

## Report of the Portfolio Holder for Resources and Personnel Policy

**FRAUD AND CORRUPTION PREVENTION POLICY AND MONEY LAUNDERING PREVENTION POLICY**1. Purpose of Report

To approve the updated corporate policies relating to the prevention of fraud and corruption and money laundering.

2. Recommendation

**Cabinet is asked to RESOLVE that the updated Fraud and Corruption Prevention Policy and the Money Laundering Prevention Policy be approved.**

3. Detail

Fraud and corruption are a serious and ongoing threat to the financial health of the public sector. In its latest report, the Chartered Institute of Public Finance and Accountancy (CIPFA) estimates that fraud costs the public sector at least £40.3bn each year. Of this total, an estimated £7.3bn is specifically located within local government. The Council acknowledges the significant negative impact fraudulent and corrupt acts can have on the Council, the delivery of its Corporate Plan and the services provided to residents.

The Fraud and Corruption Prevention Policy and Money Laundering Prevention Policy were last reviewed by the Governance, Audit and Standards Committee in 2017. Although there have been no significant changes in the relevant legislation or regulatory framework since this time, it is considered good practice to review such corporate policies from time to time to ensure continued relevance and effectiveness.

Accordingly, the refreshed Fraud and Corruption Prevention Policy is presented in appendix 1 to this report, whilst the Money Laundering Prevention Policy is provided in appendix 2. A table of changes is presented in appendix 3, with the updated Equality Impact Assessments for both policies provided at appendices 4 and 5 respectively.

4. Financial Implications

The comments from the Head of Finance Services were as follows:

Fraud and corruption perpetrated against the Council has a direct impact on the cost of providing services to the local community. The Fraud and Corruption Prevention Policy and the Money Laundering Prevention Policy are therefore vital in setting the framework which allows for positive counter fraud work to be undertaken across the Council. This in turn will complement and improve key

controls within systems and processes to mitigate against the risk of fraud and corruption.

5. Legal Implications

The comments from the Head of Legal Services were as follows:

This policy provides a clear framework for the council to undertake necessary, legal and proportionate actions wherever the evidence supports an investigation into an allegation of fraud, and to seek recovery of defrauded monies through all possible legal means. The Council should satisfy itself that it is complying with the obligations out in the Policy and that it is doing all it can to prevent persons associated with it from committing acts of fraud, bribery or corruption.

6. Human Resources Implications

The comments from the Human Resources Manager were as follows:

No comments.

7. Union Comments

The comments from the Unions were as follows:

No comments.

8. Climate Change Implications

The comments from the Interim Head of Environmental Services were as follows:

No comments.

9. Data Protection Compliance Implications

This report does not contain any [OFFICIAL (SENSITIVE)] information and there are no Data Protection issues in relation to this report.

10. Equality Impact Assessment

The updated Equality Impact Assessments for both the Fraud and Corruption Prevention Policy and Money Laundering Prevention Policy are provided at appendices 3 and 4 respectively. No issues regarding equalities were noted in either assessment.

11. Background Papers

Nil.

## APPENDIX 1

## FRAUD AND CORRUPTION PREVENTION POLICY

## 1. INTRODUCTION

Fraud and corruption are a serious and ongoing threat to the financial health of the UK public sector. In its latest report, the Chartered Institute of Public Finance and Accountancy (CIPFA) estimates that fraud costs the public sector at least £40.3bn each year. Of this total, an estimated £7.3bn is specifically located within local government.

Broxtowe Borough Council acknowledges the significant negative impact fraudulent and corrupt acts can have on the Council, the delivery of its Corporate Plan and the services provided to residents.

This policy is intended to document the Council's approach to fraud and corruption prevention.

## 2. POLICY STATEMENT

The Council takes a zero-tolerance approach to fraud and corruption. The Council is committed to establishing a strong anti-fraud and corruption culture and will take all necessary steps to prevent, detect and punish fraudulent and corrupt acts.

Where a fraudulent or corrupt act is proven to have taken place, the Council will take all appropriate action against the perpetrator and pursue all available options to recover any losses.

## 3. DEFINITIONS

**'Fraud'** is the intentional distortion of financial statements or other records by persons internal or external to the Council which is carried out to conceal the misappropriation of assets or otherwise for gain.

Fraud could include deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Fraud can be perpetrated by individuals both internal and external to the Council's business.

The Fraud Act 2006 creates a general offence of fraud and describes and defines three key types of fraud that are most relevant to the Council, its employees and its contractors:

- Fraud by false representation
- Fraud by failure to disclose information when there is a legal duty to do so
- Fraud by abuse of position.

In each case:

- The defendant's conduct must be dishonest;
- Their intention must be to make a gain; or cause a loss or the risk of a loss to another;
- No gain or loss needs actually to have been made;
- The maximum sentence is 10 years' imprisonment.

Under the Theft Act 1968:

- A person is guilty of theft if they dishonestly appropriate property belonging to another with the intention of permanently depriving the other of it; and 'thief' and 'steal' shall be construed accordingly.
- It is immaterial whether the appropriation is made with a view to gain, or is made for the thief's own benefit.

**'Corruption'** is the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person.

The Serious Fraud Office gives the following examples of corruption:

- Bribery – giving or receiving something of value to influence a transaction (see further on the Bribery Act 2010 below)
- Illegal Gratuity – giving or receiving something of value after a transaction is completed, in acknowledgment of some influence over the transaction
- Extortion – demanding a sum of money or goods with a threat of harm (physical or business) if demands are not met
- Conflict of Interest – where a Member or Officer has an economic or personal interest in a transaction (“the failure to disclose an interest in order to gain financial or other pecuniary benefit”).
- Kickback – a portion of the value of the contract demanded as a bribe by an official for securing the contract
- Corporate Espionage – theft of trade secrets, theft of intellectual property, or copyright piracy
- Commission/Fee – used by a company or individual to obtain the services of an agent/agency for assistance in securing a commercial contract.

The Bribery Act 2010 regards bribery and corruption as involving the offering and acceptance of a reward for doing something or perhaps not doing something that would usually occur in connection with contracts or decision making and includes offences such as:

- The offer, promise or giving of financial or other advantage to another person in return for the person improperly performing a relevant function or activity
- Requesting, agreeing to receive or accepting a financial or other advantage intending that, in consequence a relevant function or activity should be performed improperly.
- A commercial organisation responsibility for a person, associated with the organisation, bribing another person for the purpose of obtaining or retaining business for the organisation.

#### 4. CULTURE

The Council believes that the majority of its customers, members, officers and other stakeholders act with integrity and behave honestly in all their dealings with the Council. It is anticipated that a small minority of individuals will commit dishonest acts towards the Council which will have a negative impact on the Council's ability to provide services to the public.

A number of policies and other documents are available which support individuals in their interactions with the Council. These include:

- Constitution
- Financial Procedure Rules
- Code of Conduct
- Procurement and Commissioning Strategy
- Public Contracts Regulations
- Whistleblowing Policy
- Grievance Policy and Procedure.

The Council recognises the importance of its Members and employees as a critical component in implementing this Fraud and Corruption Prevention Policy. Members and employees are positively encouraged to raise any concerns, however trivial they may appear, in accordance with the Fraud and Corruption reporting procedure detailed in section 5, below.

Regular training, updates and reminders will be provided to all Members and Officers to ensure that the whole Council remains vigilant to the threat posed by fraudulent and corrupt acts.

The Council commits itself, through its Members and Officers:

- to never offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment to influence a business outcome or gain a business advantage
- to ensure adherence to legal requirements, contracts procedure rules, financial procedure rules, codes of conduct and best practice.

- to decline illegal or inappropriate gifts and hospitality, cash or cash equivalents, loans or hospitality events/meals
- to carry out appropriate due diligence enquiries where there are suspicions about whether legitimate funds are being used to support business transactions
- not to violate intellectual property rights
- not to misappropriate or misuse information assets, particularly where this is contrary to the data protection legislation
- to identify conflicts of interest and ensure withdrawal from decision making that creates or could be seen to be creating a conflict of interest.

Officers will continually consider opportunities to be pro-active in mitigating potential fraud wherever possible, for example using system functionality to provide additional checks and balances.

## 5. REPORTING PROCEDURE

The Council's Financial Procedure Rules within its Constitution require that "officers shall ensure adherence to the Council's anti-fraud and corruption prevention policies and ensure that all suspected irregularities are reported accordingly. The Deputy Chief Executive shall be notified forthwith, by the respective Chief Officer, of any circumstances which suggest the possibility of irregularity affecting cash, stores or other property of the Council. Any irregularity shall be investigated and reported upon by the Chief Audit and Control Officer to the Deputy Chief Executive who shall, where appropriate, inform the Chief Officer of the circumstances concerned. If fraud or serious irregularity is disclosed, the matter shall be reported to the Chief Executive."

The process for reporting suspicions of fraudulent or corrupt acts within the Council is the same as that for reporting matters of general malpractice as outlined in Section 6 of the Council's Whistleblowing Policy. The Whistleblowing Policy provides assurance that an individual who reports concerns in good faith will not be at risk of suffering any form of retribution as a result even if those concerns are mistaken.

In order for an individual to be afforded the protections provided by the Whistleblowing Policy the steps outlined therein must be adhered to. Suspicions reported to Managers, Chief Officers, the Monitoring Officer or the Chief Executive under the process outlined in the Whistleblowing Policy which contain allegations (direct or indirect) of fraud or corruption should be referred onto the Chief Audit and Control Officer (via the Deputy Chief Executive as appropriate) to conduct initial enquires as outlined in section 6.3 below.

## 6. ROLE OF INTERNAL AUDIT

Internal Audit traditionally plays a preventative role in trying to ensure that systems and procedures are in place to prevent and deter fraud and corruption.

Internal Audit may be requested to investigate cases of suspected financial irregularity, fraud or corruption, in accordance with agreed procedures. The authority of the Deputy Chief Executive or his authorised representative to access premises, documents, records and explanations, if required for the purposes of the internal audit, is supported within the Financial Procedure Rules.

### 6.1 Risk Assessment

The Deputy Chief Executive, as the Council's Section 151 Officer, is responsible for the ongoing assessment of the risk to the Council of financial or other loss resulting from fraud and corruption.

Whilst the focus of this risk assessment will be the potential financial loss and/or disruption to services to the public, other important areas such as reputational risk and impact on employee welfare will also be considered.

An ongoing risk assessment is completed and maintained by the Chief Audit and Control Officer, in conjunction with Chief Officers and Senior Management across the Council, and will take into account published guidance and other information from Central Government, CIPFA, the National Fraud Initiative and other relevant organisations.

### 6.2 Detection and Prevention

The risk assessment will provide the basis for an ongoing detection and preventative audit work programme to be performed. Internal Audit will liaise with management to recommend changes in procedures to reduce risks and prevent losses to the Council.

### 6.3 Response

The role of Internal Audit is to act as a co-ordinating and investigating service for all non-benefit related fraud and corruption reports and to manage the Council's response to such reports. Benefit fraud alerts are reported to the Single Fraud Investigation Service (SFIS) operated by the Department for Work and Pensions. Referrals are made by the key point of contact: a post part-funded by SFIS within the Council's Benefits department.

Internal Audit will perform initial enquires to develop a complete understanding of the suspected fraudulent or corrupt activity as reported. This may involve interviewing the person making the report, other individuals and/or a review of corporate financial systems and/or other systems and records.

The Chief Audit and Control Officer will then recommend the appropriate response to the report, which may involve:

- Primary investigation by Internal Audit

- Referral to specialist third-party fraud investigators, including local authority partners
- Referral to the Police and/or the National Crime Agency.

Documents relating to the disclosure of fraud and corruption activity will be retained for a period of up to five years.

#### 6.4 National Fraud Initiative

Internal Audit will act as the single point of contact for participation in National Fraud Initiative data matching programmes or similar such exercises. Internal Audit will be supported in this process by the respective Heads of Service and Service Managers with responsibilities for the service, system and function being subjected to review under the scheme.

### **7. REVIEW OF THE POLICY**

This policy will be kept under periodic review by the Chief Audit and Control Officer and the outcome of that review will be presented to the Deputy Chief Executive. The approval of the policy shall be the responsibility of the appropriate Committee.



## APPENDIX 2

**MONEY LAUNDERING PREVENTION POLICY****1. SCOPE**

This policy applies to all Members and Officers of the Council and aims to maintain the high standards of conduct that exist within the Council by preventing criminal activity through money laundering. The policy sets out the procedures which must be followed to enable the Council to comply with its legal obligations.

**2. DEFINITIONS**

'Money Laundering' is the term used for a number of offences, which are established in Part 7 (sections 327 to 329) of the Proceeds of Crime Act 2002, and include:

- concealing, disguising, converting, transferring criminal property or removing it from the UK;
- entering into or becoming involved in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person;
- acquiring, using or possessing criminal property.

These are the primary money laundering offences and thus prohibited acts under the legislation. There are however two secondary offences, being:

- failure to disclose any of the three primary offences;
- tipping off a person or people who are, or who are suspected of being involved in money laundering, in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.

Potentially any Member or Officer of the Council could be caught by the money laundering provisions, if they suspect money laundering and become involved with it in some way and/or do nothing about it. This Policy sets out how any concerns should be raised.

Whilst the risk to the Council of contravening the legislation is low, it is important that Members and Officers are familiar with their responsibilities and appropriate and proportionate anti-money laundering procedures and reporting arrangements are put in place.

The legislation concerning money laundering includes:

- The Proceeds of Crime Act 2002
- The Serious Organised Crime and Police Act 2005
- The Money Laundering Regulations 2007, as revised by the Crime and Courts Act 2013 and the Serious Crime Act 2015.

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

This legislation contains a broad definition of money laundering and increased the range of activities covered by the statutory framework. As a result, the requirements impact on certain areas of local authority business and require local authorities to establish internal procedures to prevent the use of their services for money laundering.

### 3. POLICY STATEMENT

**The Council is committed to the prevention, detection and reporting of money laundering and will do all it can:**

- **to prevent the Council and its Members and Officers being exposed to money laundering;**
- **to identify the potential areas where money laundering may occur; and**
- **to comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases.**

**The Council expects all Members and Officers to be vigilant for the signs of money laundering and any employee who suspects money laundering activity must report this promptly to the Money Laundering Reporting Officer (MLRO).**

### 4. MONEY LAUNDERING REPORTING OFFICER (MLRO)

The Deputy Chief Executive is the officer nominated to receive disclosures about money laundering activity within the Council. In his absence, notifications can be made to his nominated deputies being the Head of Finance Services and the Chief Audit and Control Officer.

### 5. OBLIGATIONS

The Council must:

- implement a procedure to enable the reporting of suspicions of money laundering;
- provide training to those considered most likely to encounter money laundering activities;
- maintain client identification procedures in certain circumstances;
- maintain robust record keeping procedures; and
- report any suspicious activity to the National Crime Agency (NCA).

The safest way to ensure compliance with the law is to apply these requirements to all areas of work undertaken by the Council. This means that all Members and Officers are required to comply with the reporting procedure set out below.

## **6. REPORTING ARRANGEMENTS**

Any Member/Officer who suspects money laundering activity must report their suspicion promptly to the MLRO using the prescribed form in the appendix (although they may wish to first discuss their suspicions with the MLRO).

The sanctions for failure to report suspicious money laundering activity could include disciplinary action in line with the Disciplinary Policy procedure. For Members, the equivalent sanction will be a report to the Leader of the Council for further action such as a report to the Governance, Audit and Standards Committee.

The Member/ Officer must follow any subsequent directions of the MLRO and must not themselves make any further enquiries into the matter. They must not take any further steps in any related transaction without authorisation from the MLRO. The Member/Officer must not disclose or otherwise indicate their suspicions to the person suspected of the money laundering. They must not discuss the matter with others or note on the file that a report has been made to the MLRO in case this results in the suspect becoming aware of the situation.

The MLRO must promptly evaluate any disclosure report received to determine whether it should be reported to the NCA. If it is so determined to report the matter to the NCA it should be done promptly and in the prescribed manner.

The MLRO will commit a criminal offence if they know or suspect, or have reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and they do not disclose this as soon as practicable to the NCA.

Documents relating to the disclosure of money laundering activity will be retained for a period of no longer than five years.

## **7. CLIENT IDENTIFICATION**

Where the Council is carrying out certain regulated activities, care needs to be taken to check the identity of the customer or client. This is known as carrying out customer due diligence. Regulated activity is defined as the provision 'by way of business' of advice about tax affairs, accounting services, treasury management, investment or other financial services, audit services, legal services, estate agency, services involving the formation, operation or arrangement of a company or trust, or dealing in goods wherever a transaction involves a cash payment of €15,000 or more (or equivalent).

**The Council currently has a ceiling of £5,000 in respect of any single cash payment transaction** (subject to approval of the MLRO or his nominated deputies).

Although it is not expected that work of the Council will fall under the definition of “relevant business”, Officers must be aware of the need to carry out appropriate checks on new partners in accordance with any guidance issued.

Each section conducting relevant business must maintain records of:

- client identification evidence obtained; and
- details of all relevant business transactions carried out for clients for at least five years.

This is so that they may be used as evidence in any subsequent investigation into money laundering. Although the specific detail of the records to be kept is not prescribed in law they must be capable of providing an audit trail during any subsequent investigation. In practice, the Council will be routinely making records of work carried out for clients in the course of normal business and these should suffice in this regard.

## **8. CONCLUSION**

The requirements concerning anti-money laundering procedures may be satisfied in a number of ways and this policy has been written so as to enable the Council to meet those requirements in a way that is proportionate to the risk to the Council of contravening the legislation.

## **9. REVIEW OF THE POLICY**

This policy will be kept under review by the Deputy Chief Executive. The approval of the policy shall be the responsibility of the appropriate Committee.

## APPENDIX 3

## TABLE OF CHANGES

## Fraud and Corruption Prevention Policy

Policy Section	Proposed Change	Reason for Change
1. Introduction	<p><u>Delete:</u>            “The latest report from the Chartered Institute of Public Finance and Accountancy (CIPFA) estimates that almost £300 million each year is lost as a result of fraudulent acts both against and within local authorities and other public sector organisations.”</p> <p><u>Replace with:</u>            “In its latest report, the Chartered Institute of Public Finance and Accountancy (CIPFA) estimates that fraud costs the public sector at least £40.3bn each year. Of this total, an estimated £7.3bn is specifically located within local government.”</p>	To reflect latest data available from the Chartered Institute of Public Finance and Accountancy.
4. Culture	<p><u>Add:</u>            “Officers will continually consider opportunities to be pro-active in mitigating potential fraud wherever possible, for example using system functionality to provide additional checks and balances.”</p>	To provide for ongoing improvement of counter-fraud measures throughout the Council.
5. Reporting Procedure	<p><u>Delete:</u>            “The Council’s Financial Procedure Rules within its Constitution require that “the Deputy Chief</p>	To reflect revised wording of the Council’s Financial Procedure Rules.

Policy Section	Proposed Change	Reason for Change
	<p>Executive shall be notified forthwith, by the Chief Officer of the department concerned, of any circumstances which suggest the possibility of irregularity affecting cash, stores or other property of the Council. Any irregularity shall be investigated and reported upon by the Chief Audit and Control Officer to the Deputy Chief Executive who shall, where appropriate, inform the Chief Officer of the circumstances concerned. If fraud or serious irregularity is disclosed the matter shall be reported to the Chief Executive”.</p> <p><u>Replace with:</u>                      The Council’s Financial Procedure Rules within its Constitution require that “officers shall ensure adherence to the Council’s anti-fraud and corruption prevention policies and ensure that all suspected irregularities are reported accordingly. The Deputy Chief Executive shall be notified forthwith, by the respective Chief Officer, of any circumstances which suggest the possibility of irregularity affecting cash, stores or other property of the Council. Any irregularity shall be investigated and reported upon by the Chief Audit and Control Officer to the Deputy Chief Executive who shall, where appropriate, inform the Chief Officer of the circumstances concerned. If fraud or serious irregularity is disclosed, the matter shall be reported to the</p>	

Policy Section	Proposed Change	Reason for Change
	Chief Executive.”	

**Money Laundering Prevention Policy**

Policy Section	Proposed Change	Reason for Change
2. Definitions	<u>Add:</u> “The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.”	To add reference to additional relevant secondary legislation.

## APPENDIX 4

**EQUALITIES IMPACT ASSESSMENT – FRAUD AND CORRUPTION  
PREVENTION POLICY**

Directorate: **Deputy Chief Executive**

Lead officer responsible for EIA: **Chief Audit and Control Officer**

Name of the policy or function to be assessed: **Fraud and Corruption Prevention Policy**

Names of the officers undertaking the assessment: **Chief Audit and Control Officer**

Is this a new or an existing policy or function? **Existing**

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**1. What are the aims and objectives of the policy or function?**

Fraud and corruption are a serious and ongoing threat to the financial health of the UK public sector. In its latest report, the Chartered Institute of Public Finance and Accountancy (CIPFA) estimates that fraud costs the public sector at least £40.3bn each year. Of this total, an estimated £7.3bn is specifically located within local government.

Broxtowe Borough Council acknowledges the significant negative impact fraudulent and corrupt acts can have on the Council, the delivery of its Corporate Plan and the services provided to residents.

This policy is intended to document the Council's approach to fraud and corruption prevention.

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**2. What outcomes do you want to achieve from the policy or function?**

The policy defines the Council's tolerance and approach to fraud and corruption. It also provides the framework for the formal procedures that should be followed in the event of suspected fraud and/or corrupt activity being identified and reported.

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**3. Who is intended to benefit from the policy or function?**

The Council, its Officers and Members, local residents and third party organisations including suppliers, contractors and the voluntary sector.

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**4. Who are the main stakeholders in relation to the policy or function?**

The Council, its General Management Team, Officers and Members. As an 'internal' policy, the wider population are not directly considered to be stakeholders.

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**5. What baseline quantitative data do you have about the policy or function relating to the different equality strands?**



None. There has been no prior collection of quantitative data relating to fraud and corrupt activity and its relationship to the different equality strands.

**6. What baseline qualitative data do you have about the policy or function relating to the different equality strands?**

None. There has been no prior collection of qualitative data relating to fraud and corrupt activity and its relationship to the different equality strands

**7. What has stakeholder consultation, if carried out, revealed about the nature of the impact?**

The policy is an existing policy and provides the framework for the formal procedures that should be followed in the event of suspected fraud and/or corrupt activity being identified and reported. It is considered that the policy has been, and will continue to be, applied equally across the different equality strands. As such, no such consultation has been carried out.

**8. From the evidence available does the policy or function affect or have the potential to affect different equality groups in different ways?**

No.

**Does the policy or function target or exclude a specific equality group or community?**

No.

**Does it affect some equality groups or communities differently? If yes, can this be justified?**

No.

**Is the policy or function likely to be equally accessed by all equality groups or communities? If no, can this be justified?**

Yes.

**Are there barriers that might make access difficult or stop different equality groups or communities accessing the policy or function?**

No.

**Could the policy or function promote or contribute to equality and good relations between different groups? If so, how?**

No.

**What further evidence is needed to understand the impact on equality?**

None.

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**9. On the basis of the analysis above, what actions, if any, will you need to take in respect of each of the equality strands?**

Age: None.

Disability: None.

Gender: None.

Gender Reassignment: None.

Marriage and Civil Partnership: None.

Pregnancy and Maternity: None.

Race: None.

Religion and Belief: None.

Sexual Orientation: None.

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**10. Head of Service:**

I am satisfied with the results of this EIA. I undertake to review and monitor progress against the actions proposed in response to this impact assessment:

**Signature of Head of Finance Services:**, 

## APPENDIX 5

**EQUALITIES IMPACT ASSESSMENT – MONEY LAUNDERING PREVENTION POLICY**

Directorate: **Deputy Chief Executive**

Lead officer responsible for EIA: **Chief Audit and Control Officer**

Name of the policy or function to be assessed: **Money Laundering Prevention Policy**

Names of the officers undertaking the assessment: **Chief Audit and Control Officer**

Is this a new or an existing policy or function? **Existing**

**1. What are the aims and objectives of the policy or function?**

The Money Laundering Prevention Policy aims to maintain the high standards of conduct that exist within the Council by preventing criminal activity through money laundering. The policy sets out the procedures which must be followed to enable the Council to comply with its legal obligations.

**2. What outcomes do you want to achieve from the policy or function?**

The policy will help to ensure that the Council is meeting with its legal obligations and assist in the establishment of formal procedures that should be followed in the event of suspected money laundering activity.

**3. Who is intended to benefit from the policy or function?**

The Council, the designated Money Laundering Reporting Officer (MLRO) and his nominated deputies, Officers, Members and local residents.

**4. Who are the main stakeholders in relation to the policy or function?**

The Council, the designated MLRO and his nominated deputies, Officers and Members. As an 'internal reporting' policy, the wider population are not directly considered to be stakeholders.

**5. What baseline quantitative data do you have about the policy or function relating to the different equality strands?**

None. There has been no prior collection of quantitative data relating to money laundering activity and its relationship to the different equality strands

**6. What baseline qualitative data do you have about the policy or function relating to the different equality strands?**

None. There has been no prior collection of qualitative data relating to money laundering activity and its relationship to the different equality strands.

**7. What has stakeholder consultation, if carried out, revealed about the nature of the impact?**

This is a revision and update of an existing policy and provides guidance as to the procedures that should be followed in the event of a suspected money laundering event. It is considered that the policy has been, and will continue to be, applied equally across the different equality strands. As such, no such consultation has been carried out.

**8. From the evidence available does the policy or function affect or have the potential to affect different equality groups in different ways?**

No.

**Does the policy or function target or exclude a specific equality group or community?**

No.

**Does it affect some equality groups or communities differently? If yes, can this be justified?**

No.

**Is the policy or function likely to be equally accessed by all equality groups or communities? If no, can this be justified?**

Yes.

**Are there barriers that might make access difficult or stop different equality groups or communities accessing the policy or function?**

No.

**Could the policy or function promote or contribute to equality and good relations between different groups? If so, how?**

No.

**What further evidence is needed to understand the impact on equality?**

None.

**9. On the basis of the analysis above, what actions, if any, will you need to take in respect of each of the equality strands?**

Age: None.

Disability: None.

Gender: None.

Gender Reassignment: None.

Marriage and Civil Partnership: None.

Pregnancy and Maternity: None.

Race: None.

Religion and Belief: None.

Sexual Orientation: None.

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**10. Head of Service:**

I am satisfied with the results of this EIA. I undertake to review and monitor progress against the actions proposed in response to this impact assessment:

**Signature of Head of Finance Services:** 