

Guidance is available on [Compass](#). Completion of an EqIA should be proportional and relevant to the anticipated impact of the project on equalities. The form can be tailored to your project and should be completed before decisions are made. Key EqIAs should be reviewed by the Business Manager or Service Head, signed off by your department's Equality Action Group (EAG) and sent to the Equality and Diversity team to publish on HertsDirect. For support and advice please contact equalities@hertfordshire.gov.uk.

STEP 1: Responsibility and involvement

Title of proposal/ project/strategy/ procurement/policy	Shared Anti - Fraud Service	Head of Service or Business Manager	Helen Maneuf
Names of those involved in completing the EqIA:	Jermaine Downer Rachel Mundy Martha Goodhill	Lead officer contact details:	Helen Maneuf, Assurance Services: helen.maneuf@hert fordshire.gov.uk 55502 (01438 845502)
Date completed:	18 th November 2014	Review date:	June 2015

STEP 2: Objectives of proposal and scope of assessment – what do you want to achieve?

<p>Proposal objectives: – what you want to achieve – intended outcomes – purpose and need</p>	<p>The vision is to develop a Shared Anti-Fraud Service for Hertfordshire which will provide a robust and resilient fraud prevention, detection and investigation service to partners, working in non-benefit and corporate fraud.</p> <p>The objectives of the Shared Anti-Fraud Service are:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Create a single team to provide a fraud prevention, detection and investigation service to partners working in non-benefit and corporate fraud <input type="checkbox"/> Build a team which can: <ul style="list-style-type: none"> <input type="checkbox"/> Create resilience <input type="checkbox"/> Provide economies of scale <input type="checkbox"/> Provide for access to specialist resources <input type="checkbox"/> Share knowledge and intelligence <input type="checkbox"/> Offer opportunities for career progression <input type="checkbox"/> Develop partnership wide responses to fraud risk in areas such as business rates, council tax and housing tenancy fraud; providing capacity to address these areas <input type="checkbox"/> Develop a data analysis and data sharing service <input type="checkbox"/> Gain efficiencies in pro-active areas such as fraud policy and awareness raising work – ‘develop once; share many times’ <input type="checkbox"/> Exploit opportunities to expand coverage based on ‘invest to save’ approaches
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	<input type="checkbox"/> Work closely with the Shared Internal Audit Service, exploiting synergies between the teams
Stakeholders: Who will be affected: the public, partners, staff, service users, local Member etc	District Councils, Hertfordshire County Council, Council Tax Payers, General Public HCC Employees, District Council Employees, HCC Assurance services.

STEP 3: Available data and monitoring information

Relevant equality information For example: Community profiles / service user demographics, data and monitoring information (local and national), similar or previous EqIAs, complaints, audits or inspections, local knowledge and consultations.	What the data tell us about equalities
1. Community diversity profile data and commentary for Hertfordshire can be viewed here http://compass.hertsc.gov.uk/area/hcc/resperf/perfint/equdivhub/equdivserv/eiatoolkit/18503000/	<p>Hertfordshire has changed rapidly over the last 100 years. The population has quadrupled from 311,300 in 1911 to 1,129,100 in 2012. The population is projected to increase over the next 25 years to 1,400,700 in 2037, an increase of 24%.</p> <p>We have more children and younger people, more older people, and as a county we are increasingly ethnically diverse. In the 2011 Census, 19.2% of Hertfordshire residents identified themselves in ethnic groups other than White British, which compares to 11.23% in 2001. 26% of school aged children are from Black and Minority Ethnic (BME) backgrounds.</p>
2. Potentially impacted groups	<p>Any member of the public and/or any employee of one of the partner councils could commit fraud. Any member of the public and/or any of the partner councils could be impacted negatively by fraudulent activity. Similarly, any member of the public and/or any of the partner councils could benefit from the Shared Anti-Fraud Service's detection, investigation and prevention of fraud. As it stands therefore the potential impact on the councils' service users, communities and partners is widespread.</p> <p>The equalities issues arising from the new fraud service are most likely to be in relation to communicating with individuals being investigated, and ensuring appropriate</p>

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<p>3. HCC's Workforce Equality Profile can be viewed here.</p> <p>http://www.hertsdirect.org/your-council/hcc/resandperf/panditech/promo/workpro/</p>	<p>facilities are made available during the investigation process. In particular, the core areas of potential fraud which the new service will investigate are:</p> <ul style="list-style-type: none"> • Council Tax discounts/support fraud • Business Rates fraud • Tenancy fraud <p>This is important in case we need to consider:</p> <ul style="list-style-type: none"> • Reasonable adjustments in terms of communications individuals are sent/ access to online services/access to buildings • Providing communications in alternative languages <p>A separate "workforce" EqIA will be carried out to assess any impact on the pool of potential applicants from the district or borough councils</p>
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STEP 4: Impact Assessment – Service Users, communities and partners (where relevant)

Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigations can you propose?
Age		Consider/continue support given to elderly service users who may be vulnerable/have dementia/require accessible communications
Disability Including Learning Disability		Consider/continue reasonable adjustments given to service users who may be vulnerable/have dementia/require accessible communications/have physical or sensory disabilities or require reasonable adjustments for Learning Disabilities Ensure access to buildings and

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Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigations can you propose?
		interview rooms across all partners' sites is suitable. Provide disabled car parking spaces at each partner's sites
Race		Consider any language support required by service users being investigated by the new service. Access HCC's INTRAN service for interpreting and translation needs
Gender reassignment		Investigators will continue to follow guidelines and best practice when working with any service users who have undergone or who are undergoing gender reassignment, most notably in relation to nondisclosure requirements of Gender Recognition Certificates
Pregnancy and maternity		N/A
Religion or belief		N/A
Sex		N/A
Sexual orientation		N/A
Marriage & civil partnership		N/A
Carers (by association with any of the above)		Interview times/locations accommodate caring responsibilities wherever possible

This project is looking at merging existing fraud services across the district councils into one county -wide shared fraud service.

Diversity data on fraud investigations and their outcomes will be analysed and any appropriate initiatives put in place to ensure all service users have equal and fair access to services

Impact Assessment – Staff (where relevant)

Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigation can you propose?
Age	Possible recruitment bias. Possible career opportunity bias	HCC will apply a transparent and fair selection process. Individuals will be considered for

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Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigation can you propose?
		<p>progression through the career grades (where they apply) on the basis of merit.</p>
<p>Disability Including Learning Disability</p>	<p>Disabled staff may need specialist equipment ordered or transferred. Organisation of this and explanations to a new manager may feel embarrassing. Staff with a low level disability may find that they need to disclose personal information which they had previously kept private in order to receive the appropriate support.</p>	<p>Staff can raise any pertinent issues throughout the project's life including through FAQ's.</p> <p>HCC will apply a transparent and fair recruitment process and ensure all interview panel members have up to date training around recruitment and selection. For interviews, HCC will make reasonable adjustments or provide appropriate support as necessary in order to enable them to attend and/or take part in the selection process. Managers will adhere to HCC's guidance on interview processes.</p> <p>Reasonable adjustments will be made for staff who are successfully recruited</p> <p>New staff will also be signposted to the HCC Disabled staff network group as appropriate, so they can access an independent support network where required.</p>
<p>Race</p>	<p>Possible recruitment bias. Possible career opportunity bias</p>	<p>HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues during the project life including through FAQ's.</p> <p>New staff will also be signposted staff to the HCC BAAS staff network group as appropriate, so they can access an independent support network</p>

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Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigation can you propose?
		where required.
Gender reassignment	Staff will be invited to share any information pertinent to their application that they wish to disclose.	<p>HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues including through FAQ's.</p> <p>HCC Managers will use the Trans Policy and Guidance</p>
Pregnancy and maternity	Possible recruitment bias. Possible career opportunity bias	<p>All partners will be required to adhere to their corporate Maternity Policies in terms of keeping staff informed about job opportunities.</p> <p>HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues including through FAQ's.</p> <p>New staff who are appointed whilst they are on maternity leave will be able to use Keep In Touch days</p>
Religion or belief	Possible recruitment bias. Possible career opportunity bias	HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues including through FAQ's.
Sex	Possible recruitment bias. Possible career opportunity bias	HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues including through FAQ's.
Sexual orientation	Possible recruitment bias. Possible career opportunity bias	HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues including through FAQ's.

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Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigation can you propose?
		New staff will also be signposted to the HCC LGBT staff network group as appropriate, so they can access an independent support network where required.
Marriage & civil partnership	Possible recruitment bias. Possible career opportunity bias	HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues including through FAQ's.
Carers (by association with any of the above)	Possible recruitment bias. Possible career opportunity bias	<p>HCC Managers will ensure compliance with equalities legislation throughout the application and interview process. Staff can raise any pertinent issues including through FAQ's.</p> <p>HCC will balance requests for flexible working alongside business needs.</p> <p>New staff will also be signposted to the HCC Carers staff network, so they can access an independent support network where required.</p> <p>Consideration will be given to parking capacity in new locations for those with caring commitments who may arrive at work later than others.</p>

STEP 5: Gaps identified

<p>Gaps identified Do you need to collect more data/information or carry out consultation? (A 'How to engage' consultation guide is on Compass). How will you make sure your</p>	<p>As above</p> <p>If possible we need to obtain race and disability data on service users currently affected by the service (namely as a result of investigations and their outcomes) in order to more accurately ascertain any language support or reasonable adjustment issues</p>
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consultation is accessible to those affected?	
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STEP 6: Other impacts

Consider if your proposal has the potential (positive and negative) to impact on areas such as health and wellbeing, crime and disorder and community relations. There is more information in the guidance.

STEP 7: Conclusion of your analysis

Select one conclusion of your analysis	Give details
<input type="checkbox"/> No equality impacts identified – No change required to proposal.	
<input checked="" type="checkbox"/> Minimal equality impacts identified – Adverse impacts have been identified, but have been objectively justified (provided you do not unlawfully discriminate). – Ensure decision makers consider the cumulative effect of how a number of decisions impact on equality.	1. A special HR/Employment EQIA will be carried out for the recruitment stage of the project. 2. Specialist protocols for protected groups investigated by the shared fraud service will be developed when it is in existence.
<input type="checkbox"/> Potential equality impacts identified – Take ‘mitigating action’ to remove barriers or better advance equality. – Complete the action plan in the next section.	
<input type="checkbox"/> Major equality impacts identified – Stop and remove the policy – The adverse effects are not justified, cannot be mitigated or show unlawful discrimination. – Ensure decision makers understand the equality impact.	

STEP 8: Action plan

Issue or opportunity identified relating to: – Mitigation measures – Further research – Consultation proposal – Monitor and review	Action proposed	Officer Responsible and target date
HR/Employment	Discrete EQIA will be carried out	RM/JD – January 2015

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Issue or opportunity identified relating to: – Mitigation measures – Further research – Consultation proposal – Monitor and review	Action proposed	Officer Responsible and target date
Service users and the Equality Act	Policies/Protocol for working with service users from protected groups will be developed when the shared fraud service is established – most notably regarding: <ul style="list-style-type: none"> Language support Reasonable Adjustments for service users with disabilities Protocol for working with Trans service users 	
Monitoring trends	Obtain Diversity Profile data on service users currently affected by the service	

This EqIA has been reviewed and signed off by:

Head of Service or Business Manager:	H Maneuf	Date: 2/12/14
Equality Action Group Chair:		Date:

HCC’s Diversity Board requires the Equality team to compile a central list of EqIAs so a random sample can be quality assured. Each Equality Action Group is encouraged to keep a forward plan of key service decisions that may require an EqIA, but please can you ensure the Equality team is made aware of any EqIAs completed so we can add them to our list. (email: equalities@hertfordshire.gov.uk).

Thank you.

