

Equality Impact Assessment
Corporate Assessment Template

Policy/Strategy/Project/Procedure/Service/Function Title: Anti-Money Laundering Policy
New/Existing/Updating/Amending: Update to replace the Money Laundering Policy and Procedure

Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?	
Name: Chris Pyke	Job Title: Audit Manager, Operational Manager
Service Team: Internal Audit	Service Area: Resources
Assessment Date: 05/02/2020	

1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?

The policy aims to protect the Council from fraud and money laundering activities and enables the Council to meet the legal requirements associated with Money Laundering Regulations, in a way that is proportionate to the Council’s risk of contravening the legislation.

The Council’s reputation is underpinned by ethical behaviour, financial probity and honesty. In carrying out its functions and responsibilities, the Council seeks to promote a culture of openness and fairness. Any cases of fraud, bribery, corruption or other dishonesty could adversely affect the Council’s reputation, and put its ability to achieve its policies and objectives at risk.

This policy is designed to ensure adequate safeguards and reporting arrangements, to prevent the Council from being used by third parties for money laundering.

2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]

Money laundering is the process of making money generated by a criminal activity, such as drug dealing or theft appear to have come from a legitimate source. The policy has been developed in line with associated legislation and regulations, namely:

- Terrorism Act 2000
- Anti-terrorism, Crime and Security Act 2001
- Proceeds of Crime Act 2002

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- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- The Money Laundering and Terrorist Financing (amendment) Regulations 2019

Criminals often seek to mask their identity by using complex and opaque ownership structures. The policy includes customer due diligence requirements to support the Council to know and understand a client's identity and business activities so that any money laundering risks can be properly managed. Effective customer due diligence is therefore, a key part of anti-money laundering defenses.

The level of due diligence required in the policy for money laundering purposes is to be achieved through a risk-based approach, through which the Council will be satisfied that we sufficiently identify:

- the identity of the client
- the beneficial owner
- Information on the intended purpose of the business relationship.

The customer verification requirements are included within the policy for individuals and businesses. Any impact on particular service users will be proportionate the level of risk associated in transacting with them, as defined in the due diligence and know your customer procedure included within the policy.

3 Assess Impact on the Protected Characteristics

3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years			X
18 - 65 years			X
Over 65 years			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on age, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

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3.2 Disability

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment			X
Physical Impairment			X
Visual Impairment			X
Learning Disability			X
Long-Standing Illness or Health Condition			X
Mental Health			X
Substance Misuse			X
Other			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on disability, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.3 Gender Reassignment

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on gender reassignment, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.4. Marriage and Civil Partnership

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

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	Yes	No	N/A
Marriage			X
Civil Partnership			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on marriage and civil partnership, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			X
Maternity			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on pregnancy and maternity, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White			X
Mixed / Multiple Ethnic Groups			X
Asian / Asian British			X
Black / African / Caribbean / Black British			X
Other Ethnic Groups			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on race, but general actions have been set out to mitigate potential associated risks.

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What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			X
Christian			X
Hindu			X
Humanist			X
Jewish			X
Muslim			X
Sikh			X
Other			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on religion, belief or non-belief, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men			X
Women			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on sex, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

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	Yes	No	N/A
Bisexual			X
Gay Men			X
Gay Women/Lesbians			X
Heterosexual/Straight			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on sexual orientation, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

3.10 Welsh Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language			X

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the policy will have a differential impact on welsh language, but general actions have been set out to mitigate potential associated risks.

What action(s) can you take to address the differential impact?

Please see general actions within section 5 - comments.

4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

A copy of the Anti-Money Laundering Policy and Equality Impact Assessment (EIA) was shared with the Equality Team.

A process of consultation and engagement will take place with Trade Unions.

5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable

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Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Welsh Language	Not applicable
Generic Over-Arching [applicable to all the above groups]	Not applicable

Comment	<p>This policy refresh relates to financial processes and addresses legislative changes in respect of money laundering / terrorist financing.</p> <p>There will be no adverse impact on any equality groups or protected characteristics, as the Anti-Money Laundering Policy supports the Council in its duty to protect public funds from illegal activity and to comply with legislation. In fact, deterrence of fraud can be of general benefit to all groups. Robust processes on deterring fraud will reinforce the integrity of the Council.</p> <p>An anti-money laundering eLearning module will be produced to provide training to key staff within the Council. Advice will be sought from the Equality Team, so that suitable guidance in respect reducing any potential negative impact on any of the equality groups is incorporated.</p>
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6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : David Hexter	Date: 5 th February 2020
Designation: Group Auditor (Investigations)	
Approved By: Chris Pyke	
Designation: Audit Manager, Operational Manager	
Service Area:	Resources

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

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For further information or assistance, please contact the Citizen Focus Team on 029 2087 2536 / 3262 or email equalityteam@cardiff.gov.uk