

# Single Impact Assessment

Cardiff Council

6.1 Appendix F



## 1. Details of the Proposal

### What is the proposal?

Title: Sanction Procedure

### Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Existing

### Directorate/Service Area:

Resources / Finance

### Who is developing the proposal?

Name: Chris Pyke

Job Title: Audit Manager, Operational Manager

### Responsible Lead Officer (Director or Assistant Director):

Chris Lee, Corporate Director Resources

### Cabinet Portfolio:



Authorisation	
Completed By:	David Hexter
Job Title:	Group Auditor (Investigations)
Date:	6 July 2023
Approved By:	Chris Pyke
Job Title:	Audit Manager

**Document History – do not edit**

*The Single Impact Assessment (SIA) can be strengthened as time progresses, helping shape the proposal. Version control will provide a useful audit trail of how the SIA has developed. Draft versions of the assessment should be retained for completeness, however only the final version will be publicly available. Draft versions may be provided to regulators if appropriate.*

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023

## 2. Overview of the Proposal

### **What action is the Council considering and why?**

*Please provide a detailed outline of the proposal. This information will support your findings in the impact assessments.*

The Counter-Fraud and Corruption Sanction Procedure is aligned to the Council's Counter Fraud, Bribery and Corruption Strategy, which communicates a zero-tolerance approach, and encourages and promotes fraud prevention and detection.

The strategy has a core objective 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.

As part of the strategic response to fighting fraud, the Council has communicated how it will pursue and punish fraudsters by using civil sanctions, recovering losses, and supporting the law enforcement response. In carrying out its functions and responsibilities, the Council seeks to promote a culture of openness and fairness and expects all those who work for and within the Council to adopt the highest standards of propriety and accountability.

The Council fully recognises its responsibility for good financial management so that public money is safeguarded at all times and used appropriately, efficiently and effectively. The prevention, and if necessary, the investigation, of fraud, bribery and corruption is therefore seen as an important aspect of its duties, which it is committed to undertake.

'Fraud costs the public sector at least £50.2bn annually, and of this total, £8.8bn is specifically in local government.' The CIPFA Fraud and Corruption Tracker 2020 states that 65.1% of detected/prevented fraud in UK Local Authorities by volume, relates to council tax fraud – individuals inappropriately receiving a discount, exemption, or discount.

### **What are the costs and/or savings?**

*What will the proposal cost and how will it be funded?*

*How might costs be reduced through involvement and collaboration, across Cardiff Council and/or with external stakeholders?*

*Are there savings and how will these be realised?*

Cost neutral

## Impact Assessments

### Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.**

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Yes
B. Child Rights Impact Assessment	No
C. Welsh Language Impact Assessment	Yes
D. Habitats Regulations Assessment	No
E. Strategic Environmental Assessment	No
F. Data Protection Impact Assessment	No
G. Health Impact Assessment	No

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact** [positive/negative] on different age groups?

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

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

It is not anticipated that the procedure will have a differential impact on younger/older people. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people of all ages.

### Disability

Will this proposal have a **differential impact** [positive/negative] on disabled people?

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

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

It is not anticipated that the procedure will have a differential impact on disabled people. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including disabled people.

**Gender Reassignment**

Will this proposal have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)		✓	

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

It is not anticipated that the procedure will have a differential impact on transgender people. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including Transgender people.

**Marriage and Civil Partnership**

Will this proposal have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage		✓	
Civil Partnership		✓	

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

It is not anticipated that the procedure will have a differential impact on marriage and civil partnership. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people who are married or in a civil partnership.

**Pregnancy and Maternity**

Will this proposal have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy		✓	
Maternity		✓	

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

It is not anticipated that the procedure will have a differential impact on pregnancy and maternity. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people who are pregnant or in their maternity period.

**Race**

Will this proposal have a **differential impact [positive/negative]** on the following groups?

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

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

It is not anticipated that the procedure will have a differential impact in respect of race. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people from all ethnicities and backgrounds.

### Religion, Belief or Non-Belief

Will this proposal have a **differential impact** [positive/negative] on people with different religions, beliefs or non-beliefs?

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

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

It is not anticipated that the procedure will have a differential impact on people with different religions, beliefs or non-beliefs. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people of all faiths and beliefs.

### Sex

Will this proposal have a **differential impact** [positive/negative] on male, female or non-binary persons?

	Yes	No	N/A
Male persons		✓	
Female persons		✓	
Non-binary persons		✓	

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

It is not anticipated that the procedure will have a differential impact on men and/or women. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of sex.



**Sexual Orientation**

Will this proposal have a **differential impact** [positive/negative] on people with different sexual orientations?

	Yes	No	N/A
Bi		✓	
Gay		✓	
Lesbian		✓	
Heterosexual		✓	
Other		✓	

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

It is not anticipated that the procedure will have a differential impact in respect of sexual orientation. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of sexual orientation.

**Socio-economic Duty**

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact		✓	

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

It is not anticipated that the procedure will have a differential impact in respect of Socio-economic Duty. The procedure supports the Council in its duty to protect public resources.

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

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of Socio-economic status.

## Welsh Language

Will this proposal have a **differential impact** [positive/negative] on the Welsh language?

	Yes	No	N/A
Welsh language	✓		

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

The Sanction Procedure will have a potentially positive impact on the Welsh language as it provides the ability of both the public and staff members to understand and report on matters of fraud in their chosen language.

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

Through engagement with Bilingual Cardiff, mitigating actions have been incorporated, this includes recognising the importance of the Welsh Language Standards, processes in place to seek advice from Bilingual Cardiff, specifically in relation to translations and language queries. Having existing arrangements to ensure the ability to communicate with individuals and progress fraud issues and concerns in other languages as required.

## Consultation and Engagement

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

A copy of the Counter-Fraud, Bribery and Corruption Strategy and this Sanction Procedure have been shared with the Equality Team and Bilingual Cardiff. Discussions ensued and working with Bilingual Cardiff, mitigating factors were developed jointly. A process of consultation and engagement will take place, with Trade Union consultation taking place prior to Cabinet consideration in October 2023.

## Summary of Actions (Listed in the sections above)

	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable
Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Socio-economic Impact	Not applicable
Welsh Language	Not applicable

Generic/ Over-Archiving (applicable to all the above groups)	Not applicable
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### **Next Steps**

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.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

# C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## Welsh Language Standards 88-97

### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?	✓		
Treating the Welsh language no less favourably than the English language?	✓		

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

The core objectives of the Counter-Fraud Strategy and Sanction Procedure will be beneficial to all, engagement has been undertaken with Bilingual Cardiff and the Sanction Procedure has been reviewed to ensure that the Welsh language is not treated less favourably than the English language.

Working with Bilingual Cardiff mitigating factors were considered and developed jointly.

The Counter-Fraud Strategy and Sanction Procedure recognise that local authorities in Wales have a statutory duty to comply with the Welsh language standards. A process is in place to ensure that advice is sought at the appropriate time in order to obtain translations and resolve language queries.

Members of the public have a legal right to receive services from the Council in English or Welsh according to their choice. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.

**Standard 89**

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 90**

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 91**

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 92**

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 93**

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 94**

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council’s Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 95**

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

## Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

## Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

- [Correspondence](#) - receiving and replying (emails, letters, online communication).
- [Telephone](#) – receiving and answering calls.
- [Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.
- [Public Messages – electronic – video](#)
- [Signs, Notices & Display Material](#)
- [Publicity & Advertising](#)
- [Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.

- [Producing Forms](#)
- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>
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Yes
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### Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>
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Yes
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### Next Steps

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)