

**Equality Impact Assessment
Level One
Initial Screening**

Service Area: AUDIT & INVESTIGATIONS

Title of policy, procedure, strategy, function or working practice:

Anti-Money Laundering & Proceeds of Crime Policy

1. What are the aims, objectives and intended outcomes of the proposed policy, procedure, strategy, function or working practice to be assessed?

This is an existing policy which is a mandatory requirement for the Council in accordance with the Anti-Money Laundering Regulations 2007 and Proceeds of Crime Act 2002 and the Terrorism Act 2000. This Policy is also considered as part of the Council's Use of Resources inspection and the wider Governance Framework for the Council.

The key aims and objectives of the policy are:-

- i.) to comply with the law relating to Money Laundering and to help employees and elected members to also comply with the law by following the policy;
- ii.) to maintain high financial standards across the Council;
- iii.) to promote a high level of accountability and transparency;
- iv.) to observe all relevant codes of conduct relating to money laundering; and
- v.) to ensure that the Council's reputation and financial integrity is maintained by following the steps laid down in the policy.

2. Who is intended to benefit from the policy, procedure, strategy, function or working practice and in what way? Think about who will benefit and how. This will prompt thoughts on who will not benefit and whether this can be justified.

The following benefit from the policy:-

- i.) General Public – By knowing that the Council is open, honest and fair and does not hide or shirk its responsibilities in dealing with those involved in money laundering activity or dealing with the proceeds of crime.
- ii.) Employees – The policy protects the Council's employees by enabling them to comply with the law as there are serious possible penalties for a breach of the policy ranging from disciplinary action to imprisonment if the employee has acted outside the law. The policy clearly shows what steps protect the employee.
- iii.) Members – As with employees, the policy enables Members to comply with the law as there Members could have to answer to Standards Committee or the Standards Board for England to justify their actions but as with employees a Member could face imprisonment if they act outside the law, and the policy gives clear guidance how to avoid this.
- iv.) Partners – Reinforces the Council's aims as being a fair, honest and

open authority that will not shirk its responsibility to deal with an issue.

The policy shows what steps will be taken and has appointed a Money Laundering Reporting Officer (MLRO) and 2 deputy MLROs to report any incidents to the Serious Organised Crime Agency (SOCA).

It should be noted that if no suspicious activity occurs that requires reporting, then this policy never comes into effect i.e. some activity must be suspected for the policy to be followed.

The same evaluation / reporting process takes place irrespective of what equality group the suspect individual(s) may fall into. Failure to do so would almost certainly result in serious criminal proceedings being taken against the employee or Member under the Acts of Law this policy covers.

3. Is there any evidence of impact on people on the grounds of Race, Religion, Gender, Disability, Sexual orientation and age as a result of this policy, procedure, strategy, function or working practice. If there is positive or negative impact then please indicate the levels.

a. Race

Impact : Positive	<input type="checkbox"/>	Negative	<input type="checkbox"/>	Neutral	<input type="checkbox"/>
Level : High	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Low	<input type="checkbox"/>

b. Religion

Impact : Positive	<input type="checkbox"/>	Negative	<input type="checkbox"/>	Neutral	<input type="checkbox"/>
Level : High	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Low	<input type="checkbox"/>

c. Gender

Impact : Positive	<input type="checkbox"/>	Negative	<input type="checkbox"/>	Neutral	<input type="checkbox"/>
Level : High	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Low	<input type="checkbox"/>

d. Disability

Impact : Positive	<input type="checkbox"/>	Negative	<input type="checkbox"/>	Neutral	<input type="checkbox"/>
Level : High	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Low	<input type="checkbox"/>

e. Sexual Orientation

Impact : Positive	<input type="checkbox"/>	Negative	<input type="checkbox"/>	Neutral	<input type="checkbox"/>
Level : High	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Low	<input type="checkbox"/>

f. Age

Impact : Positive	<input type="checkbox"/>	Negative	<input type="checkbox"/>	Neutral	<input type="checkbox"/>
Level : High	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Low	<input type="checkbox"/>

4. Has any positive/negative impacts been identified which cannot be justified?	
YES	Need to proceed to stage 2 or 3 (go to question 5)
NO	No need to proceed to stage 2 or 3 (go to question 7)
5. Should the policy procedure proceed to stage 2 Partial impact assessment or stage 3 Full Impact Assessment?	
STAGE 2 <input type="checkbox"/>	STAGE 3 <input type="checkbox"/>
6. What dates will the stage 2 or stage 3 impacts Assessment be completed by?	
7. Has this Initial Screening been sent to the HR department to be uploaded on the internet?	
YES <input type="checkbox"/>	NO <input type="checkbox"/>
8. (HR Policies Only) Is the Policy consistent with employment Codes of Practice on Race, Gender and Disability? If not what else needs to be included	
n/a	

Name Mark Beard Service Audit & Investigations

Signed Dated 28th January 2009

Service Manager Signature

Approved by Departmental Equalities Representative.

Signed Date