

Colchester Borough Homes

Equality Impact Assessment Form - An Analysis of the Effects on Equality

Section 1: Initial Equality Impact Assessment

Name of policy/ decision to be assessed:

Prevention of Fraud, Corruption and Money Laundering Policy

1. What is the main purpose of the policy?

This policy provides an overview of the measures to combat any attempted fraudulent or corrupt act, and to outline the process we have in place to prevent or report on suspected money laundering activities.

2. What main areas or activities does it cover?

- Making false claims for expenses, overtime, flexitime, or any other allowance;
- Not declaring a conflict of interest
- Allocating housing, or any other benefits, to people who are not entitled to them;
- Using our vehicles, equipment, offices/buildings, stocks, or any other resources for personal use, or to run a private business;
- Stealing money, materials or other resources from CBH or our partners or customers;
- Raising orders, or submitting invoices for payment for work or services that have not been received or are not required;
- Working for another organisation, running a business, or being self-employed during contracted hours;
- Accepting gifts or hospitality from contractors or organisations bidding for work or those which receive grants from us

3. Are there changes to an existing policy being considered in this assessment? If so what are they?

The Policy is being assessed afresh since this version (1.3) is a major revision.

4. Who are the main audience, users or customers who will be affected by the policy?

- CBH Staff
- CBH Board Members
- CBH customers

5. What outcomes do you want to achieve from the policy?

- Prevention and elimination of fraud, corruption and money laundering
- Full investigation of identified concerns
- Full compliance with all relevant legislation and best practice.

6. Are other service areas or partner agencies involved in delivery? If so, please give details below:

- Colchester Borough Council
- External and internal auditors
- Insurers

7. Are you aware of any relevant information, data, surveys or consultations which help us to assess the likely or actual impact of the policy upon customers or staff?

- Internal auditor

8. The 'general duty' states that we must have "due regard" to the need to:

- (a) eliminate unlawful discrimination, harassment and victimisation
- (b) advance equality of opportunity between people who share a 'protected characteristic'¹ and those who do not²
- (c) foster good relations between people who share a protected characteristic and those who do not³

The policy helps us to 'eliminate unlawful discrimination, harassment and victimisation' in the following way(s):

- The policy does not specifically help us to meet the general duty.

¹ The Equality Act's 'protected characteristics' include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief and sex and sexual orientation. It also covers marriage and civil partnerships, but not for all aspects of the duty.

² This involves having due regard, in particular, to the need to: (a) remove or minimise disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it, and (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

³ This involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.

The policy helps us to ‘advance equality of opportunity...’ in the following way(s):

- The policy does not specifically help us to meet the general duty.

The policy helps us to ‘foster good relations...’ in the following way(s):

- The policy does not specifically help us to meet the general duty.

9. This section helps us to identify any disproportionate impacts. Please indicate in the table below whether the policy is likely to particularly benefit or disadvantage any of the ‘protected characteristics’.

‘Protected characteristic’ group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Age	Older people (60+)		None identified		None identified
	Younger people (17-25) and children (0-16)		None identified		None identified
Disability	Physical		None identified		None identified
	Sensory		None identified		None identified
	Learning		None identified		None identified
	Mental health issues		None identified		None identified
	Other – <i>specify</i>		None identified		None identified
Ethnicity ⁴	White		None identified		None identified
	Black		None identified		None identified
	Chinese		None identified		None identified
	Mixed Ethnic Origin		None identified		None identified
	Gypsies/ Travellers		None identified		None identified
	Other – <i>please state</i>		None identified		None identified
Language	English not first language		None identified	X	The Policy is in English.

⁴ National Census 2011 categories are: Bangladeshi, Indian, Pakistani, Other Asian (Asian or Asian British), African, Caribbean, Other Black (Black or Black British), White and Black African, White and Asian, White and Black Caribbean (Mixed), British, Irish, Other White (White), Chinese, Other (Other Ethnic Group).

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks		None identified		None identified
Religion or Belief	People with a religious belief (or none)		None identified		None identified
Sex	Men		None identified		None identified
	Women		None identified		None identified
Gender Reassignment ⁵	Transgender/ Transsexual ⁶		None identified		None identified
Sexual Orientation	Bisexual, Heterosexual, Gay or Lesbian		None identified		None identified
Marriage and Civil Partnership	People who are married or in a civil partnership		None identified		None identified

10. If you have identified any negative impacts (above) how can they be minimised or removed?

Negative impact: *The policy is in English*

Staff are able to access a range of translation and interpreting services should this be required.

⁵ The protected characteristic of gender reassignment is defined by the Equality Act 2010 as “a person proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.” This is a personal process that may involve medical interventions such as counselling, psychotherapy, hormone therapy or surgery, but does not have to.

⁶ It is generally held that people who are *transgender* disguise their features or clothing to resemble their preferred sex, whereas people who are *transsexual* wish to change their body to completely resemble their preferred sex.

11. Could the policy discriminate⁷ against any 'protected characteristic', either directly or indirectly⁸? **No**

Summary and findings of Initial Equality Impact Assessment

12. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
No negative impacts have been identified <input type="checkbox"/>	Sign off screening and finish.
Negative impacts have been identified but have been minimised or removed X	Sign off screening and finish.
Negative impacts could not be minimised or removed <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.
There is insufficient evidence to make a judgement. <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.

13. Name and job title of person completing this form:

- Cong Gu

14. Date of completion:

- February 2020

15. Date for update or review of this screening:

- When the Policy is Reviewed (from April 2021)

⁷ The Council has a general duty to 'eliminate unlawful discrimination, harassment and victimisation'. Direct discrimination occurs when a person is treated less favourably than another in a comparable situation because of their 'protected characteristic' whether on grounds of age, disability, pregnancy and maternity, ethnicity; religion or belief; sex (gender), sexual orientation, or marriage and civil partnership. Indirect discrimination occurs when an apparently neutral provision or practice would nevertheless disadvantage people on the grounds of their 'protected characteristic'.

⁸ If you answer 'yes' to question 11 (above) you will need to complete this section *and* go on to complete Section 2 in order to conduct a full Equality Impact Assessment.