

## Equality Impact Assessment Corporate Service Improvement Tool

ANNEX 1

### Details of the assessment

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

	Key Questions	Answers/Notes
<b>Step 2</b>	<b>Scoping the assessment</b>	
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.	
<b>Step 3</b>	<b>Consideration of data and information</b>		
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
<b>Step 4</b>	<b>Assessing the Impact</b>	
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.	<b>Equality groups</b>	Age
b.		Disability
c.		Gender
d.		Race
e.		Religion/Belief
f.		Sexual Orientation
g.		General/other
<b>Step 5</b>	<b>Reviewing and Scrutinising the Impact</b>	
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:					
If the impact is still unclear, list the actions you will put in place to gather the information you need:					
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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<b>Step 6 Decision making and future monitoring</b>		
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.
<b>Final steps</b>		
<b>For an existing function/service/policy:</b> Send your assessment to the West Kent Equalities Officer		
<b>For a new function/service/ policy:</b> Summarise your findings in the committee report. Ensure planned consultations address the findings of this impact assessment.		