

# Integrated Impact Assessment Form

Promoting Equality, Human Rights and Sustainability

<b>Title of Policy/ Proposal</b>	Revised Counter Fraud Policy and Strategy
<b>Completion Date</b>	26 June 2020
<b>Completed by</b>	Jill Stacey, Chief Internal Auditor
<b>Lead officer</b>	Jill Stacey, Chief Internal Auditor

**Type of Initiative:**

Policy and Strategy

Review and update

**1. Briefly describe the policy/proposal you are assessing.**

Set out a clear understanding of the purpose of the policy being developed or reviewed (e.g. objectives, aims) including the context within which it will operate.

A refresh of the Management arrangements for tackling fraud including revised Counter Fraud Policy Statement and Counter Fraud Strategy.  
A focus on enhancing fraud prevention and detection to improve Midlothian Council's resilience to the risk of fraud, theft, corruption and crime, and ensure these are embedded preventative practices are specific changes associated with the proposed Counter Fraud Strategy.

**What will change as a result of this policy?**

Enhancements to internal Management arrangements including:

- a) The formal establishment of an Integrity Group with a Terms of Reference (approved by the Audit Committee on 22 June 2020) shifting to more holistic working in multi-disciplinary forums to tackle fraud in a consistent and collaborative way across the Council;
- (b) A focus on enhancing fraud prevention and detection to improve Midlothian Council's resilience to the risk of fraud, theft corruption and crime, and ensure these are embedded preventative practices;
- (c) Applying the minimum standard within the CIPFA Code of Practice on 'Managing the Risk of Fraud and Corruption (2014)' for counter fraud policy, strategy and other practices, and adopting the CIPFA Counter Fraud Maturity Model as a means of self-assessment moving forward will enable continuous improvement to be evaluated, managed and evidenced; and
- (d) Use of a blend of toolkits such as fraud vulnerability

No change to the Whistleblowing external-facing arrangements.

## 2. Do I need to undertake a Combined Impact Assessment?

<b>High Relevance</b>	No
The policy/ proposal has consequences for or affects people	Internal staff only – minimal impact
The policy/proposal has potential to make a significant impact on equality	
The policy/ proposal has the potential to make a significant impact on the economy and the delivery of economic outcomes	
The policy/proposal is likely to have a significant environmental impact	
<b>Low Relevance</b>	Yes
The policy/proposal has little relevance to equality	
The policy/proposal has negligible impact on the economy	
The policy/proposal has no/ minimal impact on the environment	
<p><b>If you have identified low relevance please give a brief description of your reasoning here and send it to your Head of Service to record.</b></p> <p>The revised Counter Fraud Policy and Strategy set out enhancements to internal Management arrangements though anticipate there will be minimal impact on internal staff only; there is no change to the Whistleblowing external-facing arrangements.</p> <p><b>If you have answered yes to high relevance above, please proceed to complete the Integrated Impact Assessment.</b></p>	