

**Swindon Borough Council and NHS Swindon
Diversity Impact Assessment for the deletion of the Commercial Fraud post**

1 What's it about? Refer to equality groups

What is it there for? What is it set up to deliver? What is the proposed change?
 This post focuses on doorstep crime and financial investigations in particular Proceeds of Crime. The post provided a proactive patrol intercepting rogue traders who prey on vulnerable residents and illegal immigrants selling counterfeit goods (mainly CDs) round industrial estates. The proactive patrols were mainly intended to disrupt rogue trader activity. To mitigate the loss of this post, we will conduct quarterly rogue trader days with the police and promote 'Buy with Confidence'. 'Buy with Confidence' provides consumers with a list of reputable traders who have been vetted and approved by Trading Standards. No further work will be conducted on the selling of counterfeit goods in trading estates (no new intelligence has been received to suggest that this is still a problem). The regional enforcement team Scambusters will take on the majority of rogue trader cases as they tend to be regional crimes. Financial investigation work was going to be continued in house by training another member of staff, but this has not proved to be possible, so Financial Investigation work will be out sourced to other local authorities. This will mean that the Authority will only benefit from half of the potential income from Proceeds of Crime. We have done a lot of work to tackle rogue traders from a starting point four years ago. We have introduced 'No cold calling' Zones to deter rogue traders, established joint working with the police, educated banks to look out for vulnerable people withdrawing large sums of cash, used the regional 'Scamwise' educational information. The Commercial Fraud officer has spent time proactively intercepting all home improvement businesses and we had some good successes at driving out some of our rogue traders, by mainly interrupting their activities and getting the rogue traders arrested. We will still provide education using 'Scamwise' materials and through 'Weeks of Action'. We now provide a quarterly rogue trader sweep which is the proactive enforcement as well as a reactive instant response where we get a report of a rogue trader operating in Swindon Borough.

What potential is there to meet the equality duties?
 The deletion of this post may lead to vulnerable members of society becoming more likely to victims to rogue traders. We know that the most likely victims of rogue traders are elderly people living on their own. We have put measures in place detailed above to help mitigate the impact.

What equality benefits does it create?
 None

What are the barriers to meeting this potential?
 None

2 Who's it for? Refer to equality groups

Who is expected to benefit or use the service (internal/external)?
 All elements of the community, but mainly elderly people living on their own

What do you know about them (evidence)?
 Our services impacts on all elements of the community, from detailed research and experience across the country by ourselves, other Trading Standards services and partner agencies, we understand who our vulnerable people are. From this evidence we know that our vulnerable groups are elderly people living on their own and to a lesser extent those isolated from society either through mental and physical health, language barriers and dependency on alcohol.

Who is missing or may find it difficult to use the service?
 We believe that some ethnic groups are reluctant to contact our service and prefer to resolve matters for themselves. We expect that 'Buy with confidence' will be a better way to engage with these groups and this proactive, self-protection option will be more appealing and offer better protection for these groups

Do you know why?
 We believe it is culturally the way these group choice to resolve matters

3 Impact Refer to dimensions of equality

How will these services be successfully delivered to a diverse group of people? (positive impact) Promoting a proactive, self-protection solution is preferable to dealing with the matter after they have become victims. We do recognise that this will have a detrimental impact on some vulnerable groups but that the measures I have described in section 1 will mitigate this negative impact.
Is there any innovative thinking, working or technology that could improve delivery? Yes, the promotion of 'Buy With Confidence' will provide a proactive, self-protection which will be more affective at driving out rogue traders than enforcement action will have.
Is there anything about the way you deliver your service, which may stop people getting involved? (negative impact) Yes the removal of the post will have a detrimental impact on vulnerable groups accessing our services as they will not be able to benefit from the proactive intervention that we had. However, through initiatives such as 'Buy with Confidence' and scamwise we believe that there will be greater opportunity for everyone to access preventative measures that people can use to protect themselves from Rogue Traders
Is that reasonable? How can it be justified? How can it be resolved? The deletion of the post has been done in response to resource constraints. We believe that we have mitigated the impact as much as possible.
What consultation has taken place? How has the consultation influenced the service? Consultation will take place through the budget process

4 So what?	Link to business planning process
What changes have you identified? As described in section 1.	
What will you do now and what will be included in future planning? We intend to work more closely with colleagues across Wiltshire and the old Avon authorities to see what services we can better share.	
When will this be reviewed? This will be reviewed during the a year after implementation	
How will success be measured? That we are satisfied that our services are still being applied consistently and that people are able to access our services. We will continue to monitor who accesses our services and liaise with our police colleagues to share any information they gather.	

For the record
Name of person leading this DIA – Phil Thomas
Names of people involved in consideration of impact As above
Date Completed 23.10.2011
Name of director signing DIA Phil Thomas
Date DIA signed 23.10.2011
Date approved by corporate group.