

Customer Access Review – Full Assessment

Assessment details		
Assessment area	Anti-Fraud And Corruption Strategy	
Date of assessment	8 th December 2016	
Directorate and Service	Strategic Director (Internal Services)	
Manager	Bami Cole, Audit Risk & Anti-Fraud Manager	
Officer conducting assessment	Lisa Nyon – Principal Auditor	
Step 1: Scoping the assessment		
1	What are the aims and objectives of the activity or proposal?	<ul style="list-style-type: none"> To encourage prevention and promote detection of Fraud and Corruption within the Council. To ensure that potential users of the policy understand how to access the procedure and what processes will be followed. To support the Council’s commitment to provide highest possible standards of openness, probity and accountability both as an employer and as a provider of services. Outline expectations of those who associate with the Council to act with propriety and accountability.
2	Who will be affected?	Employees, stakeholders (such as contractors, and partners and consultants), Members and Co-opted Members.
3	How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	It meets the following objective in the Corporate Plan:- “To deliver high quality services, offering value for money and demonstrating customer satisfaction and a culture of continuous improvement”.
4	Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?	<p>The Fraud Act 2006 and The Bribery Act 2010.</p> <p>Although not requiring the Council to set up an appropriate mechanism for dealing with Fraud and Corruption, makes clear the important role that such a mechanism can play in helping the Council comply with the law.</p> <p>Section 151 of the Local Government Act 1972, to ensure the proper arrangements of the Councils financial affairs.</p>

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Step 2: Information collection	
Note: Equality and Diversity information for Dartford can be found at http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data	
5	<p>What do you know about the groups of people who will be affected? i.e. demographic information in relation to the protected characteristic groups (age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment)</p>
	<p>Via employment and diversity framework at the council.</p> <ul style="list-style-type: none"> • 63.3% of staff are women and 36.7% are male • 7.7% are from a BME community • 8.4% have a disability • Most employees are aged between 51 to 55 years
6	<p>What consultation has taken place with affected groups? Please describe who was consulted and the key findings</p>
	<p>No staff consultation has been carried out on this latest review of the policy as there were no fundamental changes in the process in which Fraud and Corruption incidents can be reported.</p>
7	<p>Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</p>
Step 3: Assessing the equality impact	
8	<p>Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the General Equality Duty:</p> <p>a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

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		POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
a	Age	All age groups		<input checked="" type="checkbox"/>	<input type="checkbox"/>
b	Disability	The policy is available in alternative formats, such as braille, larger fonts and audio tape.		<input type="checkbox"/>	<input type="checkbox"/>
c	Gender (including reassignment)			<input checked="" type="checkbox"/>	<input type="checkbox"/>
d	Race	The document can be translated on request		<input type="checkbox"/>	<input type="checkbox"/>
e	Religion/Belief			<input checked="" type="checkbox"/>	<input type="checkbox"/>
f	Sexual Orientation			<input checked="" type="checkbox"/>	<input type="checkbox"/>
g	Pregnancy/Maternity			<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	If 'no impact' or 'unknown' was selected, please explain	The Anti-Fraud and Corruption Strategy applies to everyone regardless of whether they have a protected characteristic or not.			
10	If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	Dartford Borough Council works in partnership with Sevenoaks District Council to deliver joint Revenues and Benefits Services, Internal Audit and Counter Fraud that would help to prevent and detect fraud. There are no circumstances that would give rise to negative equality impacts.			
11	Any other comments	<p>The Anti-Fraud and Corruption Strategy ensures that if a member of staff raises a concern, this member of staff has access to protection against discrimination and victimisation for raising an issue (via the Whistleblowing Policy).</p> <p>The policy covers examples of the types of concerns it is intended to cover, including detecting of fraud, corruption and bribery and how those connected to the Council are expected to behave.</p> <p>There are clear routes and a choice of options for raising a concern under the Strategy, including via direct line manager, or an officer listed in the Strategy. Advice and guidance on how matters of concern may be pursued can be sought from various named officers. If employees feel unable to raise their concerns through any of the internal routes then they may wish to raise them through Public Concern at Work, a registered charity whose services are free and strictly confidential.</p>			

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		Ensuring staff are aware of the Strategy is important for making sure they understand how to raise concerns, are confident in doing so knowing that they are protected from possible reprisals. There is a need to continue with staff awareness raising and so the latest edition of the Strategy will be promoted through an announcement on the Intranet and annually upon review.			
Step 4: Action plan					
12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:					
a) any gaps in information and consultation					
b) how any negative impacts on equality will be mitigated or eradicated					
a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?					
Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?					
Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
All employees, contractors and partners are aware of and have access to the policy	To communicate policy via the DBC officers intranet	To raise awareness of the Strategy		On a yearly basis	Lisa Nyon – Principal Auditor.

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Step 5: Decision making and future monitoring		
13	Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Strategic Director Internal Services
14	How will you continue to monitor the impact of the activity or proposal on the equality groups?	Through annual review of the policy which will take into consideration the views of users of the policy.
15	When will you review this Customer Access Review?	Annually
Step 6: Final steps		
16	Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer	
17	If the subject of the Customer Access Review is going to committee, summarise your findings in the committee report	
18	Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded	