

Equality & Health Impact Assessment for

Counter Fraud and Corruption Policy

(supported by Counter Fraud and Corruption Procedure)

Please note:

- The completed Equality & Health Impact Assessment (EHIA) must be
 - Included as an appendix with the cover report when the strategy, policy, plan, procedure and/or service change is submitted for approval
 - Published on the intranet and internet pages as part of the consultation (if applicable) and once agreed.
- Formal consultation must be undertaken, as required
- Appendices 1-3 must be deleted prior to submission for approval

Please answer all questions:-

1.	For service change, provide the title of the Project Outline Document or Business Case and Reference Number	Counter Fraud and Corruption Policy Counter Fraud and Corruption Procedure
2.	Name of Corporate Directorate and title of lead member of staff, including contact details	Operations and Finance Directorate Huw George, Deputy Chief Executive and Executive Director of Operations and Finance Email: Huw.George2@wales.nhs.uk Tel: 029 2010 4286

<p>3. Objectives of strategy/ policy/ plan/ procedure/ service</p>	<ul style="list-style-type: none"> • to ensure that all staff, including secondees, those with honorary contracts, Non-Executive Directors, and those working in bodies hosted by Public Health Wales practice the highest standards of conduct and behaviour • to ensure that Public Health Wales is open, transparent and honest in the way it conducts its business. • to ensure that Public Health Wales safeguards against conflict or potential conflict of interest between private interests and public duties of members of staff and our Non-Executive Directors. <p>The policy is supported by a procedure that provides a detailed framework to ensure that conflict or potential conflict of private interests and public duties of staff and Non-Executive Directors does not occur. It outlines the standards of conduct expected of all Public Health Wales staff, including Non-Executive Directors, regarding private interests as they relate and interface with public service duties.</p>
<p>4. Evidence and background information considered. For example</p> <ul style="list-style-type: none"> • population data • staff and service users data, as applicable • needs assessment • engagement and involvement findings • research • good practice guidelines 	<p>Comparisons with similar/equivalent policies in other NHS Health Boards or Trusts were made to inform the development of the Policy and the associated procedure. All Health Boards and Trusts in Wales have similar policies in place.</p> <p>This Equality Impact Assessment found that, this policy had a very limited impact on groups, communities and individuals.</p>

	<ul style="list-style-type: none"> • participant knowledge • list of stakeholders and how stakeholders have engaged in the development stages • comments from those involved in the designing and development stages <p>Population pyramids are available from Public Health Wales Observatory¹.</p>	
5.	Who will be affected by the strategy/ policy/ plan/ procedure/ service	The policy and procedure apply to all staff, including secondees, those with honorary contracts, Non-Executive Directors, and those working in or through engagement bodies hosted by Public Health Wales.

¹ <http://nww2.nphs.wales.nhs.uk:8080/PubHObservatoryProjDocs.nsf>

6. EQIA / How will the strategy, policy, plan, procedure and/or service impact on people?

Questions in this section relate to the impact on people on the basis of their 'protected characteristics'. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/mitigation	Action taken by Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
6.1 Age For most purposes, the main categories are: <ul style="list-style-type: none"> • under 18; • between 18 and 65; and • over 65 	The policy and procedure applies to all staff.	None required.	
6.2 Persons with a disability as defined in the Equality Act 2010 Those with physical impairments, learning disability, sensory loss or impairment, mental health	Positive – the policy and procedure applies to all staff. Whilst the contents of the policy and procedure do not have a negative impact on		

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conditions, long-term medical conditions such as diabetes	<p>persons with a disability, as with all written control documents there may be a negative impact due to the format of the control document that is available. Documents are published on the intranet and internet in pdf format.</p> <p>Visual impairment – not all accessibility software accepts pdf format and therefore an alternative format may be required.</p> <p><u>Learning disability</u> - The documents may also not be understood by those who</p>	<p>Public Health Wales does have provision for the production of documents that are accessible to persons with disabilities. Large print, Braille or audio versions could be provided on request.</p>	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/mitigation	Action taken by Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
	have difficulty deciphering or reading the written word, for example, dyslexia. Therefore further explanation and support may be required.	The Board Secretary/ Head of Corporate Governance is available to provide advice and assistance in applying the policy and procedure.	
6.3 People of different genders: Consider men, women, people undergoing gender reassignment NB Gender-reassignment is anyone who proposes to, starts, is going through or who has completed a process to change his or her gender with or without going through any medical	Positive – the policy and procedure applies to all staff.	None required	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/mitigation	Action taken by Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
procedures. Sometimes referred to as Trans or Transgender			
6.4 People who are married or who have a civil partner.	Positive – the policy and procedure applies to all staff.	None required.	
6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding. They are protected for 26 weeks after having a baby whether or not they are on maternity leave.	Positive – the policy and procedure applies to all staff.	None required.	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/mitigation	Action taken by Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers	Positive – the policy and procedure applies to all staff.	None required.	
6.7 People with a religion or belief or with no religion or belief. The term 'religion' includes a religious or philosophical belief	Positive – the policy and procedure applies to all staff.	None required.	
6.8 People who are attracted to other people of: <ul style="list-style-type: none"> the opposite sex (heterosexual); 	Positive – the policy and procedure applies to all staff.	None required.	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/mitigation	Action taken by Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
<ul style="list-style-type: none"> the same sex (lesbian or gay); both sexes (bisexual) 			
<p>6.9 People who communicate using the Welsh language in terms of correspondence, information leaflets, or service plans and design</p> <p>Well-being Goal – A Wales of vibrant culture and thriving Welsh language</p>	<p>Whilst the contents of the policy and procedure do not have a negative impact on persons with a disability, as with all written control documents there may be a negative impact as existing written control documents are not routinely available in Welsh language.</p> <p>The effects of the policy and procedure under consideration on the Welsh Language will need to be considered on a case by</p>	<p>This policy has been developed with due consideration of the Welsh Language Scheme. This policy may need to be reviewed in the event of Welsh Language Standards being introduced for Public Health Wales.</p>	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/mitigation	Action taken by Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
	case basis. Specifically: (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh languages no less favourably than the English language.		
6.10 People according to their income related group: Consider people on low income, economically inactive, unemployed/workless, people who are unable to work due to ill-health	Positive – the policy and procedure applies to all staff.	None required.	
6.11 People according to where they live: Consider people living in areas known to exhibit	Positive – the policy and procedure applies to all staff.	None required.	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/mitigation	Action taken by Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
poor economic and/or health indicators, people unable to access services and facilities			
6.12 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service	None identified.	None required.	

7. HIA / How will the strategy, policy, plan, procedure and/or service impact on the health and well-being of our population and help address inequalities in health?

Questions in this section relate to the impact on the overall health of individual people and on the impact on our population. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/mitigation	Action taken by Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
7.1 People being able to access the service offered: Consider access for those living in areas of deprivation and/or those experiencing health inequalities Well-being Goal - A more equal Wales	The policy and procedure are internal documents intended to provide guidance to staff. Therefore they do not have an impact on the health and wellbeing of the population or addressing inequalities in health.		
7.2 People being able to improve /maintain healthy lifestyles:	As above.	As above.	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/mitigation	Action taken by Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
<p>Consider the impact on healthy lifestyles, including healthy eating, being active, no smoking /smoking cessation, reducing the harm caused by alcohol and /or non-prescribed drugs plus access to services that support disease prevention (eg immunisation and vaccination, falls prevention). Also consider impact on access to supportive services including smoking cessation services, weight management services etc</p> <p>Well-being Goal – A healthier Wales</p>			

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/mitigation	Action taken by Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
7.3 People in terms of their income and employment status: Consider the impact on the availability and accessibility of work, paid/unpaid employment, wage levels, job security, working conditions Well-being Goal – A prosperous Wales	As above.	As above.	
7.4 People in terms of their use of the physical environment: Consider the impact on the availability and accessibility of transport, healthy food, leisure activities, green spaces; of the design of the built	As above.	As above.	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/mitigation	Action taken by Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
<p>environment on the physical and mental health of patients, staff and visitors; on air quality, exposure to pollutants; safety of neighbourhoods, exposure to crime; road safety and preventing injuries/accidents; quality and safety of play areas and open spaces</p> <p>Well-being Goal – A resilient Wales</p>			
<p>7.5 People in terms of social and community influences on their health:</p> <p>Consider the impact on family organisation and roles; social support and</p>	As above.	As above.	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/mitigation	Action taken by Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
social networks; neighbourliness and sense of belonging; social isolation; peer pressure; community identity; cultural and spiritual ethos Well-being Goal – A Wales of cohesive communities			
7.6 People in terms of macro-economic, environmental and sustainability factors: Consider the impact of government policies; gross domestic product; economic development; biological diversity; climate Well-being Goal – A globally responsible Wales	As above.	As above.	

Please answer question 8.1 following the completion of the EHIA and complete the action plan

<p>8.1 Please summarise the potential positive and/or negative impacts of the strategy, policy, plan or service</p>	<p>The contents of the policy and procedure have no disproportionate impact on the grounds of race, gender, disability, age, sexual orientation, religious belief or Welsh language.</p> <p>The Policy is applicable to all members of staff equally and is being introduced to promote an anti-fraud and corruption culture and to ensure that there are appropriate measures in place to deter, detect, prevent and investigate fraud.</p> <p>It aims to eliminate fraud and corruption within Public Health Wales as far as possible. The policy also provides a framework for responding to suspicions of fraud, together with advice and information on fraud, and the implications and outcome of counter fraud investigations.</p> <p>The Impact Assessment has found that, by introducing the revised policy and procedure, there may be a negative impact on individuals due to:</p> <p>Persons with a disability as defined in the Equality Act 2010</p> <p>Whilst the contents of the policy and procedure do not have a negative impact on persons with a disability, as with all written control documents there may be a negative impact due to the</p>
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	<p>format of the control document that is available. Documents are published on the intranet and internet in pdf format.</p> <p>Visual impairment – not all accessibility software accepts pdf format and therefore an alternative format may be required.</p> <p><u>Learning disability</u> - The documents may also not be understood by those who have difficulty deciphering or reading the written word, for example, dyslexia. Therefore further explanation and support may be required.</p> <p>People who communicate using the Welsh language in terms of correspondence, information leaflets, or service plans and design</p> <p>Existing documents have not been routinely translated into Welsh.</p> <p>The effects of the policy and procedure under consideration on the Welsh Language will need to be considered on a case by case basis. Specifically: (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh languages no less favourably than the English language.</p>
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	Action	Lead	Timescale	Action taken by Corporate Directorate
8.2 What are the key actions identified as a result of completing the EHIA?	No further action required			
8.3 Is a more comprehensive Equalities Impact Assessment or Health Impact Assessment required? This means thinking about relevance and proportionality to the Equality Act and asking: is the impact significant enough that a more formal and full consultation is required?	No – the impact of the policy is expected to be positive .	--	--	

	Action	Lead	Timescale	Action taken by Corporate Directorate
8.4 What are the next steps? Some suggestions:- <ul style="list-style-type: none"> • Decide whether the strategy, policy, plan, procedure and/or service proposal: <ul style="list-style-type: none"> ○ continues unchanged as there are no significant negative impacts ○ adjusts to account for the negative impacts ○ continues despite potential for adverse impact or missed opportunities to advance equality (set out the justifications for doing so) • Have your strategy, policy, plan, procedure and/or service proposal approved • Publish your report of this impact assessment • Monitor and review 	<p>Following consultation with the wider organization and Executive Team, present the policy and procedure to the Public Health Wales Board for approval.</p> <p>Publish and promote the new policy and procedure to all staff, providing support where necessary. This assessment will also be published.</p>	<p>Board Secretary and Head of Corporate Governance</p> <p>Corporate Governance Manager</p>	<p>January 2019</p> <p>January 2019</p>	

