

Equality Impact Assessment Corporate Service Improvement Tool

| Details of the assessment | | |
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| Name of Policies being assessed: | Anti-Fraud and Corruption Strategy Housing & Council Tax Anti-Fraud Strategy | |
| Is the activity...? | New <input type="checkbox"/> (please go to step 1) Existing:Yes (please go to step 2) | |
| Date of assessment | 30 December 2010 | |
| Directorate & Service | Financial Services – Internal Audit | |
| Policy Owner | Council | |
| Lead Officer | David Buckley | |
| | Key Questions | Answers/Notes |
| Step 2 | Scoping the assessment | |
| 1. | What is the overall aim, or purpose of the function/ policy/service? | To encourage prevention, promote detection and support investigation of Fraud & Corruption. |
| 2. | What outcomes do you want to achieve with this function/ policy/service and for whom? | These strategies are for all stakeholders in order for them to understand the culture of this organisation towards fraud and corruption. They also set out how any suspicions of fraud will be investigated to ensure a consistent approach. Where there is evidence of misappropriation then recovery action will be considered. |
| 3. | Who is intended to benefit from the function/service/ policy? | The strategies are designed to ensure that all stakeholders can deal with the Council in an open and honest manner. |
| 4. | Who defines or defined the function/service/policy? | The strategies are written by the Chief Internal Auditor, reviewed by Audit Committee, Policy Overview Committee, Cabinet and endorsed by full Council. |
| 5. | Who implements the function/service/policy? | The strategies are intended to indicate the culture of the organisation and set out an attitude towards fraud and corruption that all stakeholders are expected to comply with. Implementation may be from a number of sources but the strategies are intended to apply consistency. |
| 6. | How do the outcomes of the function/service/policy meet or conflict other policies, values or | Please indicate which Sustainable Community Strategy (SCS) priority these outcomes relate to: Safer place <input type="checkbox"/> |

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| | objectives of the public authority (if applicable)? | Cleaner, smarter borough | <input type="checkbox"/> |
| | | Improving health & reducing inequalities | <input type="checkbox"/> |
| | | Protecting & enhancing the environment | <input type="checkbox"/> |
| | | Good local transport | <input type="checkbox"/> |
| | | Strong economy & decent housing | <input type="checkbox"/> |
| | | Any other comments: All fraud that is prevented or corrected will enable resources to be used elsewhere | |
| 7. | Are there any factors that could contribute or detract from the outcomes identified earlier? | Recovery of sums fraudulently claimed from the Council may take long periods to be recovered depending on amount and assets available to recover from. | |
| Step 3 | Consideration of data and information | | |
| 8. | What do you already know about who uses this function/service/policy? | Similar strategies have been in place for several years and they are regularly reviewed and circulated to staff. In addition there is a copy of them on the Council website and there are frequent referrals received from individuals outside of the Council of alleged fraud. | |
| 9. | Has any consultation with service users already taken place on the function/service/policy and if so what were the key findings? | These strategies are circulated to all staff using Net Consent and any feedback received is considered as part of the annual review. The last staff survey identified that a majority of staff believed that any concerns raised would be investigated. | |
| 10. | What, if any, additional information is needed to assess the impact of the function/service/policy? | None | |
| 11. | How do you propose to gather the additional information? | N/A | |
| Step 4 | Assessing the Impact | | |

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| 12. | Based on what information you already know, in relation to each of the following groups consider whether a) there is anything in the function/service/policy that could discriminate or put anyone at a disadvantage b) for an existing function/service/policy, how it is actually working in practice for each group | |
| a. | Equality groups | Age Age is considered as part of the evidence gathering process. |
| b. | | Disability Disability will be considered as part of the evidence gathering process. Any doctors reports are considered when determining how an investigation can progress. |
| c. | | Gender Effort will be made to ensure that no gender is put at a disadvantage if any concerns are raised |
| d. | | Race Translation services are available where appropriate |
| e. | | Religion/Belief Effort will be made to ensure that no Religion/Belief is put at a disadvantage if any concerns are raised |
| f. | | Sexual Orientation Effort will be made to ensure that no Sexual Orientation is put at a disadvantage if any concerns are raised |
| g. | | General/other Any investigation of fraud will consider any circumstances that mitigate the alleged breach. When considering the outcome of proven cases any sanction will use relevant guidelines to prevent putting someone at a disadvantage. For example, any potential prosecution will be considered using the Code for Crown Prosecutors. There have not been any allegations of discrimination made against the policy. |
| Step 5 | Reviewing and Scrutinising the Impact | |
| 13. | Have you identified any differential impact and does this adversely or positively affect any groups in the community? | Where there are fraud investigations the circumstances of the person being investigated are always considered before they are formally approached to provide an explanation. There is always the possibility that a person may be disadvantaged because the Council is not aware of any issues. However, if any of these issues come to light, then the investigation will be adjusted to take account of these issues. There is a formal procedure for conducting investigations which requires them to be carried out impartially. |
| 14. | Can we make any changes or improvements? | Where there are any instances where there is a suggestion of potential improvements they will be considered. |
| 15. | If there is nothing you can do, can the reasons be fairly justified? | All investigations are carried out impartially in compliance with Human Rights and other legislation designed to promote fair treatment. |
| 16. | Do any of the changes in relation to the adverse impact have a further | There may be an adverse effect on others involved in an investigation other than the person who is the subject of the allegation. These people are protected under the Disclosure Act |

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| adverse affect on any other group? | 1998 which requires the Council to provide support to them. |
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| Step 5 continued... | | Actions to be inserted into Equality Action Plans | | | |
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| Based on your answers in Step 5, please finalise your actions here. These actions will then be incorporated into our equality action plans. | | | | | |
| Equality Strand | Related SCS (or other) Priority | Action | Outcome/monitoring information and targets | Date for Completion | Responsible Officer |
| If an adverse impact was found or unmet needs identified, which actions will you put in place to address this: | | | | | |
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| If the impact is still unclear, list the actions you will put in place to gather the information you need: | | | | | |
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| If you did not find any evidence of unmet needs or adverse impact, list the actions you will put in place to maintain good practice: | | | | | |
| 1 | Both strategies will be reviewed on an annual basis. Any concerns raised regarding equality will be considered and where appropriate will be addressed in any update. | | Regular reporting to Members of any concerns raised as a result of these strategies | <i>Ongoing</i> | Chief Internal Auditor |
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| Step 6 Decision making and future monitoring | | |
| 17. | Which decision making process do these changes need to go through i.e. do they need to be approved by a committee/Council? | The strategies are regularly reviewed and endorsed by the Audit Committee, Policy Committee, Cabinet and full Council. |
| 18. | How will you continue to monitor the impact of the function/service/ policy on diverse groups? | Any issues raised under the strategies will be reported to Members. Making staff aware of the culture is intended to reduce the incidence of fraud and the low level of fraud found within the organisation is an indication that the culture and controls are working to prevent it. |
| 19. | When will you review this equality impact assessment? | This will be reviewed when the strategies are reviewed, normally on an annual basis. |
| Final steps | | |
| For an existing function/service/policy: Send your assessment to the West Kent Equalities Officer | | |
| For a new function/service/ policy: Summarise your findings in the committee report. Ensure planned consultations address the findings of this impact assessment. | | |