

# **Merthyr Tydfil County Borough Council - Integrated Impact Assessment**

(Includes Well-being of Future Generations, Protected Characteristics, Welsh Language, Socio-economic Disadvantage, Sustainability and Biodiversity, Consultation/Engagement and Data/Evidence)



Before completing this Integrated Impact Assessment (IIA), please refer to the corresponding **guidance document**, which provides essential background information.

An IIA MUST be completed for:

- Any Council / Cabinet report.
- Any strategic decisions being taken where due regard is required to reduce inequalities of outcome resulting from socio-economic disadvantage.
- Any project (i.e. something that has a start and end date and is different from day to day business).
- Where you are implementing significant change e.g. service provision.

This IIA helps to support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation. This IIA must be completed at the start of any project or proposal.

<b>Title of Report / Project:</b>	Anti Fraud, Bribery and Corruption Policy and Draft Counter Fraud Strategy and Framework 2021/22 to 2024/25				
<b>Officer completing IIA:</b>	Mark Thomas				
<b>Lead Officer / Project Manager:</b>	Mark Thomas				
<b>Service:</b>	Regional Internal Audit Service				
<b>IIA completion date:</b>	8 <sup>th</sup> March 2022				
<b>Type of proposal: (please place an X in the relevant box)</b>	Policy	X	Strategy	X	Plan
	Practice		Restructure		Procedure
	Other (please identify):				
<b>Give a brief description of the proposal including the aims, and any links to relevant reports or documents:</b>	<p>In July 2020 Audit Wales produced a report entitled 'Raising Our Game - Tackling Fraud in Wales'. The report identified seven key themes that all public bodies needed to focus on in raising their game to tackle fraud more effectively and made 15 recommendations across the themes.</p> <p>The updated draft Anti-Fraud, Bribery &amp; Corruption Policy and new draft Counter Fraud Strategy and Framework 2021 to 2024 therefore considers this report and provides a strategy which identifies roles and responsibilities, aims and objectives, fraud risks, an action plan, and a fraud response plan flowchart</p>				

**1. Merthyr Tydfil Well-being Objectives**

**Does your proposal help to deliver any of the Council's Well-being Objectives?**

How does your proposal help to deliver any or all of the Council's Well-being Objectives?

Well-being Objectives	Does your proposal have a positive or negative impact on the Council's Well-being Objectives? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? How will you know when this has been achieved?
	Positive	Negative	Neutral		
<b>Best Start to Life -</b> Children and young people get the best start to life and are equipped with the skills they need to be successful learners and confident individuals.	X			Assisting the Council to achieve its Well-being Objectives through improved management of its financial resources assisted by its Counter Fraud arrangements.	Continued robust financial management through its Counter Fraud arrangements.
<b>Working Life -</b> People feel supported to develop the skills required to meet the needs of businesses with a developing, safe infrastructure making Merthyr Tydfil an attractive destination.	X			As above	As above
<b>Environmental Well-being -</b> Communities protect, enhance and promote our environment and countryside.	X			As above	As above
<b>Living Well -</b> People are empowered to live independently within their communities, where they feel safe and enjoy good physical and mental health.	X			As above	As above

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<b>Well-being Objectives</b>	<b>Does your proposal have a positive or negative impact on the Council's Well-being Objectives? Please place an X in the relevant box.</b>			<b>Why have you come to this decision? Please provide an explanation.</b>	<b>What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? How will you know when this has been achieved?</b>
	<b>Positive</b>	<b>Negative</b>	<b>Neutral</b>		

**Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):**

Various Counter Fraud Policies, Strategies and Framework and best practice.

## 2. Sustainable Development Principles (The Five Ways of Working)

### Does your proposal demonstrate you have met the sustainable development principles (five ways of working)?

The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how any proposals improve the social, economic, environmental and cultural well-being, whilst also looking to the future, planning for the long term and ensuring that we do not compromise the ability of future generations to meet their own needs. Please consider the national well-being goals when completing this section.

Five Ways of Working	How does your proposal demonstrate you have met the five ways of working when developing the proposal?	Are there any additional actions to be taken to better contribute to the five ways of working and/or mitigate any negative impacts? How will you know when this has been achieved?
<b>Long Term</b> - Thinking and planning for the long term, balancing short term and long term needs.	The new draft Counter Fraud Strategy and Framework 2021 to 2024 outlines the aims and objectives of the strategy, identifies fraud risks and includes a 3-year action plan which will further improve the Council's resilience to fraud, bribery and corruption. The report includes measures of success and a flow chart to demonstrate the Council's approach to a suspected fraud. Both documents have already been considered by the Corporate Management Team and Governance and Audit Committee.	The five ways of working will continue to be reviewed when the Fraud Policies are reviewed i.e. Every 2 years.
<b>Prevention</b> - Preventing problems occurring or getting worse.	As above	As above.
<b>Integration</b> - Impact on our well-being objectives, national well-being goals and the well-being objectives of other public bodies.	As above	As above.
<b>Collaboration</b> - Acting in collaboration with others inside and outside the Council.	As above	As above.
<b>Involvement</b> - Involving people with an interest in achieving the well-being goals and who reflect the diversity of our communities.	As above	As above.
<b>Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):</b> Counter Fraud Framework and related policies.		

### 3. Protected Characteristics (including Welsh Language)

**Does your proposal directly impact on service users, employees and/or the wider community, including the nine protected characteristic groups and Welsh language as identified below?**

The Public Sector Equality Duty requires the Council to have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations between different groups. Please note that an individual may have more than one protected characteristic.

Protected Characteristics	Does your proposal have a positive or negative impact on service users, employees and/or the wider community, including the nine protected characteristic groups and Welsh language? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? How will you know when this has been achieved?
	Positive	Negative	Neutral		
<b>Age</b> - People of all ages.			X	Neutral impact since the Fraud Policies are not discriminatory towards any protected characteristic.	Not applicable
<b>Disability</b> - People with disabilities/long term conditions.			X	As above	As above
<b>Gender Reassignment</b> - People whose gender identity or gender expression is different to the sex they were assigned at birth.			X	As above	As above
<b>Marriage and Civil Partnership</b> - People who are married or in a civil partnership.			X	As above	As above
<b>Pregnancy and Maternity</b> - Women who are pregnant and/or on maternity leave.			X	As above	As above
<b>Race</b> - People from black, Asian and minority ethnic communities and different racial backgrounds.			X	As above	As above

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	Positive	Negative	Neutral		
<b>Religion or Belief</b> - People with different religions and beliefs including people with no beliefs.			X	As above	As above
<b>Sex (Gender)</b> - Women and men, girls and boys and those who self-identify their gender.			X	As above	As above
<b>Sexual Orientation</b> - Lesbian, gay, bisexual, heterosexual.			X	As above	As above
<b>Welsh Language</b>					
The Welsh Language Wales Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language.					
<b>Welsh Language</b> - Opportunities for people to use and promote the Welsh language, treating the Welsh language no less favourably than the English language, compliance with Welsh Language Standards, links			X	As above	As above

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	Positive	Negative	Neutral		
with internal and external Welsh Language strategies.					

**Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):**

Not applicable.

#### 4. Socio-economic Disadvantage (Strategic Decisions)

##### Does your proposal impact/deliver better outcomes for those who are experiencing socio-economic disadvantage?

The Socio-economic Duty places a responsibility on the Council to have 'due regard' to how we can reduce inequalities of outcome caused by socio-economic disadvantage when making strategic decisions. This duty gives us an opportunity to do things differently and put tackling inequality at the heart of key decision-making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider: Single parents and vulnerable families, pensioners, carers, looked after children, single adult households, armed forces community, people with low literacy/numeracy, people who are homeless, people who have experienced the asylum system, students, people of all ages leaving a care setting, people living in the most deprived areas of Wales, people misusing substances, people involved in the criminal justice system, people who are not in education, employment or training. Please see the guidance document for more information.

Socio-economic Disadvantage	Does your proposal have a positive or negative impact on socio-economic disadvantage for service users, employees and/or the wider community? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? What steps will be taken to reduce inequalities of outcome? How will you know when this has been achieved?
	Positive	Negative	Neutral		
<b>Low Income/Income Poverty</b> - Unable to afford to maintain regular payments such as bills, food, clothing, transport, other essential items etc.	X			Improved management of its financial resources assisted by its Counter Fraud arrangements will help ensure only those eligible to claim support do so and ultimately ensure reduced bills for all residents. The policy and framework will raise awareness of fraudulent activities and provide service users/employees and the wider communities guidance on how to report fraudulent activities.	
<b>Low and/or No Wealth</b> - Enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future.	X			As above	

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Please consider: Single parents and vulnerable families, pensioners, carers, looked after children, single adult households, armed forces community, people with low literacy/numeracy, people who are homeless, people who have experienced the asylum system, students, people of all ages leaving a care setting, people living in the most deprived areas of Wales, people misusing substances, people involved in the criminal justice system, people who are not in education, employment or training. Please see the guidance document for more information.

Socio-economic Disadvantage	Does your proposal have a positive or negative impact on socio-economic disadvantage for service users, employees and/or the wider community? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? What steps will be taken to reduce inequalities of outcome? How will you know when this has been achieved?
	Positive	Negative	Neutral		
<b>Material Deprivation</b> - Unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies etc.	X			As above	
<b>Area Deprivation</b> - Where you live e.g. rural areas, and where you work e.g. accessibility of public transport.	X			As above	
<b>Socio-economic Background</b> - Social class i.e. parents' education, employment and income.	X			As above	
<b>Socio-economic Disadvantage</b> - What	X			As above	

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Please consider: Single parents and vulnerable families, pensioners, carers, looked after children, single adult households, armed forces community, people with low literacy/numeracy, people who are homeless, people who have experienced the asylum system, students, people of all ages leaving a care setting, people living in the most deprived areas of Wales, people misusing substances, people involved in the criminal justice system, people who are not in education, employment or training. Please see the guidance document for more information.

Socio-economic Disadvantage	Does your proposal have a positive or negative impact on socio-economic disadvantage for service users, employees and/or the wider community? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? What steps will be taken to reduce inequalities of outcome? How will you know when this has been achieved?
	Positive	Negative	Neutral		
cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged?					

##### Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):

Fraud policies, strategies and framework.

## 5. Consultation and Engagement

### What consultation and/or engagement has been undertaken to inform the development of the proposal?

There may be a legal requirement to consult in some instances, or a legitimate expectation that consultation will take place. Where it has been determined that consultation is required, the Gunning Principles must be adhered to.

- The proposals are still at a formative stage.
- There is sufficient information to give 'intelligent consideration'.
- There is adequate time for consideration and response.
- 'Conscientious consideration' must be given to the consultation responses before a decision is made.

Please consider: Protected Characteristic groups, those who are experiencing socio-economic disadvantage, communities and places of interest, other stakeholders, forums, community groups and community councils. Please see the guidance document for more information.

Consultation and Engagement	Has consultation and/or engagement been undertaken on the proposal? Please place an X in the relevant box.			Briefly describe any recent or planned consultation and/or engagement exercises, paying particular attention to evidencing the Gunning Principles. Please identify when the consultation and/or engagement took place or will take place, or why it is not required.	Who was consulted/engaged with? Was sufficient information provided to allow an informed decision on the proposal to be made? What were the key findings of the consultation and/or engagement? Have these findings been taken into account? Is further consultation and/or engagement required?
	Undertaken	Due to be undertaken	Not required		
Requirement for consultation and/or engagement to be undertaken, or a legitimate expectation that it will take place.			X	Not applicable	Not applicable

### Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):

Not applicable.

## 6. Data and Evidence

### What data or other evidence has been used to inform the development of the proposal?

Evidence may include the outcome of previous consultation or engagement exercises, existing databases, pilot projects, review of customer complaints and compliments and other service user feedback, national and regional data, academic publications and reports, future trends, horizon scanning, business plans etc. Consider the sources of evidence from all of the sections in your explanation.

Data and Evidence	Has data and evidence been used in order to inform the proposal? Please place an X in the relevant box.		What data or other evidence has been used to inform the development of the proposal? What have been the key findings of this data and evidence? Has this data and evidence helped to inform the proposal?	How has the data and evidence helped to inform the proposal? If the data and evidence did not support the proposal, why was this? Have there been any gaps identified? If so, what steps will be taken to cover the identified gaps?
	Yes	No		
Data and evidence used in order to inform the proposal.	X		Audit Wales 'Raising our Game - Tackling Fraud in Wales'.  Existing Counter Fraud policies.	The report identified seven key themes that all public bodies needed to focus on in raising their game to tackle fraud more effectively and made 15 recommendations across the themes.

### Sources of evidence to support the above:

Audit Wales 'Raising our Game - Tackling Fraud in Wales'.

Existing and best practice Counter Fraud policies.

**7. Biodiversity and resilience of Ecosystems**

**How does your proposal impact on Biodiversity and therefore the resilience of Ecosystems?**

Under Section 6 of the Environment (Wales) Act 2016 we must seek to maintain and enhance Biodiversity within the proper exercise of our functions. In doing so, we must also seek to promote the resilience of Ecosystems.

Biodiversity and resilience of Ecosystems	What is the expected impact on Biodiversity? Please place an X in the relevant box.				Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to the maintenance and enhancement of Biodiversity? How do you know when this has been achieved?
	Maintained	Enhanced	Reduced	Neutral		
To maintain and enhance Biodiversity (and therefore promote the resilience of Ecosystems).				X	Not applicable	Not applicable

**Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):**

Not applicable

## 8. Summary

As a result of completing this IIA, please identify below;

- The number of positive, negative or neutral scores for the Council's Well-being objectives, the sustainable development principles, protected characteristics including Welsh Language and Socio-economic disadvantage.
- If consultation and/or engagement has been undertaken, is due to take place or is not required.
- If data and evidence has been used in order to inform the proposal.
- If the proposal maintains, enhances or reduces the resilience of ecosystems.

The table below should then be included in the related Council/Cabinet report.

	Positive Impacts	Negative Impacts	Neutral/Not Applicable
<b>1. Merthyr Tydfil Well-being Objectives</b>	4 of 4	0 of 4	0 of 4
<b>2. Sustainable Development Principles - How have you considered the five ways of working?</b> <ul style="list-style-type: none"> <li>• Long term</li> <li>• Prevention</li> <li>• Integration</li> <li>• Collaboration</li> <li>• Involvement</li> </ul>	5 of 5	0 of 5	0 of 5
<b>3. Protected Characteristics</b> (including Welsh Language)	0 of 10	0 of 10	10 of 10
<b>4. Socio-economic Disadvantage</b>	6 of 6	0 of 6	0 of 6
<b>5. Consultation and Engagement</b>	<b>Undertaken</b>	<b>Due to be Undertaken</b>	<b>Not Required</b>
	0 of 1	0 of 1	1 of 1
<b>6. Data and Evidence to inform the proposal</b>	<b>Yes</b>		<b>No</b>
	1 of 1		0 of 1
<b>7. Biodiversity and the resilience of Ecosystems</b>	<b>Maintained</b>	<b>Enhanced</b>	<b>Reduced</b>
	0 of 1	0 of 1	0 of 1
			<b>Neutral/Not Applicable</b>
			1 of 1

### Summary

**The main positive impacts are:**

The main positive impacts are that the Anti-Fraud, Bribery and Corruption Policy and Counter Fraud Strategy and Framework 2021 to 2024 supports the Council to achieve its Well-being Objectives through improved management of its financial resources assisted by its Counter Fraud arrangements.

**The main negative impacts are:**

None identified.

**9. Actions**

**Based on the summary of your positive and negative impacts identified in the Summary section above, will you need to make changes to your proposal to better contribute to positive impacts and/or mitigate any negative impacts?**

Please identify any further actions you will need to undertake to better inform this proposal e.g. whether further consultation is required or more data and evidence is required to better inform the proposal.

<b>What are you going to do?</b>	<b>Estimated completion date</b>	<b>Who will be responsible?</b>	<b>Timelines/Milestones e.g. 6 months/over a year, etc.</b>	<b>Progress</b>
Continue to review the Counter Fraud strategies, policies and framework.	Action Plan in place and being monitored. Strategy - Annually Policy every 2 years.	Chief Finance Officer with Head of Regional Internal Audit Service.	Action Plan in place and being monitored.	

**10. Version Control**

**The IIA should be used at the earliest stages of the development of the proposal and decision making process, and then honed and refined throughout to strengthen and shape the proposal. This section will act as an audit trail to evidence how the IIA has been developed over time.**

Please use the table below to keep a record of this process so that we can demonstrate how we have delivered the sustainable development principles.

<b>Version No.</b>	<b>Decision making stage</b>	<b>Date considered</b>	<b>Brief description of any amendments made following consideration</b>
1	Council	30 March 2022	

<b>11. <u>Monitoring and Review</u></b>	
<b>The implementation and the impact of the proposal should be monitored and reviewed throughout the development of the proposal.</b> Please identify how the proposal will be monitored and reviewed as it progresses, including the implementation of any amendments identified.	
<b>How will the implementation and the impact of the proposal and any amendments be monitored?</b>	Monitoring Delivery of Strategy Action Plan and performance by Senior Officers and Governance & Audit Committee.
<b>When will the proposal be reviewed? How frequently will this take place?</b>	Quarterly with formal Annual reviews.
<b>Who is responsible for monitoring and reviewing the proposal?</b>	Chief Finance Officer & Head of Regional Internal Audit Service.

<b>12. <u>IIA Approval</u></b>					
<b>IIA Approved by:</b>	C.Mark Thomas	<b>Job Title:</b>	Head of Regional Internal Audit Service	<b>IIA Approval date:</b>	15 March 2022