



Equality Screening

Anti-Money Laundering Policy

January 2026

Clanmil Housing Association has a statutory duty to screen. This includes our strategies, plans, policies, legislative developments; and new ways of working such as – the introduction, change or end of an existing service, grant funding arrangement or facility. This screening template is designed to help you consider the likely equality impacts of their proposed decisions on different groups of customers, service users, staff and visitors.

The screening template has 4 sections to complete. These are:

Section A - asks you to provide details about the policy / decision that is being screened.

Section B - has 4 key questions that require you to outline the likely impacts on equality groups, and all supporting evidence.

Section C - has 4 key questions in relation to obligations under the Disability Discrimination Order

Section D - is the formal record of the screening decision.

Section A

Details about the policy / decision to be screened

Title of policy / decision to be screened:-

Anti-Money Laundering, Fraud, Bribery and Corruption Policy

Brief description of policy / decision to be screened:-

This policy covers corporate guidelines on action that need to be taken in the event of detected or suspected money laundering, fraud, bribery, corruption or similar impropriety.

It sets out the expectations from Clanmil employees to comply with its policies, procedures and code of conduct.

The policy aims at ensuring all customers, stakeholders, employees and Board and Committee members are aware of the organisation's zero tolerance for money-laundering, fraud, bribery or corruption in any form.

Aims and objectives of the policy / decision to be screened:-

The policy was written to ensure that,

- We have a simple process for reporting suspicions of fraud, money-laundering, and corruption, in a confidential manner.
- Colleagues understand the risk areas and procedure for escalating concerns, and develop a proactive approach to detecting potential fraud.
- Expectations are clear for employees and Board/Committee members to act on suspicions or alerts.
- Customers and suppliers partner with Clanmil staff to flag suspicions and these are always followed up.
- Clanmil management and staff learn from fraud/money-laundering events and make processes improvements as result of that learning.

On whom will the policy / decision impact?

Consider the internal and external impacts (both actual or potential)



Staff / other public sector orgs (specify)



voluntary / community groups / trade unions



others, please specify – Clanmil customers, stakeholders and any members of the public who may be affected by the services we provide

Are there linkages to other Agencies/ Departments?

- Department for Communities Northern Ireland
- PSNI

Section B

1. Outline consultation process achieved or planned

The Executive Team were consulted and the new Policy was approved by GARC on the 11/09/2025.

The legislative environment and new Economic Crime & Corporate Transparency Act require reasonable action from organisations. This policy has been reviewed to comply with this update.

2. Available evidence

What evidence / information (both qualitative and quantitative) have you gathered to inform this policy? Set out all evidence below to help inform your screening assessment. Please note: It is important to record information gathered from a variety of sources such as:

- Monitoring information
- Complaints
- Research /surveys
- Consultation exercise and other public authorities

Section 75 category	Details of evidence / information and engagement
All the categories	• Clanmil's internal Fraud Register to identify risks and fraud experience • DfC Housing Association Guide and quarterly Tenancy Fraud return to identify Clanmil duties • Legislation: Proceeds of Crime Act 2002, Fraud Act 2006, Bribery Act 2010, Cyber crime prosecution guidance, Economic Crime & Corporate Transparency Act 2023

3. What is the likely impact (indicate if the policy impact is positive or negative) on equality of opportunity for those affected by this policy,

for each of the Section 75 equality categories? What is the level of impact?

Section 75 category	Likely impact?	Level of impact? Minor/Major/None
All the categories	The policy applies to everybody regardless of category under Section 75 they identify themselves with. Anyone can act as whistleblower and every suspicion raised to a Clanmil employee will be treated in confidence and with seriousness.	None

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?

Section 75 category	If Yes, provide details	If No, provide reasons
All the categories		There is full equality of access to alerting about Money Laundering / Fraud / Bribery / Corruption without promoting Section 75 categories – these are not relevant when fraud is being flagged.

3. To what extent is the policy likely to impact (positive or negatively) on good relations between people of different religious belief, political opinion or racial group? What is the level of impact?

Good relations category	Likely impact?	Level of impact? Minor/Major/None
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Religious belief	The Policy should have no impact on good relations between people of different religious beliefs, political opinions or racial groups. The process outlined in the policy applies equally to all.	None
Political opinion	As above	None
Racial group	As above	None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good relations category	If Yes, provide details	If No, provide reasons
Religious belief		The Policy is applicable irrespective of religious beliefs, political opinion or racial group.
Political opinion		As above
Racial group		As above

Section C

Clanmil Housing Association also has legislative obligations to meet under the [Disability Discrimination Order](#) and Questions 5 -6 relate to these two areas.

Consideration of Disability Duties

5. Does this proposed policy / decision provide an opportunity for the Association to better **promote positive attitudes** towards disabled people?

Explain your assessment in full

Clanmil's responsibilities and our commitment to diversity and accessibility are outlined in section 11.

Anyone wishing to alert us on fraud/money laundering/bribery/corruption suspicions will be treated equally.

This policy is neutral on Disability.

6. Does this proposed policy / decision provide an opportunity to actively **increase the participation** by disabled people in public life?

Explain your assessment in full

This policy will have no impact in this respect. Our whistleblowing process is open to all, including customers of any ability.

Monitoring Arrangements

Section 75 places a requirement for Clanmil Housing Association to have equality monitoring arrangements in place in order to assess the impact of policies and services etc; and to help identify barriers to fair participation and to better promote equality of opportunity.

Outline what data you will collect in the future in order to monitor the impact of this policy / decision on equality, good relations and disability duties.

Equality	Good Relations	Disability Duties
No data to be collected – all alerts will be treated equally and investigated with the same concern as this is a legal duty.	No data to be collected;	Any feedback on accessibility of whistleblowing for Fraud / Money laundering / Bribery / Corruption

Section D

Formal Record of Screening Decision

Title of Proposed Policy / Decision being screened

FP01 Anti-Money Laundering, Fraud, Bribery & Corruption Policy

I can confirm that the proposed policy / decision has been screened for –

X	equality of opportunity and good relations
X	disabilities duties

On the basis of the answers to the screening questions, I recommend that this policy / decision is –

*place an X in the appropriate box below

☐	*<u>Screened In</u> – Necessary to conduct a full EQIA
X	*<u>Screened Out</u> – No EQIA necessary (no impacts) Provide a brief note here to explain how this decision was reached: No discrimination possible in the policy as whistleblowing is accessible to all and Clanmil will investigate any suspicion raised.
☐	* <u>Screened Out</u> - Mitigating Actions (minor impacts) • Provide a brief note here to explain how this decision was reached: • Explain what mitigating actions and / or policy changes will now be introduced:

Formal Record of Screening Decision (cont)

Screening assessment completed by (Manager level) -

Name: Elodie Ducloux

Date: 9/02/26

Department: Finance

Signature: 

Screening decision approved by (Director level) -

Name:

STUART GREEN

Date: 15 JULY 2026

Signature: 

The screening form will be placed on the website and a link provided to the Association's Section 75 consultees.

For more information about equality screening contact Bernadette

O'Donnell, HR Business Partner at bernadette.odonnell@clanmil.org.uk

