Introduction

The report records the information that has been submitted for this equality analysis in the following format.

Overall Purpose

This section identifies the purpose of the Policy and which types of individual it affects. It also identifies which equality strands are affected by either a positive or negative differential impact.

Relevant Protected Characteristics

For each of the identified relevant protected characteristics there are three sections which will have been completed.

- Impact
- Consultation
- Additional Work

If the assessment has raised any issues to be addressed there will also be an action planning section.

The following pages record the answers to the assessment questions with optional comments included by the assessor to clarify or explain any of the answers given or relevant issues.
1 **Activity Type**

The activity has been identified as a Reviewed Policy.

2 **Overall Purpose**

2.1 **What the Activity is for**

| What is the purpose of this Policy and expected outcomes? | The Anti-Fraud and Corruption Policy provides a framework for preventing and tackling fraudulent and corrupt acts against Birmingham City Council (BCC). The Policy forms part of the Council's governance arrangements. Its purpose is to minimise the risk of fraud occurring, achieve public confidence, minimise losses to fraud and corruption and to satisfy the legislative requirements to have proper arrangements in place for the Council's financial affairs. The purpose of the Policy is to outline BCC's approach, as well as defining roles and responsibilities for dealing with the threat of fraud and corruption both internally and externally. The expected outcome of having this policy in place is to continue to prevent and tackle fraud. In 2013/14 general fraud investigations concluded during the year totalled 172 with a further 133 investigations completed in 2014/15. We would expect similar levels of investigations in forthcoming years as we continue to increase our levels of proactive activity to put a greater emphasis on strengthening our systems so that we stop fraud from entering our systems. The outcomes of our work relating to fraud are regularly reported to the Audit Committee, the Deputy Chief Executive and the Director of Finance. |

For each strategy, please decide whether it is going to be significantly aided by the Function.

| Public Service Excellence | Yes |
| A Fair City | Yes |
| A Prosperous City | Yes |
| A Democratic City | Yes |

2.2 **Individuals affected by the policy**

| Will the policy have an impact on service users/stakeholders? | Yes |

**Comment**
The Anti-Fraud and Corruption Policy applies to all Council Members, employees, contractors and members of the public. In general terms however this effect will be non specific being obvious only in the reduction of losses due to fraud or corruption and the investigation of these.

| Will the policy have an impact on employees? | Yes |
Comment
Fraud awareness sessions are provided to groups of staff on request and supported by an online learning tool. Provision is usually triggered by restructuring, the requirement to induct new members of staff or a specific issue being raised. More recent training involved giving advice and guidance to frontline housing staff on verifying identification of customers. Regular alerts are sent out to staff e.g. schools may be alerted if other local authorities schools have been targetted by fraudsters. In addition our fraud newsletter Fraud Spotlight published bi-annually which highlights topical issues is circulated to all directorates and council Members.

Employees actions will be judged against the Code of Conduct for Officers. Members actions will be judged against the Code of Conduct for Members. Any action taken will be in line with Council procedures.

Will the policy have an impact on wider community? Yes

Comment
Main stakeholders are the citizens of Birmingham. The Policy aims to minimise the risk of fraud occurring thus allowing resources to be fully used for service provision. Investigations will generally be undertaken by the Corporate Fraud Team, however investigations relating to Elected Members can / are also undertaken by the Monitoring Officer or External Auditors, in accordance with Council procedures. Some cases referred to the Corporate Fraud Team may also be passed to the Police to investigate and in some circumstances the cases will be referred to the Directorate to investigate. Directorate led cases are those generally involving management issues or management intervention.

2.3 Analysis on Initial Assessment

The Anti Fraud and Corruption Policy is intended to have a positive impact as it assists in ensuring that resources are not diverted from the intended purpose for fraudulent use. Zero tolerance to fraud and adherence to the Policy benefits everyone in that the reduction of fraud, corruption and error ensures further funding is available to support the delivery of services undertaken by the Council or commissioned to partner organisations.

The Policy clearly indicates that decisive action will be taken against employees or members of the public who commit or attempt to commit fraudulent or corrupt actions against the Council. In some cases this may result in civil action or criminal conviction.

Amendments made to the Policy prior to the EA being completed, removed any reference to benefit fraud investigations which since February 2015, became the responsibility of the Single Fraud Investigation Service within the Department of Work and Pensions. The removal of benefit fraud investigations from the Council's responsibility, further minimises the impact of the Policy on members of the public. It was felt that a repeat of a full equality impact assessment was unnecessary. If however, there are any further amendments that change the approach to preventing and tackling fraud and corruption the EA will be reviewed.

Should any equality issue(s) arise they will be considered.
3 **Concluding Statement on Full Assessment**

Mohan Sandhar from the Equalities, Community Safety & Cohesion Team, confirmed on 26th August 2015 that he "would reiterate the points made that it is a standard EA. This meaning there are no additions or any variations to the existing policy. As such there are no new implications for the equality duty and it should be fine to sign it off".

4 **Review Date**

01/08/18

5 **Action Plan**

There are no relevant issues, so no action plans are currently required.