

Stage 1: Scope of the Equality Impact Assessment

1. What is being assessed? (Title or description of the policy, strategy, service, function)
And who implements this policy, strategy, service or function?

The Internal Audit Service (excluding Fraud and Investigations Team)
The Internal Audit Team consists of internal resources, contractors via a partnership with Deloitte and further resources from Bucks County Councils' Internal Audit and Assurance Team.

2. What is the purpose? (A short statement about its aim or objectives)

The purpose of IA is to provide an independent opinion as to control framework introduced and managed by Management in order to protect WDC assets.

On an annual basis officers from the IA service (internal) sign a declaration that they will comply with CIPFA standards. CIPFA – Chartered Institute Public Finance and Accountancy (copy attached) Appendix 1
In the future this will be widened to cover any external resources used in the delivery of internal audit services at WDC.

3. Who is affected? (The people it covers)

All officers involved in the delivery of IA services

4. Are there any other organisations involved in delivery? (Other agencies, Voluntary sector)

Yes private provider - Deloitte and BCC Internal Audit and Assurance Team

5. What are the external drivers for change? (i.e. Legal, National Policy, Partnership, etc)

Pathfinder Support Services - as at March 2009 IA are not part of the Support Service strand, however IA continues to work in partnership with AVDC, Deloitte and BCC

6. Does the service affect the public or staff directly?

Yes - some elements of IA work i.e investigations/ allegations does have an affect on both the public in dealing with the allegation in a transparent and open way and the staff who may be the subject matter of the allegation. To this end a detailed investigation protocol and supplementary documents has been introduced. Copy of Internal Investigations Protocol is attached - see Appendix 2
Interview process – due regard is given to the interview process as regards members of the public to ensure that any issues e.g. regarding language, age of person being interviewed and culture. These are dealt with at the start of the process e.g. offer of an interpreter where

English is not the first language spoken, timings and visits to a private address where elderly or single females are present, the use of a “friend” as part of the interviewing process.

NB it should be stated that over the last two years the above process has been followed and we have not received any complaints as regards the way in which interviews are undertaken, this would have been noticed upon completion of the interview whether the “friend” has the opportunity to comment on the way in which the interview had been handled. A brief explanation of the investigations protocol is also provided which outlines the reason for the interview and the process that will be followed; This is an internal document and is not made available for public use hence it is not produced in different languages.

7. Does it affect how other services are provided?

No if an Internal Audit report (from the Annual Plan) or a formal investigation has highlighted that the control framework within the Service area is not sufficiently robust and has put the Councils assets at risk – assets being people, property, fixtures and fittings and its reputation then it is up to the Service Manager to implement the agreed action plan. Reporting mechanism is via SMB and ultimately the Audit Committee if the recommendations contained in the Action Plan are not implemented within agreed timescales.

We will also liaise with the relevant Head of Service and HR if an investigation has revealed any training issues as regards staff conduct e.g. customer care which covers equality awareness.

8. Is there information e.g. survey data or complaints that suggest that it is affecting particular groups of people?

No survey data is collected as IA is not directly responsible for delivering the service under review. The audit report would highlight to Management any deficiencies as regards the internal control framework in place.

9. Does it have employment implications?

No. All new staff will attend equalities training as part of their induction process.

If you have answered ‘yes’ to one or more of questions 6,7,8 or 9 you will need to carry out a full Equality Impact Assessment.

10. Using the assessment in Questions 6-9 above, should a full assessment be carried out?

No - as the fieldwork element of IA does not require samples to be selected based on any of the equalities strands nor is the data sources from it selects its samples structured in this way.

Statistical sampling techniques can be used however the additional effort in terms of time & £ to enable this to be demonstrated cannot be justified.

11. What is the justification for the decision about full assessment?

The work if the IA service does not differentiate based on any of the equalities strands. Any samples used in testing are representative of the total sample population and not pre selected

based on demographic/social profile.

If the answer to Q10 is 'yes' stage 4 of the assessment must be completed within 3 months.

12. Who undertook this assessment?

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Please send this form to your Equality Champion (See Corporate, Equality and Young People on WySpace for a current list) and copy it to Claire Hook, Equalities Officer at claire_hook@wycombe.gov.uk. You must do this before final sign off by the Head of Service to enable the challenge process to be applied effectively.

The following Head of Service approved this preliminary impact assessment:

Name:

Date:

INTERNAL INVESTIGATION PROTOCOL

1. Introduction

- 1.1 This protocol has been written to ensure that a standardised process, wherever possible is followed whenever Internal Audit perform an investigation into either an employee or a Member of the Council.
- 1.2 Any deviations from this protocol whilst conducting an investigation must be noted on file. If appropriate any deviations must be authorised by an appropriate officer, e.g. Head of Financial Services or a Corporate Director.
- 1.3 The protocol is designed to ensure that there is open and clear communication of expectations during an investigation by the main parties involved. Namely:
 - Internal Audit
 - Human Resources
 - Relevant Line Management
 - Officers involved
- 1.4 This protocol does not affect the authority granted to Internal Auditors under section 4.3 of Financial Regulations to:
 - (a) access to all authority premises at all times
 - (b) access to all assets, records, documents, correspondence and control systems
 - (c) receive any information and explanation considered necessary concerning any matter under consideration
 - (d) require any employee of the authority to account for cash, stores or any other authority assets under his/her control
 - (e) access records belongings to third parties, such as contractors, when required
 - (f) directly access the Head of Paid Service, the Cabinet and Audit Committee

2. Stages of the Investigation

Stage 1

There must be just cause for the investigation to commence. The source of the allegation must be clearly documented (completion of Authority to Investigate form) and held on file.

NB Anonymous complaints/allegations/incidences will only be investigated if there is sufficient information on which to begin an investigation. The aim being to avoid malicious and vexatious complaints and allegations. Confirmation of this decision will be issued to all relevant parties.

Stage 2

A special investigation form should be completed detailing the background to the investigation. Head of Financial Services (or a Corporate Director in the absence of) shall sign this form as evidence of authorisation to investigate.

Where the matter to be investigated is deemed particularly sensitive then the Head of Financial Services may request a Corporate Director to authorise the investigation in the first instance.

In the event that the investigation is in respect of either an officer senior to the Head of Financial Services or a Member of the Council then the investigation is to be authorised by an appropriate Corporate Director, the Chief Executive or the Leader of the Council. **NO WORK IS TO BE UNDERTAKEN UNTIL SUCH TIME AS THE INVESTIGATION IS AUTHORISED.**

Note: In the event that the work to be undertaken will include the review of either internet logs and/or email databases an authorised request (usually by the Head of Financial Service or the Corporate Director must be submitted to Northgate along with the request for the log(s) and database(s).

Stage 3

Conduct of the investigation

- Staff interviewed will be informed that it is an exploratory interview not a disciplinary hearing. Staff should be made aware that any statement, minutes of meetings etc could be used in a disciplinary hearing should one be necessary. (Anonymity may be possible if there is a genuine and real fear of reprisal).
- Where possible interviewees will be given the opportunity to have a colleague or union representative present if they wish.
- Where a formal statement is required, it will be dated, signed and given to the interviewee for comment. Any points of disagreement will be noted.
- Where audit is investigating a specific allegation on behalf of a manager the scope, roles and format of investigation, will be agreed at outset of the investigation and Internal Audit will liaise with the manager/HR during the course of the investigation and before finalising the report. The final report will include appropriate appendices i.e. any supporting documentation such as witness statements, case notes, protocols etc.

- Where allegations against individuals arise from a general investigation witnesses will be informed where practicably possible that their statements may be used in any related investigation or disciplinary hearing.

The front cover of the report and the introduction should clearly specify the allegation being made.

Stage 4

Prior to the distribution of report, seek Human Resource comments regarding content and legality matters. If it is thought necessary also seek the comments of the Principal Solicitor/Information Officer.

Stage 5

Distribute report to relevant manager(s).

Stage 6

The Manager is to inform Internal Audit, in writing, of their decision regarding the report i.e. to conduct a formal disciplinary hearing or not.

Stage 7

Where a disciplinary hearing is to be pursued, Human Resources to copy to Internal Audit all correspondence sent to the employee outlining the allegations to be answered at the disciplinary hearing.

Stage 8

Internal Audit may attend disciplinary hearing and present evidence (if required) and answer questions on the report.

Stage 9

Human Resources to formally, in writing, inform Internal Audit of the result of the hearing. Once this is received the case file will be signed off and closed.

Stage 10

Internal Audit to update the Corporate Director as to the result of the hearing, however, Corporate Director is not to receive details as this may affect the appeal process.