

## Derbyshire Dales District Council Equality Impact Assessment



Please refer to the guidance whilst completing this form.

Please contact Claire Allen [Claire.allen@derbyshiredales.gov.uk or 01269 761240] for support.

### 1. Outline

| Information required   | Detail   |
|--|--|
| a. Title of policy, practice, service or function being assessed | Anti-Fraud, Bribery and Corruption Strategy (including Anti-Money Laundering Policy) October 2023  |
| b. Links to Service and/or Corporate Plan Ref/s                  | The maintenance of an up-to-date Anti-Fraud, Bribery and Corruption Strategy contributes to the Council's core values of being open and transparent when making decisions and using public resources ethically and responsibly.  |
| c. Name and Role of Officers conducting assessment               | Karen Henriksen, Director of Resources   |
| d. Date of assessment  | October 2023   |
| e. Reason for assessment   | A review of the current Strategy has taken place. Approval for an updated strategy is to be sought from the Governance & Resources Committee on 2 November 2023. No significant changes from the current version are proposed but there is no evidence of an EIA for current/earlier versions of the strategy. |

| Information required   | Detail  |
|--|---|
|  | The review is an opportunity to promote the Council's key messages within the Anti-Fraud, Bribery and Corruption Strategy to all employees and elected members.   |
| f. What is the purpose of this policy, practice, service or function? (specify aims and objectives)  | <p>The Anti-Fraud, Bribery and Corruption Strategy (including Anti-Money Laundering Policy) is designed to: -</p> <ul style="list-style-type: none"> <li>• provide a clear statement of values in relation to these issues;</li> <li>• encourage prevention;</li> <li>• promote detection,</li> <li>• act as a deterrent; and</li> <li>• set out a clear approach for investigation of any concerns, complaints etc.</li> </ul> |
| g. Are there any other organisations involved in its implementation?                                 | The Council expects all partners in both public and private sectors to establish robust and transparent governance arrangements. Partner organisations that deliver council services (such as Chesterfield BC who delivers the revenues and benefits service) will be expected to comply with the Strategy.   |
| h. Likely customer groups to be impacted   | The strategy will mainly benefit employees of DDDC and relevant partner organisations by giving them a clear set of guidelines to follow and an understanding of their responsibilities in relation to the reporting of fraud, bribery and corruption. Elected members at DDDC will also benefit.   |
| i. Other stakeholders likely to be impacted  | Elected members<br>Employees<br>Organisations associated with the Council   |
| <b>Which District Council departments are affected by the policy, practice, service or function?</b> | All   |

| Information required  | Detail |
|---|--------|
| Do any of the objectives directly support or hinder another Council activity? | No     |

## 2. Assessing Relevance to the General Equality Duty

| The General Equality Duty has three aims which require the District Council to have due regard to the need to:  | Tick those which are relevant ✓ |
|---|---------------------------------|
| 1. Eliminate unlawful discrimination (both direct or indirect), harassment and victimisation  | ✓                               |
| 2. Advance equality of opportunity between all persons by <ul style="list-style-type: none"> <li>• removing or minimising disadvantages suffered by protected groups;</li> <li>• taking steps to meet the needs of people from protected groups where these are different from the needs of other people</li> <li>• encouraging people from protected groups to participate in public life or other activities where participation is disproportionately low</li> </ul> |                                 |
| 3. Foster good relations between different groups   |                                 |

**3. What existing information / data do you have / monitor about different diverse groups in relation to this policy, practice, service or function?**

For example: previous EIA's, reports, consultation, surveys, demographic data etc.

| <b>Information / Data</b>   | <b>Data source and date</b> | <b>Information relevant to proposed policy/service/function</b> |
|---|-----------------------------|---|
| Derbyshire Dales District Council currently has 226 employees and 34 elected members. |                             |   |
|   |                             |   |
|   |                             |   |

#### 4. Consultation and engagement

4a. if no consultation has taken place OR is unnecessary, please explain why.

|  |
|--|
| Public consultation is <b>not</b> required, as this is an internal policy. |
|--|

4b. Add the results of any completed consultation and how it has/will inform the development of the policy/service.

| Who <u>did</u> you consult with? | How and when | Outcomes/Results | Implications and amendments as a result of consultation |
|----------------------------------|--------------|------------------|---|
| N/A                              |              |                  |   |
|                                  |              |                  |   |
|                                  |              |                  |   |

4c. Add consultation plans and results here

Think about who the stakeholders are? How will you gather their views? By when?

Remember to complete a Consultation Proposal form to access support and refer to the guides – everything you need is here

<X:\Partnerships and Projects\Consultation All Directorates\Strategies Guidance Resources>

| Who <u>will</u> you consult with? | How and When | Results | Implications and amendments as a result of consultation |
|-----------------------------------|--------------|---------|---|
| N/A                               |              |         |   |

**5. Based on the evidence above, does the policy, practice, service or function have a positive or negative impact on any protected group(s)?**

| Protected groups   | Positive effects | Negative effects | No Impact | Potential Improvement Actions |
|--|------------------|------------------|-----------|-------------------------------|
| <b>Age</b>   |                  |                  | ✓         |                               |
| <b>Disability or long-term ill health</b><br>Physical disabilities, sensory impairments, limiting long-term illnesses, learning disabilities or mental health issues |                  |                  | ✓         |                               |
| <b>Race / ethnic groups</b>  |                  |                  | ✓         |                               |
| <b>Women or men</b>  |                  |                  | ✓         |                               |
| <b>Sexual orientation</b>  |                  |                  | ✓         |                               |
| <b>Religion or belief (including non-belief)</b>   |                  |                  | ✓         |                               |
| <b>Transgender</b> (including people planning to or going through gender reassignment)   |                  |                  | ✓         |                               |
| <b>Pregnancy and maternity</b> (including maternity and paternity leave)   |                  |                  | ✓         |                               |
| <b>Marital status</b> (including civil partnership & same sex marriage)  |                  |                  | ✓         |                               |

**5a. Are there any local priority groups / factors which should be considered?**

| Other factors         | Positive effects | Negative effects | Improvement actions |
|-----------------------|------------------|------------------|---------------------|
| Rural areas           | N/A              |                  |                     |
| Poverty / deprivation | N/A              |                  |                     |

**6. Commissioned / outsourced services**

|   |   |
|---|---|
| Is your policy, practice, service or function partly or wholly provided by any external organisation / agency?  | Yes, Chesterfield Borough Council delivers the revenues and benefits service and are expected to comply with this policy under the terms of the Service Level Agreement.  |
| If yes, please list any contractual or other arrangements which aim to ensure that the provider promotes equality and diversity (e.g., <i>monitoring data</i> ) | <p>The Revenues and Benefits Service Level Agreement between Derbyshire Dales District Council and Chesterfield Borough Council includes the following in the list of relevant policies:</p> <ul style="list-style-type: none"> <li>• Anti-Fraud, Bribery and Corruption Strategy (including Money Laundering Policy)</li> <li>• Equality and Diversity Policy</li> <li>• Procurement Equalities Policy.</li> </ul> |

## 7. Summary

Use this space to summarise key data and its implications, the key issues to be addressed, potential actions to address them and any other points relevant to the Policy/service.

The updated strategy is not anticipated to have a disproportionate impact on any protected group.

The application of the strategy affects two broad categories of people – employees and external individuals. The policy deals with the Council's approach to members of staff who commit fraud. In taking formal action against staff as a result of a fraud investigation, we are bound by the disciplinary process. The policy also deals with the approach to customers, suppliers and others who defraud the Council, such as those applying for Housing Benefit or Council Tax Support. In undertaking external investigation, we are bound by the Police and Criminal Evidence Act and the Criminal Procedure and Investigations Act. There is nothing in the framework that suggests particular groups would be adversely affected by the Strategy as the decision-making which arises from the framework is based on factors which have no relevance to age, race, gender, sexual orientation, religious belief or disability. For example, the decision to take prosecution action against an individual is based upon evidential and public interest tests.

However, it is acknowledged that when conducting investigations into benefit claimants, those in receipt of council tax support or other service users, it could be argued that certain groups are worse financially off than others and therefore it could be argued that they are more likely to claim benefits or support or to use such services and hence more likely to be investigated.

This potential for bias has been recognised and can be mitigated by evidential tests being undertaken by the investigating officer and by a more senior officer reviewing each case using objective criteria such as the potential value of the fraud and the standard of evidence available.



## 8. Improvement Plan

| Key issues identified | Actions |
|-----------------------|---------|
| N/A                   |         |
|                       |         |
|                       |         |

**PLEASE FORWARD THE COMPLETED FORM TO THE POLICY MANAGER / POLICY OFFICER (Consultation & Equalities)**

Signed: *Karen Henriksen* Director of Resources (Completing Officer)

13 October 2023