



Glasgow Kelvin College

Equality Impact Assessment

Anti - Fraud and Anti – Corruption Policy

Next Review – November 2025

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**Title of Policy, Procedure or Practice:**

**Anti - Fraud and Anti- Corruption Policy**

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**Type of Policy, Procedure or Practice:**

New

Existing, Reviewed or Revised

**Team Leading Impact Assessment:**

**Corporate Governance**

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**Lead Person:**

**Annette McKenna**

**Date of Assessment: November 2024**

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**Aims and Outcomes**

**What are the intended aims / outcomes of the policy, procedure or practice? Who is the target audience and who is it intended to benefit?**

**The purpose of this policy is to establish a framework within the College that facilitates the prevention, detection, investigation and elimination of fraud. This policy applies to all staff, students, contractors and Board of Management members/trustees. Glasgow Kelvin College is committed to taking all practical steps:**

- to prevent being subjected to fraud whether perpetrated by staff, Board of Management members/trustees, students, contractors, suppliers, members of the public, or other public or private sector organisations;**
- to facilitate confidential and protected reporting of known or suspected fraud in association with the College’s Public Interest Disclosure (“Whistle-blowing”) policy and procedures;**
- to identify and detect any instances of fraud at the earliest opportunity;**
- to investigate any instances of fraud, with police involvement where appropriate;**
- to take appropriate action to deal with any instances of fraud and with any perpetrators after investigation.**

**Evidence and Information**

**What information has been used as the basis for this EIA?**

**This policy applies to all equally and without bias and due to the nature of this, it does not impact adversely on any individual with protected characteristics**

<b>Protected Characteristics</b>	<b>Potential Impact</b>
<b>Age</b>	Impact: Neutral  Rationale: The policy applies equally to all age groups. There is no differential impact based on age, as the guidelines and protections against fraud are inclusive for all age demographics.
<b>Disability</b>	Impact: Neutral to Positive  Rationale: The policy is equitable, but ensuring accessible formats for training or communication materials could have a positive impact on individuals with disabilities. Providing reasonable adjustments for disabled staff or students in reporting mechanisms further supports inclusivity.
<b>Gender Reassignment</b>	Impact: Neutral  Rationale: The policy treats all individuals fairly, regardless of gender reassignment status, with no specific provisions that would impact this characteristic. The focus on equitable treatment in reporting and investigation applies universally.
<b>Marriage and Civil Partnership</b>	Impact: Neutral  Rationale: The policy applies equally regardless of marital or civil partnership status, with no anticipated impact on individuals based on this characteristic.
<b>Pregnancy and Maternity</b>	Impact: Neutral to Positive  Rationale: Making policy information accessible to those on maternity or paternity leave (e.g., by ensuring updates and training materials are available remotely) could enhance support and transparency. This would help ensure inclusivity for those who may be temporarily absent.
<b>Race</b>	Impact: Neutral to Positive  Rationale: The policy applies equitably across all racial groups. Positive impacts could be achieved by ensuring that

	training and reporting mechanisms are available in accessible formats or languages if needed, supporting inclusivity for those from diverse linguistic backgrounds
<b>Religion or Belief</b>	Impact: Neutral  Rationale: The policy is inclusive and does not impact individuals based on religion or belief. The commitment to ethical practices aligns with the values of many belief systems, which may foster a positive association with the policy.
<b>Sex</b>	Impact: Neutral  Rationale: The policy is intended to apply fairly to all, irrespective of sex. The reporting, investigation, and prevention frameworks are designed to be inclusive and unbiased.
<b>Sexual Orientation</b>	Impact: Neutral  Rationale: The policy does not distinguish or impact individuals based on sexual orientation. It is designed to be inclusive, with equitable application and protections that promote ethical behaviour.

**Are you able to reduce any potential negative impacts identified? If so, how?**

N/A
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**Compliance with General Equality Duty**

**Does the policy, procedure or practice comply with the three parts of the general duty?**

- Eliminate discrimination, harassment and victimisation and other conduct prohibited by the [Equality Act \(2010\)](#)
- Foster good relations between people from different groups - this involves tackling prejudice and promoting understanding between people from different groups
- Advance equality of opportunity between people from different groups

Yes  No

**If no, what arrangements could be implemented to better comply with the duty?**

N/A

**What is the EIA outcome?**

A positive impact is likely  A negative impact is not foreseen

A negative impact is likely  A negative impact is probable or certain

Are you able to introduce the policy, procedure or practice without changes? Yes  No

**If no, what changes will you make before implementation?**

N/A

**Action and Monitoring**

What action will be taken, by whom and when?

Once implemented how the policy will, procedure or practice be monitored?

Policies are reviewed every 3 years by the policy lead or earlier if there is a legislative change

Signed: Annette McKenna / Amrit Kaur Bedi

Date: November  
2024

NB: Finalisation of central monitoring & identification of compound impact will be undertaken within Equalities Management. Please return to the EDI manager for approval by the EDI Committee

## **Appendix**

**Equality Act General Duty** requires colleges to have **due regard** to the need to:

**1. Eliminate**

- a) discrimination,
- b) harassment,
- c) victimization; or
- d) any other prohibited conduct

**2. Advance** equality of opportunity by

- a) removing or minimising disadvantage
- b) meeting the needs of particular groups that are different from the needs of others
- c) encouraging participation in public life

**3. Foster** good relations – tackle prejudice, promote understanding

### **Protected Characteristics:**

- 1. Age
- 2. Disability
- 3. Gender Reassignment
- 4. Marriage And Civil Partnership (applies only in relation to (1a) discrimination in *employment*, not to students)
- 5. Pregnancy And Maternity
- 6. Race
- 7. Religion Or Belief
- 8. Sex/ Gender
- 9. Sexual Orientation.