

Anti-Money Laundering Policy  
Created Operational Benefits  
by

1. Introduction
2. Scope
3. What is money laundering?
4. Policy Statement
5. Nominated Officer
6. Reporting arrangements
7. Customer due diligence
8. Enhanced due diligence
9. Record Keeping
10. Guidance & Training
11. Further Information

Appendix A – Reporting to the Money Laundering Reporting Officer (MLRO)

Appendix B – Consideration of Disclosure by the MLRO

<b>Anti-Money Laundering Policy</b>						
<b>Created by</b>	<b>Operational Benefits &amp; Corporate Fraud Manager</b>	<b>Chris Coker</b>	<b>Adopted Date</b>	<b>1/09/2022</b>	<b>Version</b>	<b>1</b>
<b>Ref</b>			<b>Review Date</b>		<b>Page 2 of 13</b>	

Anti-Money Laundering Policy						
Created	Operational Benefits	Chris	Adopted	1/09/2022	Version	1
	& Corporate Fraud Manager	Coker	Date			

2.1 This Policy applies to all employees of the council and aims to maintain the high standards of

Anti-Money Laundering Policy						
Created by	Operational Benefits & Corporate Fraud Manager	Chris Coker	Adopted Date	1/09/2022	Version	1
Ref			Review Date		Page 4 of 13	

3.3 While the risk to the Council of contravening the legislation is low, it is important that all employees are familiar with their responsibilities. Serious criminal sanctions may be imposed for breaches of the legislation. The key requirement of employees is to promptly report any suspected money laundering activity to the MLRO.

4.1 Our Policy is to do all we can to prevent, wherever possible, the Council and its staff being exposed to money laundering, to identify the potential areas where it may occur, and to comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases. We cannot stress too strongly, however, that it is every member of staff's responsibility to be vigilant.

5.1 The Officer nominate to receive disclosures about money laundering activity within the Council is the Head of Corporate Finance who is also the S151 officer. In the absence of the MLRO, the Deputy MLRO is the Head of Governance, People & Performance.

<b>Anti-Money Laundering Policy</b>						
<b>Created by</b>	<b>Operational Benefits &amp; Corporate Fraud Manager</b>	<b>Chris Coker</b>	<b>Adopted Date</b>	<b>1/09/2022</b>	<b>Version</b>	<b>1</b>
<b>Ref</b>			<b>Review Date</b>		<b>Page 5 of 13</b>	

Anti-

7.6 If, at any time, you suspect that a client or customer for whom you are currently or are planning to carry out a regulated activity is carrying out money laundering or terrorist financing, or has lied about their identity then you must report this to the MLRO.

8.3 In certain circumstances enhanced customer due diligence must be carried out for example where:

The customer has not been physically present for identification  
The customer of

Anti-Money Laundering Policy						
Created by	Operational Benefits & Corporate Fraud Manager	Chris Coker	Adopted Date	1/09/2022	Version	1
Ref			Review Date		Page 7 of 13	

Anti-Money Laundering Policy						
Created by	Operational Benefits & Corporate Fraud Manager	Chris Coker	Adopted Date	1/09/2022	Version	1
Ref			Review Date		Page 8 of 13	









<p>If there are reasonable grounds for suspicion will a Suspicious activity report (SAR) be made to the NCA?</p>
<p>If YES date report sent to NCA:</p>
<p>If NO please state below reason for non-disclosure to the NCA: (Please include details of any discussions with other officers, e.g. Legal together with name(s) and advice given)</p>

<p>Is consent required from the NCA to any on-going or imminent transactions which would otherwise be prohibited acts? If YES please confirm full details</p>
---

<b>Anti-Money Laundering Policy</b>						
Created by	Operational Benefits & Corporate Fraud Manager	Chris Coker	Adopted Date	1/09/2022	Version	1
Ref			Review Date		Page 12 of 13	

Details of liaison with the NCA	
Consent Requested	

Notice Period From	
Notice Period To	
The NCA has 7 working day starting the first working day after the consent request is made to refuse continuation of the activity. If no refusal has been received consent is deemed to have been given and the activity may continue.	

Moratorium Period From	
Moratorium Period To	

(If consent is refused during the notice period, a further 31 days starting with the day on which the consent is refused must elapse before the activity may continue. In the absence of any action to restrain the activity by law enforcement during the moratorium period the activity may continue).

Date and time given by the NCA:

Anti-Money Laundering Policy						
Created by	Operational Benefits & Corporate Fraud Manager	Chris Coker	Adopted Date	1/09/2022	Version	1
Ref			Review Date		Page 13 of 13	