

Equality Impact Assessment Corporate Service Improvement Tool

ANNEX 1

Details of the assessment

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|---|---|
| Name of Function/Policy/ Service being assessed: | Anti Money Laundering Policy |
| Is the activity...? | New NO (please go to step 1) Existing: Yes (please go to step 2) |
| Date of assessment | 30 December 2010 |
| Directorate & Service | Financial Services – Exchequer |
| Policy Owner | Council |
| Lead Officer | Brian Courtney |

| | Key Questions | Answers/Notes |
|---------------|---|---|
| Step 2 | Scoping the assessment | |
| 1. | What is the overall aim, or purpose of the function/ policy/service? | To encourage prevention, promote detection and support investigation of money laundering. |
| 2. | What outcomes do you want to achieve with this function/ policy/service and for whom? | To provide an understanding of money laundering as an illegal activity and to achieve a consistent approach to dealing with money laundering issues for all Council employees. |
| 3. | Who is intended to benefit from the function/service/ policy? | All staff and elected Members. |
| 4. | Who defines or defined the function/service/policy? | The Policy is written by the Director of Finance, reviewed by Audit Committee, Policy Overview Committee and Cabinet and then endorsed by Council. |
| 5. | Who implements the function/service/policy? | The Policy provides stakeholders with guidance that the Council expects to be followed. Implementation of the Policy is the responsibility of the Money Laundering Reporting Officer. |
| 6. | How do the outcomes of the function/service/policy meet or | Please indicate which Sustainable Community Strategy (SCS) priority these outcomes relate to: |

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| | Key Questions | Answers/Notes | |
|---------------|---|--|----|
| | conflict other policies, values or objectives of the public authority (if applicable)? | Safer place | NO |
| | | Cleaner, smarter borough | NO |
| | | Improving health & reducing inequalities | NO |
| | | Protecting & enhancing the environment | NO |
| | | Good local transport | NO |
| | | Strong economy & decent housing | NO |
| | | Any other comments: | |
| 7. | Are there any factors that could contribute or detract from the outcomes identified earlier? | Lack of staff awareness of the Policy and its accompanying Guidance Notes. Details of the Policy will be circulated to all staff on an annual basis. | |
| Step 3 | Consideration of data and information | | |
| 8. | What do you already know about who uses this function/service/ policy? | The Policy has been in place for several years and details are published on the Council website. | |
| 9. | Has any consultation with service users already taken place on the function/service/ policy and if so what were the key findings? | No. | |
| 10. | What, if any, additional information is needed to assess the impact of the function/service/policy? | None | |
| 11. | How do you propose to gather the additional information? | N/A | |

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| | Key Questions | Answers/Notes |
|---------------|--|--|
| Step 4 | Assessing the Impact | |
| 12. | Based on what information you already know, in relation to each of the following groups consider whether a) there is anything in the function/service/policy that could discriminate or put anyone at a disadvantage b) for an existing function/service/policy, how it is actually working in practice for each group | |
| a. | Equality groups | Age |
| b. | | Disability |
| c. | | Gender |
| d. | | Race |
| e. | | Religion/Belief |
| f. | | Sexual Orientation |
| g. | | General/other |
| Step 5 | Reviewing and Scrutinising the Impact | |
| 13. | Have you identified any differential impact and does this adversely or positively affect any groups in the community? | No |
| 14. | Can we make any changes or improvements? | The Policy will be reviewed annually and as and when legislative changes are made. |
| 15. | If there is nothing you can do, can the reasons be fairly justified? | N/A |
| 16. | Do any of the changes in relation to the adverse impact have a further adverse affect on any other group? | N/A |

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| Step 5 continued... | | Actions to be inserted into Equality Action Plans | | | |
|---|---|---|--|---------------------|---------------------|
| Based on your answers in Step 5, please finalise your actions here. These actions will then be incorporated into our equality action plans. | | | | | |
| Equality Strand | Related SCS (or other) Priority | Action | Outcome/monitoring information and targets | Date for Completion | Responsible Officer |
| If an adverse impact was found or unmet needs identified, which actions will you put in place to address this: | | | | | |
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| If the impact is still unclear, list the actions you will put in place to gather the information you need: | | | | | |
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| If you did not find any evidence of unmet needs or adverse impact, list the actions you will put in place to maintain good practice: | | | | | |
| 1 | The Policy will be reviewed annually and additional information will be provided to appropriate officers. | | All instances of money laundering activity will be reported to Members | | Director of Finance |
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| Step 6 Decision making and future monitoring | | |
| 17. | Which decision making process do these changes need to go through i.e. do they need to be approved by a committee/Council? | Proposed changes to the Policy are reported to the Audit Committee, Policy Overview Committee, Cabinet and Council. |
| 18. | How will you continue to monitor the impact of the function/service/ policy on diverse groups? | Any issues raised will be reported to Members for consideration. |
| 19. | When will you review this equality impact assessment? | This will be reviewed in conjunction with the annual review of the Policy document. |
| Final steps | | |
| For an existing function/service/policy: Send your assessment to the West Kent Equalities Officer | | |
| For a new function/service/ policy: Summarise your findings in the committee report. Ensure planned consultations address the findings of this impact assessment. | | |