

# EQUALITY IMPACT ASSESSMENT

Care Group / Corporate Service:

Finance

Name of Service/Title of Policy or Strategy, Name of Event:

Fraud, Bribery and Corruption Policy

Equality Impact Assessment Undertaken by:

Amanda Smith, Counter Fraud Specialist

Service:

Policy:

Event:

Strategy:

Date undertaken:

12/07/2022

## Questions

**1. What are the main aims and purposes of the Policy / Service / Event or Strategy?**

The purpose of this policy is to promote a strong anti-fraud, bribery and corruption culture throughout the Trust. This will be achieved by;

Informing staff of the risks of fraud, bribery and corruption;

Advising staff of what they should do if they suspect fraud, bribery and corruption is occurring;

Inform staff of the process followed when fraud, bribery or corruption is suspected.

This is an existing policy that is being reviewed.

**2. Who is involved in delivering the service, implementing the policy or strategy / organising the event? (i.e., partnerships, stakeholders or agencies)**

This policy is a Trust wide policy, the CFS and Director of Finance are responsible for the plan of counter fraud work that is implemented within the Trust.

**3. What information / data or experience can you draw on to provide an indication of the potential inclusive / exclusive results of delivering this service or event / implementing the policy or strategy to different groups of people and the different needs of people with protected characteristics in relation to this policy / service / event or strategy?**

The policy is consistent in the investigation of fraud, irrespective of sex, sexual orientation or marital status.

All criminal investigations undertaken by the CFS are conducted in accordance with relevant legislation.

Protected Characteristics	Positive Impact	Negative Impact	Reasons for Impact
<b>Age</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against older or younger people
<b>Disability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone with a disability
<b>Gender reassignment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic
<b>Marriage and civil partnership</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic.
<b>Pregnancy and maternity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic.
<b>Race</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic.
<b>Religion or belief</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic.
<b>Sex</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic.
<b>Sexual Orientation</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic.

Protected Characteristics	Positive Impact	Negative Impact	Reasons for Impact
Disadvantaged groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is nothing in this policy that will directly discriminate against someone who falls within this protected characteristic.

**4. What positive impacts are there for this policy / service / event or strategy to better meet the needs of people with protected characteristics?**

The positive impacts for this policy are that it has been developed to provide a clear process and policy framework for the Trust to counter fraud, bribery and corruption.

**5. What action would be needed to ensure the policy / service / event or strategy overcomes:**

- Discriminatory negative impacts
- Exclusion

Failure to meet the needs of people from across the protected characteristics and opportunities for promoting equality and inclusion are maximised.

The policy will be publicised to all staff and training provided in varying formats to ensure a fair and consistent application of the policy across the organisation.

**6. Recommended steps to avoid discrimination and ensure opportunities for promoting equality and inclusion are maximised. Include:**

Options for action	Explanation if no further action is required	Lead responsible for overseeing actions	Timescales	Costs (where applicable)
Face to face training takes into account any communication barriers	N/A	CFS	N/A	N/A
All training materials available in large print or on coloured paper	N/A	CFS	N/A	N/A

**7. Monitoring and reporting arrangements of EIA, for policies and strategies refer to section 7 of the Procedural Documents (Development and Management) Policy.**

For services / events please include the following:

Area for Monitoring	How	Who by	Reported to	Frequency
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Delivery of Counter Fraud, Bribery and Corruption Plan	Agreed work plan	CFS	Director of Finance & Audit Committee	Quarterly
Staff questionnaire on fraud, bribery and corruption awareness	Survey to be completed Bi-annually	CFS	Director of Finance & Audit Committee	Bi-Annually

- How the equality impact of the service will be monitored
- Frequency of monitoring
- How the monitoring results will be used and where they will be published;
- Who will be responsible for reviewing monitoring results and initiating further action where required
- Any changes that have been made to remove or reduce any negative impacts as a result of conducting the equality impact assessment?
- Any action points should be included in Care Group / Corporate action plans, with monitoring and review processes.

**Is further work / consultation required? If yes, please explain how this is to be carried out and the time frame for completion.**

Yes  No

The Equality Impact Assessment will be reviewed in line with changes to services, client or staff groups, legislation or policy review.

**Name:**

Amanda Smith

**Designation:**

Counter Fraud Specialist

**Signature:**

A Smith

**Date:**

12-07-2022