the nature of the modification/qualification/emphasis of matter or concern with supporting reasons including notification of the action taken, if any, by the trustees subsequent to that audit opinion, emphasis of matter or material uncertainty identified /independent examiner's report.
9	Conflicts of interest and related party transactions	Evidence that significant conflicts of interest have not been managed appropriately by the trustees and/or related party transactions have not been fully disclosed in all the respects required by the applicable SORP, or applicable regulations.

Appendix C

Economic Crime & Corporate Transparency Act 2023

Under the **Economic Crime and Corporate Transparency Act 2023 (ECCTA)**, a new corporate offence for "failure to prevent fraud" came into force on **1 September 2025**. This law holds large UK organisations, including further and higher education institutions, criminally liable if an "associated person" commits fraud for the institution's benefit.

1. Key Legal Elements

- **Strict Liability**: A college can be guilty even if senior management was completely unaware of the fraud.
- **Associated Persons**: Liability is triggered by the actions of employees, agents, contractors, subsidiaries, or anyone performing services on the college's behalf.
- **Intent to Benefit**: The fraud must have been intended to benefit the college or its clients, rather than the college being a victim of the fraud itself.
- **Penalties**: Conviction can lead to **unlimited fines** and severe reputational damage.

2. The "Reasonable Procedures" Defence

Colleges have a statutory defence if they can prove they had "reasonable fraud prevention procedures" in place at the time of the offence. The UK Government Guidance outlines six core principles:

- **Top-level commitment**: Clear anti-fraud culture set by governors and senior leaders.
- **Risk assessment**: Regular, documented reviews of vulnerabilities (e.g., procurement, student funding, and payroll).
- **Proportionate procedures**: Prevention measures that match the college's specific size and risk profile.
- **Due diligence**: Thorough vetting of third-party agents, partners, and contractors.
- **Communication and training**: Regularly updated anti-fraud and whistleblowing policies shared through staff training.
- **Monitoring and review**: Continuous evaluation and improvement of existing controls.

3. Common Fraud Risks in Education

Potential base offences for FE colleges include false accounting, fraud by false representation, and cheating public revenue. Specific examples include:

- Falsifying accounts or student data to secure more government grant funding.
- Making false statements about course quality to boost student enrolment.
- Dishonest practices in subcontracting or procurement arrangements.

Equality and Diversity Statement & Impact Assessment

USP College is committed to equality of opportunity. The aim is to create an environment in which people treat each other with mutual respect, regardless of: age, disability, family responsibility, marital status, race, colour, ethnicity, nationality, religion or belief, gender, gender identity, transgender, sexual orientation, trade union activity or unrelated criminal convictions. This form should be used by managers and policy owners within their area of responsibility to carry out Equality and Diversity Impact Assessments (EDIAs) in relation to protected characteristics including, but not limited to: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion and belief, Sex, Sexual orientation. The word 'policy' is taken to include strategies, policies, procedures and guidance notes; both formal and informal, internal and external.

1. Name of Policy

Fraud, Corruption & Anti Bribery Response Policy

2. Which of the following groups could be affected by this policy?
(Tick all that apply)

Students	√
Staff	√
Wider Community	√

3. Complaints

Have complaints been received from anyone with one or more protected characteristic about the service provided? If yes then please give details.

NA

4. The Impact

Four possible impacts should be considered as part of the assessment:

a. **Positive Impact -** Where the policy might have a positive impact on a particular protected characteristic.
b. **None or Little Impact –** Where you think a policy does not disadvantage any of the protected characteristics
c. **Some Impact –** Where a policy might disadvantage any of the protected characteristics groups to some extent. This disadvantage may be also differential in the sense that where the negative impact on one particular group of individuals with protected characteristic is likely to be greater than on another.
d. **Substantial Impact –** Where you think that the policy could have a negative impact on any or all of the protected characteristics. This disadvantage may be also differential in the sense that the negative impact on one particular protected characteristic is likely to be greater than on another.

Thought-provoking questions, which might help come to a decision about the impact of a policy on individuals with protected characteristics:

e. Does policy outcomes and service take up differ between people with different protected characteristics?
f. What key information do we have? Does data or engagement with people with protected characteristics give insights into areas of disadvantage, which relate to the policy area?
g. If the policy is likely to have a negative impact on individuals, sharing particular characteristics what steps can be taken to mitigate these effects?
h. Will the policy deliver practical benefits for certain groups?
i. Does the policy miss opportunities to advance equality of opportunity and foster good understanding/ relationships between groups?
j. Do other policies need to change to make this policy more effective?

k. Is there any elements of the policy that could be unlawful under the Equality Act 2010?

Use the guidance provided above and complete the following table: **(Please Tick √)**

Gender/Age	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Gender		√		
Age		√		
Disability	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Visually Impaired		√		
Hearing impaired		√		
Physical Disability		√		
Specific Learning Difficulties		√		
Global Learning Difficulties		√		
Autistic Spectrum Disorder		√		
Any other disability – Various		√		
Other Factors	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Race		√		
Culture		√		
Religious Belief		√		
Sexual Orientation		√		
Gender Reassignment		√		
Marriage/Civil Partnership		√		
Pregnancy /Maternity /Paternity		√		

Please comment on any areas where some or substantial impact is indicated. Any resulting actions must be added to the below action plan.

5. Is there anything that cannot be changed?

What cannot be changed?	Can this be justified?	If so, how?
Not applicable		
E.g., Disabled people can be treated more favorably under the Disability Discrimination Act 2005. If a policy appears to treat disabled people more favorably than other equality groups, the disadvantage may be justifiable		

Please list the main actions that you plan to take as a result of this assessment in your area of responsibility. (Continue on separate sheets as necessary)

Action Plan: