



## **Equality Impact Assessment**

### **1. Name and outline of policy proposal, guidance, or operational activity**

**Title:**

**Crime-State Nexus (CSN) project**

**Outline:**

The CSN project is a new UK initiative that is designed to disrupt the symbiotic links between politics and crime in the Western Balkans. It is a joint Home Office-FCDO project that was initiated in September 2021 with strong ministerial support and will run until end-March 2024 with the potential for extension. The CSN project forms part of a wider Government campaign to tackle organised crime groups (OCG) with links to the Western Balkans that have the highest impact on the UK and its interests in the region.

UK intelligence has shown that Albanian OCGs present the greatest immediate and direct threat to the UK. The CSN project is therefore initially being piloted in Albania. However, it is anticipated that the project will be rolled out to other Western Balkans countries (Montenegro, North Macedonia, Serbia, Bosnia & Herzegovina, Kosovo) subject to the outcome of the project's monitoring and evaluation, and its overall success.

The links between politics and crime in the Western Balkans create a permissive environment in which serious criminals and OCGs can operate and benefit from the political protection of corrupt politicians from law enforcement activity. This political protection also provides OCGs with additional routes to launder money and enables them to use Albania as a safe haven from which to operate. In exchange, OCGs will help a politician during elections by buying votes and intimidating voters.

The CSN project aims to disrupt these links by coordinating UK action against Politically Exposed Persons (PEPs) from across the political spectrum.

The action taken against PEPs as part of the CSN project could include exclusion from the UK, sanctions, and other diplomatic levers – including strategic comms. Fundamental to the UK's approach is close cooperation with our local and international partners. We will work with Western Balkans law enforcement authorities, the judiciary, civil society, media, and our international allies to take a coordinated approach to tackle serious and organised crime and corruption in the region.

The CSN project is set to undertake its first round of action by implementing exclusions against Albanian PEPs with links to organised crime and corruption. Further rounds of action will follow in due course.

## **OPEN summary of Annex 4 Equality Impact Assessment**

UK action to expose corrupt PEPs should reduce their credibility amongst both the Western Balkan public and the Western Balkan political elites, who see both the international and domestic repercussions of tolerating corruption within political parties. The impact of this action will circulate amongst the political elite, which will send a helpful message to a wider audience about UK policy on corruption and our concerns over the culture of impunity.

By increasing the political costs of engaging in corruption, this will disincentivise Western Balkan politicians from offering political protection to OCGs. Reduced political protection should make OCGs more vulnerable to law enforcement activity in the Western Balkans and disrupt their business model. Restricting their ability to function as effectively upstream in the Western Balkans in this way will reduce the harm, they are able to cause in the UK itself, as well as to UK interests in the Western Balkans region.

Overall, the CSN project aims to:

- weaken the threat posed to the UK by Western Balkan OCGs
- protect the UK's interests in the Western Balkans
- support efforts to strengthen democracy in the region
- reduce the public perception that OCGs and criminals can operate with impunity
- strengthen the UK's reputation and credibility as a partner in tackling high level corruption

## **2. Summary of the evidence considered in demonstrating due regard to the Public-Sector Equality Duty.**

**The evidence considered to inform this EIA and which is used throughout includes OFF-SEN material that is not suitable for the public domain, and may need to be redacted should this EIA need to be released publicly.**

The evidence used to support our conclusions has been taken from a combination of operational intelligence, policy analysis, and public documents from third parties. In summary, that evidence confirms that Western Balkans SOC presents a continued threat to the UK, and that Albanian SOC presents the greatest threat to the UK and its interests.

The current intelligence picture reveals that:

- National Referral Mechanism data suggests that Albania has the highest impact on the UK MSHT threat picture out of any foreign country. Q4 2021 data shows that National Referral Mechanism data suggests that Albania has the highest impact on the UK MSHT threat picture out of any foreign country<sup>1</sup>.

---

<sup>1</sup> [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 4 2021 – October to December](#)

### **OPEN summary of Annex 4 Equality Impact Assessment**

- Albanians are also the largest foreign cohort in England and Wales prisons. As of July 2021, Albanians make up 16% of the Foreign National Offender (FNO) prison population in the UK.<sup>2</sup>

In addition to undertaking its own policy analysis and research, the Home Office has distributed and assessed the following reports:

- Reports from the Global Initiative Against Transnational Organised Crime, including:
  - How can Civil Society counter organized crime in the Western Balkans?
  - Tackling Serious and Organized Crime in the Western Balkans
  - Transnational Tentacles – Global hotspots of Western Balkan organized crime
- Various NCA, HOIO and HMRC intelligence reporting

### **3a. Consideration of limb 1 of the duty: Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act.**

#### **Age**

Anecdotal evidence suggests a significant involvement of younger males, either drawn into SOC or attracted to SOC for financial reasons.

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not their age.

*Indirect Discrimination:* we consider that there may be a minor risk of indirect discrimination based on this protected characteristic. The majority of individuals targeted as part of the CSN project's initial round of action are over the age of 50. It is expected UK action as part of the CSN project will then have a knock-on impact on WB OCGs' ability to function. As the statistics above show, this will have a disproportionate impact on those in the mid-30s age bracket. However, this is objectively justified by the policy being a proportionate means to achieve the legitimate policy aim of reducing the threat of SOC and corruption to the UK and the UK's interests.

#### **Disability**

We are not aware of any available data on disability with respect of WBOCGs.

---

<sup>2</sup> [Priti Patel signs historic removals agreement with Albania - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/priti-patel-signs-historic-removals-agreement-with-albania)

## **OPEN summary of Annex 4 Equality Impact Assessment**

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not because of any disability they may have.

*Indirect Discrimination:* we do not consider that this policy will result in indirect discrimination in respect of this protected characteristic. Individuals targeted as part of the CSN project's initial round of action, none are known to have a disability.

### **Gender Reassignment**

We are not aware of any available data on gender reassignment with respect of WBOCGs.

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not because they are proposing to undergo, are undergoing or have undergone gender reassignment.

*Indirect Discrimination:* we do not consider that this policy will result in indirect discrimination in respect of this protected characteristic. Individuals targeted as part of the CSN project's initial round of action, none are proposing to undergo, are undergoing or have undergone gender reassignment.

### **Marriage and Civil Partnership**

We are not aware of any available data on marital/civil partnership status with respect of WBOCGs.

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not their marital status.

*Indirect Discrimination:* we consider that there may be a minor risk of indirect discrimination in respect of this protected characteristic. For example, this policy may have a more considerable impact on those targeted individuals who are married compared to those who are single, as they are no longer able to travel with their spouse or partner to the UK. However, this potential interference is minor. The volume of recent travel to the UK is limited.. Only one has applied for a visa to the UK more than four times, and that individual's most recent visa was issued in 2013. It is unknown whether spouses/partners accompanied the individuals in their visits. Any potential minor interference

## **OPEN summary of Annex 4 Equality Impact Assessment**

with their family life is therefore proportionate to the aim of preventing those linked to serious organised crime from entering the UK.

### **Pregnancy and Maternity**

We are not aware of any available data on women who are pregnant or caring for an infant with respect of WBOCGs.

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not whether they are pregnant and/or mothers.

*Indirect Discrimination:* we do not consider that this policy will result in indirect discrimination in respect of this protected characteristic. Individuals targeted as part of the CSN project's initial round of action, none of the targeted individuals are mothers or pregnant.

### **Race**

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The CSN project is designed to disrupt the links between politics and crime that exist in the Western Balkans, in order to reduce the threat of SOC and to tackle corruption. The basis for this policy, and the decisions taken pursuant to it, is a given individual's nefarious conduct, including involvement in organised crime. The project is being piloted in Albania due to the fact that the national intelligence picture tells us that from the Western Balkans, Albanian OCGs continue to pose the highest threat to the UK and its interests in the Western Balkans region. As a result, any less favourable treatment is because of that individual's involvement in adverse behaviours, not their race. Accordingly, in all HMG comms as part of the CSN project where the nationality of targeted individuals is mentioned, those comms will make clear that a given individual has been targeted due to their engagement in criminality and corruption – not due to their nationality. This will help to avoid the criticism that UK action is unfairly singling out Albanian nationals.

*Indirect Discrimination:* our assessment is that this policy may indirectly discriminate against Albanian nationals, particularly in its pilot phase. As stated above, the national intelligence picture tells that from the Western Balkans, Albanian OCGs continue to pose the highest threat to the UK. Given this, Albania was selected as the country in which to pilot the CSN project in order to assess its efficacy before rollout to other Western Balkans countries. As a result, in its initial phase the CSN project is only able to take action against individuals of Albanian nationality.

However, we assess this to be objectively justified due to the policy being a proportionate means to achieve the legitimate policy objective of reducing the threat of SOC and corruption to the UK and the UK's interests.

## **OPEN summary of Annex 4 Equality Impact Assessment**

Additionally, the project at this stage is only being piloted at Albanian nationals. As the CSN project progresses it is anticipated that it will be rolled out to additional Western Balkans countries which should lead to a decline in the risk of indirect discrimination against Albanian nationals.

### **Religion or Belief**

According to the 2011 Albanian census 57% of the population identify as Sunni Muslims, while Christians make up the second largest group (17%). The remainder of the population either belong to smaller religious groups or do not identify with a particular religion.

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not their religion or beliefs.

*Indirect Discrimination:* we consider that there may be a minor risk of indirect discrimination in respect of this protected characteristic. We are unaware of the religion or beliefs of the individuals targeted in the initial round of action of the CSN project. As stated above, the religion of individuals investigated under auspices of the WBOCG is also unknown. However, should their religious beliefs reflect the findings of the 2011 census data (see above) then UK action is more likely to impact Sunni Muslims than those of other religions and beliefs. However, we assess that whilst the CSN project may result in indirect discrimination against Sunni Muslims, this can be objectively justified due to the policy being a proportionate means to achieve the legitimate policy objective of reducing the threat of SOC and corruption to the UK and the UK's interests.

### **Sex**

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not their sex.

*Indirect Discrimination:* we consider that there may be a minor risk of indirect discrimination in respect of this protected characteristic. All of the individuals targeted in our initial round of action are men. Furthermore, politics within the Western Balkans is typically male-dominated, meaning the CSN project is more likely to result in action being taken against men. It is expected UK action as part of the CSN project will then have a knock-on impact on WB OCGs' ability to function. As the data above shows, this will have a disproportionate impact on men. However, we assess that whilst the CSN project may result in indirect discrimination against males, this can be objectively justified due to the policy

## **OPEN summary of Annex 4 Equality Impact Assessment**

being a proportionate means to achieve the legitimate policy objective of reducing the threat of SOC and corruption to the UK and the UK's interests.

### **Sexual Orientation**

We are not aware of any available data on sexual orientation with respect of WBOCGs.

*Direct Discrimination:* we do not consider that this policy will result in direct discrimination in respect of this protected characteristic. The basis for this policy, and the decisions taken pursuant to it, is the individual's nefarious conduct, including involvement in organised crime. Any less favourable treatment is because of the individual's involvement in adverse behaviours, not their sexual orientation.

*Indirect Discrimination:* we consider that there may be a minor risk of indirect discrimination in respect of this protected characteristic. All of the individuals targeted in our initial round of action are heterosexual. However, we assess that whilst the CSN project may result in indirect discrimination, this can be objectively justified due to the policy being a proportionate means to achieve the legitimate policy objective of reducing the threat of SOC and corruption to the UK and the UK's interests.

**3b. Consideration of limb 2: Advance equality of opportunity** between people who share a protected characteristic and people who do not share it.

**Race:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. According to official Office for National Statistics (ONS) data for 2021, people of minority ethnicities are more likely to be victims of crime e.g. 20.8% of white people reported being a victim of crime in the, compared to: 23.2% of Asian/Asian British people; 23.2% of mixed race people; 26.5% of Black/African/Caribbean/Black British people; and 38% of Arab people.<sup>3</sup> Given that crime disproportionately affects people of minority ethnicities, by reducing the threat of SOC and corruption this policy may benefit them more greatly and so help advance equality of opportunity.

**Age:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. According to official ONS data for 2021, younger people are more likely to be victims of crime e.g. 24.2% of 18-24 year olds reported being a victim of crime, as opposed to 11.2% of 75+ year olds.<sup>4</sup> Given that crime disproportionately affects younger people, by reducing the threat of SOC and corruption this policy may benefit them more greatly and so help advance equality of opportunity.

**Disability:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. According to official ONS data for 2021, disabled

---

<sup>3</sup> [Crime in England and Wales: Annual Trend and Demographic Tables - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/crime-in-england-and-wales/annual-trend-and-demographic-tables)

<sup>4</sup> [Crime in England and Wales: Annual Trend and Demographic Tables - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/crime-in-england-and-wales/annual-trend-and-demographic-tables)

### **OPEN summary of Annex 4 Equality Impact Assessment**

people are more likely to be victims of crime e.g. 24.8% of disabled people reported being a victim of crime in the latest ONS statistics, as opposed to 20.5% of non-disabled individuals.<sup>5</sup> Given that crime disproportionately affects disabled people, by reducing the threat of SOC and corruption this policy may benefit disabled people more greatly and so help advance equality of opportunity.

**Gender Reassignment:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. Evidence suggests that those who are transgender are more likely to be the victims of crime e.g. data from the ONS shows more than one in four trans people (28%) experienced crime in the year ending March 2020, compared with 14% of people whose gender identity is the same as the sex they were registered at birth.<sup>6</sup> Given that crime disproportionately affects those who have undergone gender reassignment, by reducing the threat of SOC and corruption this policy may benefit those that will go through/are going through/have gone through gender reassignment more greatly and so help advance equality of opportunity.

**Maternity and Pregnancy:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. Due to the lack of available statistics it is not clear whether this policy negatively or positively affects the advancement of equality of opportunity for those pregnant and mothers of infants.

**Religion or Belief:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. According to official ONS data for 2021, in general people of no religion are less likely to be a victim of crime (21.6%) than those belonging to a certain faith. The exceptions to this are Christianity (20.3%) and Buddhism (18.7%).<sup>7</sup> Given that crime disproportionately affects those with certain faiths and beliefs, by reducing the threat of SOC and corruption this policy may benefit them more greatly and so help advance equality of opportunity.

**Sex:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. According to official ONS data for 2021, men are marginally more likely to be victims of crime than women – 21.5% versus 21.1%.<sup>8</sup> Given that crime disproportionately affects men, by reducing the threat of SOC and corruption this policy may benefit them more greatly and so help advance equality of opportunity.

**Sexual Orientation:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. According to official ONS data for 2021,

---

<sup>5</sup> [Crime in England and Wales: Annual Trend and Demographic Tables - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

<sup>6</sup> [Trans people twice as likely to be victims of crime in England and Wales | Transgender | The Guardian](https://www.theguardian.com)

<sup>7</sup> [Crime in England and Wales: Annual Trend and Demographic Tables - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

<sup>8</sup> [Crime in England and Wales: Annual Trend and Demographic Tables - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)



### **OPEN summary of Annex 4 Equality Impact Assessment**

non-heterosexual people are more likely to be victims of crime e.g. 22.1% of heterosexual people, compared to: 24.6% of gay/lesbian; 34.6% of bisexual; and 31% of other sexual orientations.<sup>9</sup> Given that crime disproportionately affects non-heterosexual people, by reducing the threat of SOC and corruption this policy may benefit them more greatly and so help advance equality of opportunity.

**3c. Consideration of limb 3: Foster good relations** between people who share a protected characteristic and persons who do not share it.

**Age:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. It is not expected to either negatively or positively affect the fostering of good relations between people of different age.

**Disability:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. It is not expected to either negatively or positively affect the fostering of good relations between people with and without a disability.

**Gender Reassignment:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. It is not expected to either negatively or positively affect the fostering of good relations between people who are undergoing or have undergone gender reassignment and those who are/have not.

**Maternity and Pregnancy:** This policy is focused on reducing the threat of SOC and corruption to the UK and its interests. It is not expected to either negatively or positively affect the fostering of good relations between people who are pregnant and caring for infants and those who aren't.

**Race:** Whilst this policy is focused on reducing the threat of SOC and corruption to the UK and its interests, there is a risk of a secondary negative impact on the fostering of good relations between persons of different race due to the focus of the campaign on Albania- and Western Balkan-linked criminals. This could reinforce a stereotype, and therefore prejudice, in the UK that individuals from the Western Balkans are linked to crime.

In order to minimise the risk of prejudice, the CSN project will only launch public engagement and comms in the region – at this stage there is no intention to launch CSN project-related comms in the UK. All UK comms in the Western Balkans will be balanced and proportionate and focus on the adverse behaviour of the individuals.

**Religion or Belief:** this policy is focused on reducing the threat of SOC and corruption to the UK and its interests. It is not expected to either negatively or positively affect the fostering of good relations between people with different religions or beliefs.

---

<sup>9</sup> [Crime in England and Wales: Annual Trend and Demographic Tables - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

**OPEN summary of Annex 4 Equality Impact Assessment**

**Sex:** this policy is focused on reducing the threat of SOC and corruption to the UK and its interests. It is not expected to either negatively or positively affect the fostering of good relations between people of different sex.

**Sexual Orientation:** this policy is focused on reducing the threat of SOC and corruption to the UK and its interests. It is not expected to either negatively or positively affect the fostering of good relations between people of different sexual orientation.

## OPEN summary of Annex 4 Equality Impact Assessment

### 4. Summary of foreseeable impacts of policy proposal, guidance or operational activity on people who share protected characteristics

Protected Group	Characteristic	Potential for Positive or Negative Impact?	Explanation	Action to address negative impact
<b>Age</b>		<p>Minor risk of negative impact due to indirect discrimination.</p> <p>Potential to advance equality of opportunity between younger and older people.</p>	<p>UK action may disproportionately impact individuals over the age of 50. However, this is considered to be objectively justifiable.</p> <p>Younger people are more likely to suffer from crime. By reducing crime, this policy may help them disproportionately.</p>	See section 5 below
<b>Disability</b>		Potential to advance equality of opportunity between disabled and non-disabled people.	Disabled people are more likely to suffer from crime. By reducing crime, this policy may help them disproportionately.	
<b>Gender Reassignment</b>		Potential to advance equality of opportunity for those who have undergone gender reassignment.	Those who have undergone gender reassignment are more likely to suffer from crime. By reducing crime, this policy may help them disproportionately.	
<b>Marriage and Civil Partnership</b>	<b>Civil</b>	Minor risk of negative impact due to indirect discrimination.	Impact of UK action may have a marginally greater impact on those with spouses. However, this is considered to be objectively justifiable.	See section 5 below
<b>Pregnancy and Maternity</b>	<b>and</b>	No impact identified		
<b>Race</b>		Negative impact due to indirect discrimination.	CSN project likely to disproportionately target Albanian individuals, particularly in its pilot phase which is only being run in Albania. However, this is considered to be objectively justifiable given	See section 5 Below

### OPEN summary of Annex 4 Equality Impact Assessment

		<p>acute threat of Albanian SOC to UK and its interests.</p> <p>Risk of secondary negative impact on relations between persons of different race.</p>	
<b>Religion or Belief</b>	<p>Minor risk of negative impact due to indirect discrimination.</p> <p>Potential to advance equality of opportunity for those of certain religions and beliefs.</p>	<p>UK action may disproportionately impact Sunni Muslims. However, this is considered to be objectively justifiable.</p> <p>Those of certain religions or beliefs are more likely to suffer from crime. By reducing crime, this policy may help them disproportionately.</p>	
<b>Sex</b>	<p>Minor risk of negative impact due to indirect discrimination.</p> <p>Potential to advance equality of opportunity between men and women.</p>	<p>UK action may disproportionately impact men. However this is considered to be objectively justifiable.</p> <p>Men are more likely to suffer from crime. By reducing crime, this policy may help them disproportionately.</p>	See section 5 below
<b>Sexual Orientation</b>	<p>Minor risk of negative impact due to indirect discrimination.</p> <p>Potential to advance equality of opportunity between those of different sexual orientations.</p>	<p>UK action may disproportionately impact heterosexuals. However this is considered to be objectively justifiable.</p> <p>Non-heterosexuals are more likely to suffer from crime. By reducing crime, this policy may help them disproportionately.</p>	See section 5 below

**5. In light of the overall policy objective, are there any ways to avoid or mitigate any of the negative impacts that you have identified above?**

The CSN project's approach to reducing the threat of SOC and corruption to the UK and its interests should mitigate some of the negative impacts identified above. We are taking action a small number of "high-value" influential politicians who provide Western Balkans OCGs with political protection. By taking such a targeted approach, any negative impacts felt as a result of UK action will only be felt by a small number of individuals i.e. there will not be widespread indirect discrimination. This supports our argument that UK action as part of the CSN project is a proportionate means of achieving our policy objective.

We assess that there is a particular negative impact on the basis of race, given that the CSN project is initially being piloted in Albania due to the particularly acute threat of Albanian SOC. As raised above argument is that this is objectively justified in any case, but also that this indirect discrimination on the basis of race is viewed in large part to be temporary. As the CSN project progresses it is anticipated that it will be rolled out to additional Western Balkans countries. The risk of indirect discrimination against Albanian nationals should therefore decline as the CSN project develops. We will also take steps to ensure that all comms initiated as part of the CSN project focuses on the criminality of the individual in question as the reason for the decisions, as opposed to their nationality.

We will also undertake a routine review of the national intelligence picture with regards to Western Balkans SOC and OCGs, and the threat posed to the UK and its interests in the Western Balkans region. This will ensure that where the UK takes targeted action (e.g. against certain Albanian nationals) as part of the CSN project, that this action reflects the latest intelligence picture. This will ensure that all CSN project activity remains objectively justified as a proportionate and effective means of achieving our policy objective.

Lastly, we have taken action to mitigate the risk that the CSN project has a negative impact on the fostering of good relations between persons of different race due to the focus of the campaign on Albania and Western Balkan-linked criminals. This could reinforce a stereotype in the UK that individuals from the Western Balkans are linked to crime. In order to mitigate this risk, the CSN project will only launch public engagement and comms in the region – at this stage there is no intention to launch CSN project-related comms in the UK. All UK comms in the Western Balkans will be balanced and proportionate.

**6. Review date: every 6 months, to ensure CSN project activity remains in line with PSED obligations.**

**7. Declaration**

I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that due

## **OPEN summary of Annex 4 Equality Impact Assessment**

regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

**SCS sign off: Duncan Norman**

**Name/Title: Duncan Norman (DD CSN Project)**

**Directorate/Unit: International Criminality Directorate**

**Lead contact:**

**Date: 11/7/22**