

## Equality Impact Assessment Corporate Assessment Template



<b>Policy/Strategy/Project/Procedure/Service/Function Title:</b> Counter-Fraud and Corruption Strategy
<b>New/Existing/Updating/Amending:</b> New

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Chris Pyke	Job Title: Audit Manager, Operational Manager
Service Team: Internal Audit	Service Area: Resources
Assessment Date: 13/05/2019	

### 1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?

<p>This Strategy is designed to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.</p> <p><b>Reporting Culture</b> - raising awareness of fraud risk and accountability for reporting, through training, communication activities and policy reviews. Members of the public must also know how and when to raise concerns.</p> <p><b>Strong Assurance</b> - fraud risks must be understood, monitored and managed, to deliver strong Council-wide assurance on fraud risk management.</p> <p><b>Ownership</b> - Everyone working for the Council needs to understand their personal responsibility for supporting counter-fraud risk management. Managers should consider this in Personal Review objective setting.</p>
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### 2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]

<p>'Fraud costs the public sector at least £20.6bn annually, and of this total, £2.1bn is specifically in local government.'</p> <p>The CIPFA Fraud and Corruption Tracker 2018 states that 17.8% of detected fraud in UK Local Authorities by volume, relates to disabled parking concession – individuals</p>
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without a legitimate blue badge, abusing the blue badge scheme.

The Investigation Team receives referrals from various sources, including members of staff and members of the public. The team produces quarterly progress reports to Audit Committee, which provide details of counter fraud activity including the number of and types of fraud referral. However, we do not currently have any equality monitoring data on the groups who are the subject of referrals. National publications and trends shape the risk assessment of fraud in Cardiff and determine the annual Investigation Team work plan.

Criminal investigations are conducted in accordance with the Police and Criminal Evidence Act, which sets out the rules relating to the treatment and questioning of persons under investigation.

Fraud from the public sector deprives vulnerable citizens of the help and support that they need.

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	X		
18 - 65 years	X		
Over 65 years	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud. There is a shortage of affordable / local authority housing. CIPFA estimate housing fraud to cost £216m.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to age. Increased work in this area would likely have a positive impact on the vulnerable.

#### 3.2 Disability

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

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	Yes	No	N/A
Hearing Impairment	X		
Physical Impairment	X		
Visual Impairment	X		
Learning Disability	X		
Long-Standing Illness or Health Condition	X		
Mental Health	X		
Substance Misuse	X		
Other	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud. Concerns relating to the abuse / misuse of residential (permit) parking and the blue badge scheme should be reported and therefore, there is a potential for more spaces to become available to those persons entitled to park. Additionally increased focus on tenancy fraud could also have a positive outcome.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to disability.

### 3.3 Gender Reassignment

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to gender.

### 3.4. Marriage and Civil Partnership

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

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	Yes	No	N/A
Marriage	X		
Civil Partnership	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to marriage and civil partnership.

### 3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	X		
Maternity	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to pregnancy and maternity.

### 3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White	X		
Mixed / Multiple Ethnic Groups	X		
Asian / Asian British	X		
Black / African / Caribbean / Black British	X		
Other Ethnic Groups	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud.

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**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to race.

**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist	X		
Christian	X		
Hindu	X		
Humanist	X		
Jewish	X		
Muslim	X		
Sikh	X		
Other	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to religions, beliefs or non-beliefs.

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men	X		
Women	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on men and/or women.

**3.9 Sexual Orientation**

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Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual	X		
Gay Men	X		
Gay Women/Lesbians	X		
Heterosexual/Straight	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Public funds should be more secure / zero tolerance to fraud.

**What action(s) can you take to address the differential impact?**

There are no concerns that the policy could have a negative differential impact on people due to Sexual Orientation.

#### 3.10 Welsh Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

#### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

A copy of the strategy and Equality Impact Assessment (EIA) was shared with the Equality Team, the potential was discussed with two lead equality officers and the content of the EIA was amended as appropriate to cover the advice received.

The Corporate Director Resources attended the Trade Union partnership meeting on the 17<sup>th</sup> June 2019 and provided an opportunity to discuss the strategy.

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#### 5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	The actions required are generic to all groups and included below.
Disability	The actions required are generic to all groups and included below.
Gender Reassignment	The actions required are generic to all groups and included below.
Marriage & Civil Partnership	The actions required are generic to all groups and included below.
Pregnancy & Maternity	The actions required are generic to all groups and included below.
Race	The actions required are generic to all groups and included below.
Religion/Belief	The actions required are generic to all groups and included below.
Sex	The actions required are generic to all groups and included below.
Sexual Orientation	The actions required are generic to all groups and included below.
Welsh Language	The actions required are generic to all groups and included below.
Generic Over-Arching [applicable to all the above groups]	<p>In order to achieve the aims of the Strategy, the approach must be accessible and inclusive in respect of the needs of all individuals within the Council, service providers / users and the citizens of Cardiff.</p> <p>A communications lead has been appointed to ensure that the awareness campaign is tailored and relevant to the intended audience, taking into account the relevant demographics.</p> <p>A fraud awareness, eLearning module has been procured from an external supplier, this has been tailored in-house to the needs of the Council and incorporates the Counter-Fraud and Corruption Strategy. It is suitable for a wide audience and will be translated into Welsh.</p> <p>Various communication methods will be utilised, which may include, Twitter, Facebook, press releases, communications briefings. Workshops, face-to-face training and drop in sessions will also be offered to ensure that individuals based at satellite locations and non-computer users are fully engaged.</p> <p>Taking the above into account, there will be no adverse impact on any Equality groups or Protected Characteristics, as the Strategy will support the Council in its duty to protect public funds from illegal activity and to comply with legislation. In fact, the deterrence of fraud will be of general benefit to all groups. Robust processes dealing with fraud, will reinforce the integrity of the Council.</p>

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#### 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : David Hexter	Date: 11 <sup>th</sup> June 2019
Designation: Group Auditor (Investigations)	
Approved By: Chris Pyke	17 <sup>th</sup> June 2019
Designation: Audit Manager, Operational Manager	
Service Area:	Resources

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 2536 / 3262 or email [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)