

**28 April 2022**

Updated Anti-Money Laundering Policy

**Ward(s):** All

**Portfolios:** All

**Purpose: For Approval**

**1. Aim**

- 1.1 To ensure that the council has robust systems in place to appropriately manage money laundering risk.
- 1.2 To seek to improve internal processes to support both directorate actions in relation to anti-money laundering work and also statutory responsibilities in relation to onward reporting where required.

**2. Summary**

- 2.1 This report provides Audit Committee with an updated Anti-Money Laundering Policy, following internal consultation, for review and approval.

**3. Recommendations**

- 3.1 Audit Committee are requested to note, comment on and approve the updated Anti-Money Laundering Policy.

**4. Report Detail - Know**

- 4.1 This report seeks to provide an updated Anti-Money Laundering Policy for review and approval.

Updated Anti-Money Laundering Policy

- 4.2 The council's Anti-Money Laundering Policy (the "Policy") was last updated in 2017, and was based on legislation and requirements in place at that point in time, namely the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.
- 4.3 Since then there have been further developments in legislation with the Money Laundering and Terrorist Financing Regulations 2019 coming into force on 10 January 2020, which widened the regulated sector from that previously covered in the 2017 regulations.
- 4.4 Additionally the council has itself seen internal changes in management structure and responsibilities for services during the intervening period which require reflecting in the new policy.

- 4.5 Whilst it was acknowledged that the previous policy still provided appropriate guidance and controls to manage money laundering risks, in light of the above the Policy has been updated as follows:
- Update of the Policy to take account of the Money Laundering and Terrorist Financing Regulations 2019 requirements.
  - Review of the process by which reports to the 'Money Laundering Reporting Officer' are made.
  - Update of roles and responsibilities to reflect revised council post titles.
- 4.6 The revised Policy has also been through a process of internal consultation which has allowed for further feedback and amendments from service areas.
- 4.7 The final updated Policy, incorporating the outcome of the above changes, is set out at **Appendix 1**.

## **5. Financial information**

- 5.1 There are no direct financial implications associated with this update. The update to the Anti-Money Laundering Policy has been undertaken within existing resources, both internal and through the use of the corporate fraud management contract in place with Solihull council, and does not place new or additional requirements on council service areas.

## **6. Reducing Inequalities**

- 6.1 There are no equality implications directly related to this report.

## **7. Decide**

- 7.1 Audit Committee are asked to note, comment on and approve the updated Anti-Money Laundering Policy.

## **8. Respond**

- 8.1 Once the updates to the Anti-Money Laundering Policy have been approved the updated policy will be published and communicated internally to support the embedding of the document and ensure robust systems are in place.

## **9. Review**

- 9.1 A further formal review of the policy itself is scheduled every 2 years, however if updates are required prior to this, due to changes in legislation etc, then they will be actioned and reported as required.

## **Background papers**

Counter Fraud Update – Anti-Money Laundering – Reported to Audit Committee 27 February 2017

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**Walsall Council**

# Anti-Money Laundering Policy

## **Version Control**

Title: Anti-Money Laundering Policy  
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 Author: Lloyd Haynes, Deputy Head of Finance – Corporate  
 Approved By: [Audit Committee]  
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## **Amendment History**

<b>Version</b>	<b>Date</b>	<b>Comment</b>
0.1	14/09/2021	First draft for comment
0.2	08/10/2021	Revised draft incorporating Deputy Head of Finance comments
0.3	20/10/2021	Addition of credit refund limits & review date
0.4	20/10/2021	Addition of further amendments by Deputy Head of Finance
0.5	22/10/2021	Further draft amendments
0.6	29/10/2021	Initial amendments following internal consultation
0.7	12/01/2022	Final amendments following internal consultation

# **Walsall Council**

## **Anti-Money Laundering Policy**

### **January 2022**

#### **1. Introduction**

- 1.1 Walsall Council is committed to the highest standards of ethical conduct and integrity in its business activities and employs preventative measures to identify and prevent any attempts to use the council to launder money.
- 1.2 This Policy is intended to provide a clear and consistent framework to enable employees, managers and others to understand and implement arrangements enabling compliance with legislation in respect of Money Laundering and to report any disclosures.
- 1.3 Historically, legislation to tackle the laundering of the proceeds of crime was aimed at the financial and investment sector. It has, however, subsequently been recognised that those involved in criminal conduct were able to 'clean' criminal proceeds through a wider range of businesses and professional activities.
- 1.4 The Money Laundering and Terrorist Financing Regulations 2019 (MLR 2019) came into force on 10 January 2020. The Regulations widen the regulated sector from that set out in the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017) which came into force on 26 June 2017.
- 1.5 MLR 2017 implemented the EU's Directive on Money Laundering. In doing so, they replaced the Money Laundering Regulations 2007 (MLR 2007) and the Transfer of Funds (Information on the Payer) Regulations 2007, which were previously in place.

#### **2. Scope of the Policy**

- 2.1 This policy applies to all council employees, Members, agency staff, contractors and staff in partner organisations and aims to maintain existing high standards of conduct within the council by preventing criminal activity through money laundering. This Policy sets out the procedures that must be followed to enable the council to comply with its legal obligations.
- 2.2 This Policy is part of the council's counter fraud arrangements.

- 2.3 Failure by employees, Members, agency staff, contractors or staff in partner organisations to comply with the procedures set out in this Policy may lead to disciplinary action and/or prosecution.

### **3. What is Money Laundering?**

- 3.1 Money laundering is the process by which criminals attempt to conceal the true origin and ownership of the proceeds of their criminal activities. If they are successful, it allows them to maintain control over their proceeds and, to provide a legitimate cover for their source of funds. The following acts constitute money laundering under the Proceeds of Crime Act 2002:

- Concealing, disguising, converting, transferring criminal property or removing it from the UK (Section 327).
- Entering into or becoming concerned 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 (Section 328).
- Acquiring, using or possessing criminal property (Section 329).

- 3.2 There is also a ‘third party’ offence – failure to disclose one of the three main offences detailed above is an offence itself.

- 3.3 In summary, under the legislation it is a criminal offence to:

- assist a money launderer.
- tipoff or inform a person suspected to be involved in money-laundering that they are suspected or that they are the subject of a money-laundering investigation.
- fail to report a suspicion of money-laundering.
- acquire, use, access criminal property.

- 3.4 Examples of Money laundering include using large cash amounts to make purchases, asking for cash refunds on credit card payments, and overpaying bills, e.g. for council tax or business rates, then asking for cash refunds or refunds to different but legitimate bank accounts.

### **4. What are the obligations on the Council?**

- 4.1 Under the regulations, the council is required to establish appropriate risk sensitive policies and procedures in order to prevent activities related to money laundering and terrorist financing.

- 4.2 Not all of the council’s business is “relevant” for the purposes of the legislation

regarding client identification. Relevant services as defined by the legislation include investments; accountancy and audit services; and certain financial, company and property transactions. However, the safest way to ensure compliance with the law is to apply it to all areas of work undertaken by the council. Organisations conducting “relevant business” must:

- Appoint a Money Laundering Reporting Officer (“MLRO”) to receive disclosures from employees of money laundering activity (their own or anyone else’s).
- Take measures to make relevant employees aware of the law relating to money laundering and to train these employees in how to recognise and deal with transactions which may be related to money laundering and the financing of terrorism.
- Implement a procedure to enable the reporting of suspicions of money laundering.
- Maintain client identification procedures in certain circumstances.
- Maintain customer due diligence records.

4.3 While the risk to the council of contravening the legislation is low, it is important that all employees, Members, agency staff, contractors and staff in partner organisations are familiar with their responsibilities: serious criminal sanctions may be imposed for breaches of the legislation. The key requirement on employees is to promptly report any suspected money laundering activity to the MLRO.

4.4 Money laundering offences may be tried at a Magistrate’s Court or in the Crown Court, depending on the severity of the suspected offence. Trials at a Magistrate’s Court can attract fines of up to £5,000, up to 6 months in prison, or both.

4.5 In a Crown Court, fines are unlimited and with possible prison sentences of between two and fourteen years.

4.6 The following sections of this Policy provide further detail about the requirements listed in paragraph 4.2.

## **5. The Money Laundering Reporting Officer (MLRO)**

5.1 The officer nominated to receive disclosures about money laundering activity within the council is the Executive Director Resources and Transformation, the council’s Section 151 officer, who can be contacted on 01922 654725.

5.2 In the absence of the MLRO, the Director of Governance, the council’s

Monitoring Officer, is the appointed deputy who can be contacted on 01922 654824.

## **6. Reporting to the Money Laundering Reporting Officer**

- 6.1 Where an employee, Member, agency staff, contractor or staff in partner organisations knows or suspects that money laundering activity is taking / has taken place, or has become concerned that their involvement in a matter may amount to a prohibited act under sections 327-329 of the Proceeds of Crime Act, this must be disclosed as soon as practicable to the MLRO. The disclosure should be within “hours” of the information coming to the employee’s attention, not weeks or months later.

### **ANY PERSON WHO FAILS TO COMPLY WITH THIS REQUIREMENT MAY BE LIABLE TO PROSECUTION**

## **7. Procedures**

- 7.1 The council will not accept cash payments in excess of £8,000 in order to comply with the Money Laundering Regulations.
- 7.2 Also, the council will not accept a series of payments in cash that total £8,000 in respect of a single transaction (for example a sundry debtor bill). In practise this means that when a cash payment is received that the bill being paid should be examined to check whether the payment is a part payment of a bill of £8,000 or more.
- 7.3 Appropriate money laundering checks will be made where the council makes a refund as follows:
- Refunds exceeding £10,000 to the originating bank account.
  - Refunds exceeding £2,000 to a bank account that is not the originating account, or where the originating bank account cannot be identified, or where the monies were not received electronically.

### **Reporting**

- 7.4 Any employee, Member, agency staff, contractor or staff in partner organisations who suspects money laundering activity must report their suspicion promptly to the MLRO, or to the MLRO’s deputy if appropriate, using the attached form (Appendix B). If preferred, individuals can discuss their suspicions with the MLRO or their deputy first.
- 7.5 The employee, Member, agency staff, contractor and staff in partner



organisations must follow any subsequent directions of the MLRO or deputy 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.

- 7.6 Employees, Members, agency staff, contractors and staff in partner organisations must not disclose or otherwise indicate their suspicions to the person suspected of the money laundering. They must not disclose the matter to 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 (see section 8).
- 7.7 The MLRO or deputy must promptly evaluate any disclosure report, to determine whether it should be reported to the National Crime Agency (NCA).
- 7.8 The MLRO or deputy must, if they so determine, promptly report the matter to the NCA in the prescribed manner by submitting a Suspicious Activity Report (SAR) via the SAR online system at: [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk)
- 7.9 The employee, Member, agency staff, contractor or staff in partner organisations will be informed if the MLRO makes a SAR report to the NCA. Individuals should not complete any transactions **until clearance has been given by the NCA, or seven days have elapsed since the disclosure was made to the NCA.**
- 7.10 The MLRO or deputy 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.

#### Customer Due Diligence

- 7.11 Where the council is carrying out certain 'regulated activities' then extra care needs to be taken to check the identity of the customer or client; this is known as carrying out customer due diligence.
- 7.12 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 in excess of €15,000 (or equivalent).
- 7.13 The regulations regarding customer due diligence are detailed and complex, but there are some simple questions that will help decide if it is necessary:

- Is the service a regulated activity?
  - Is the council charging for the service i.e. is it 'by way of business'?
  - Is the service being provided to a customer other than a UK public authority?
- 7.14 If the answer to any of these questions is **NO** then it is not necessary to carry out customer due diligence.
- 7.15 If the answer to all these questions is YES then it is necessary to carry out customer due diligence BEFORE any business is undertaken for that client. The MLRO should be contacted if employees are unsure whether a customer due diligence is required.
- 7.16 Where employees need to carry out customer due diligence then evidence of identity must be obtained, for example:
- Checking with the customer's website to confirm their business address.
  - Conducting an on-line search via Companies House to confirm the nature and business of the customer and confirm the identities of any directors.
  - Seeking evidence from the key contact of their personal identity, for example their passport and position within the organisation.
- 7.17 The requirement for customer due diligence applies immediately for new customers and should be applied on a risk sensitive basis for existing customers. Ongoing customer due diligence must also be carried out during the life of a business relationship but should be proportionate to the risk of money laundering and terrorist funding, based on the employee's knowledge of the customer and a regular scrutiny of the transactions involved.
- 7.18 If, at any time, an employee suspects that a client or customer with whom they are, or will be, carrying out a regulated activity with is carrying out money laundering or terrorist financing, or has lied about their identity then this must be reported to the MLRO.
- 7.19 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 is a politically exposed person. Typically, a politically exposed person is an overseas member of parliament, a head of state or government or a government minister who has held that position within the last 12 months. It is also a family member or a close business associate of such a person.
- (It should be noted that the Financial Conduct Authority do not consider

those in Local Government to be politically exposed persons.)

- There is a beneficial owner who is not the customer. A beneficial owner is any individual who holds more than 25% of the shares, voting rights or interest in a company, partnership or trust.

- 7.20 Enhanced customer due diligence could include any additional documentation, data or information that will confirm the customer's identity and / or the source of the funds to be used in the business relationship/ transaction. If employees believe that enhanced customer due diligence is required then the MLRO must be consulted prior to carrying it out.

#### Record Keeping

- 7.21 Where 'relevant business' is carried out then the customer due diligence records and details of the relevant transaction(s) for that client must **be retained for at least five years** after the end of the business relationship.
- 7.22 An electronic copy of every customer due diligence record must be sent to the MLRO to meet the requirements of the Regulations and in case of inspection by the relevant supervising body.
- 7.23 **Internal Clients:** Appropriate evidence of identity for council employees will be signed, written instructions on council headed notepaper or e-mail from an internal email address at the outset of a particular matter. Such correspondence should then be placed in the council's client file along with a prominent note explaining which correspondence constitutes the evidence and where it is located.
- 7.24 **External Clients:** For external clients of the council, appropriate evidence of identity will be written instructions on the organisation's official letterhead at the outset of the matter or an email from the organisation's e-communication system. Such correspondence should then be placed in the council's client file along with a prominent note explaining which correspondence constitutes the evidence and where it is located.
- 7.25 With instructions from new clients, or further instructions from a client not well known to the council, the employee may wish to seek additional evidence of the identity of key individuals in the organisation and of the organisation itself.
- 7.26 **If satisfactory evidence of identity is not obtained at the outset of the matter then the business relationship or one-off transaction(s) cannot proceed any further.**

## **8. Offence of Tipping Off**

- 8.1 'Tipping off' refers to someone informing a person, where a report has been provided to the nominated officer of the council, that they are suspected of being involved in money laundering, in such a way that may prejudice any investigation. As such 'tipping off' may constitute a criminal offence.
- 8.2 Once a report has been made to the nominated officer, or the person the council is dealing with suspects that a report has been made, then the potential criminal offence of "tipping off" arises.
- 8.3 Any council employees, Members, agency staff, contractors and staff in partner organisations who commit such an offence may be liable to prosecution and appropriate action will be taken in relation to that.

## **9. Training**

- 9.1 In support of the policy and procedure, the council will:
- Make all employees aware of the requirements and obligations placed on the council and on themselves as individuals by the anti-money laundering legislation.
  - Give targeted training to those most likely to encounter money laundering.
  - Prepare guidance notes to assist employees in the operation of this Policy (Appendix A).

## **10. The Responsible Officer**

- 10.1 The Executive Director Resources and Transformation is responsible for the operation of the Anti-Money Laundering Policy.
- 10.2 Any employee, Member, agency staff, contractor or staff in partner organisation who has concerns about money laundering or the application of this Policy should contact the Executive Director Resources and Transformation on 01922 654725.

# **APPENDIX A**

## **Anti-Money Laundering - Employee Guidance**

### **1. What is Money Laundering?**

- 1.1 Money laundering is the disguising of the source of money, either in cash, paper or electronic form. This may be in order to conceal that the money has originated from crime, or it may be to conceal the source of money that is to be used in the pursuit of future crime.
- 1.2 Money laundering is highly sophisticated. The conversion of cash into a non-cash form of money is only the first step. In itself it is not sufficient disguise for the launderer. There will follow a complex series of transactions intended to hide the trail from any investigator. Consequently, those on the lookout for money laundering should not restrict themselves to looking for cash transactions.
- 1.3 Drug dealing in particular is a business that generates large amounts of cash that the dealers then need to re-introduce to the legitimate economy through money laundering.
- 1.4 The financiers of terrorism will attempt to disguise their links with terrorism by laundering their funding.
- 1.5 The following acts constitute the act of money laundering under the Proceeds of Crime Act 2002:
  - Concealing, disguising, converting, transferring criminal property or removing it from the UK (Section 327).
  - Entering into or becoming concerned 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 (Section 328).
  - Acquiring, using or possessing criminal property (Section 329).

### **2. Reporting of Suspected Money Laundering**

- 2.1 Where you know or suspect that money laundering activity is taking / has taken place, or has become concerned that your involvement in a matter may amount to a prohibited act under sections 327-329 of the Proceeds of Crime Act, this must be disclosed as soon as possible to the Money Laundering Reporting Officer (MLRO). The disclosure should be within "hours" of the information coming to your attention, not weeks or months later

- 2.2 The officer nominated as MLRO to receive disclosures about money laundering activity within the council is the Executive Director Resources and Transformation who can be contacted on 01922 654725.
- 2.3 If the MLRO is not available the Director of Governance is the appointed deputy who can be contacted on 01922 654824.
- 2.4 You must follow any subsequent directions of the MLRO or deputy, and must not make any further enquiries yourself. You must not take any further steps in any related transaction without authorisation from the MLRO.
- 2.5 You must not disclose or otherwise indicate your suspicions to the person suspected of the money laundering. You must not disclose 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. "Tipping off" is a potential criminal offence.
- 2.6 The offence of tipping off the money launderer that a disclosure has been made only occurs once a disclosure has been made or the person suspects that a disclosure has been made. **Consequently enquiries can be made of the individual to establish whether or not there is an innocent explanation before deciding whether or not to make a disclosure.** However, once you have reasonable grounds for knowing or suspecting that the individual is engaged in money laundering a report must be made and the suspected money launderer must not be informed of this.
- 2.7 It is an offence under the Proceeds of Crime Act if an employee enters into a transaction which they know or suspect facilitates the acquisition, retention, use or control of criminal property by, or on behalf of, another person.
- 2.8 These offences are punishable by a maximum term of imprisonment of 14 years at the Crown Court and an unlimited fine. At the Magistrates Court the penalty is a 6 month maximum term of imprisonment and a £5,000 fine.

### **3. How you might recognise Money Laundering**

- 3.1 The key slogan is "**Know Your Customer**".

- 3.2 For any transaction, cash or otherwise you should ask yourself:

"Given my knowledge of this person, is it plausible that they can pay this amount for this service by this means?"

If they are paying more than would be reasonable or more than they could afford or by a means that would not normally be used the answer would be **NO**, and

action will be required.

### 3.3 More specific possible indicators of money laundering are:

- If the source or destination of funds differ from the original details given by the client.
- If the client cancels a transaction without good reason and requests a cheque refund for previously deposited funds.
- Payment of a substantial sum in cash.
- Large overpayments of fees or money on account and subsequent requests for refunds.
- Unexpected receipts of monies, or receipts from persons previously unknown to us, and subsequent requests for a refund.
- A client requests a refund by cheque or to a different account.
- If information about a client reveals criminality or association with crime.
- If there is more than one solicitor/ conveyancer used in the sale or purchase of a property or land or if there is an unexplained and unusual geographic use of a solicitor in relation to a property's location.
- If the buyer or seller's financial profile does not fit, particularly in relation to property transactions.
- If there are over complicated financial systems.
- If the client enters into transactions which make little or no financial sense or which go against normal practice.
- If the client is happy to enter into an apparent bad deal for them.
- If the client enters into arrangements beyond their apparent financial means.
- Any odd behaviour by any of the parties involved.
- Unusual property investment transactions if there is no apparent investment purpose or rationale.
- Re: property transactions, sums are received as deposits or prior to completion from an unexpected source or instructions are given for settlement funds to be paid to an unexpected destination.

## 4. Examples of Potential Money Laundering Activities

### 4.1 Social Care and Inclusion

- 4.1.1 A social worker who is assessing a service user's finances to calculate how much they should pay towards the cost of care, then goes on to arrange for services to be provided and charged for and becomes aware of, or suspects

the existence of, criminal property.

4.1.2 A Social Worker finds a large sum of money in a client's home.

## **4.2 Children's Services**

4.2.1 A child protection case conference takes place; during the course of which it becomes clear that one of the parents is claiming benefits but has unexplained financial resources.

## **4.3 Benefits**

4.3.1 A long running fraud is identified whereby a claimant owned a property instead of being a tenant. It is also found that another property is owned by the claimant's son, which he would not have had the legitimate means to purchase.

## **4.4 Legal / Property Services**

4.4.1 The council agree to sell a parcel of land to a developer/third party, at a price that is far in excess of its value.

## **4.5 Finance**

4.5.1 An unexpected credit is received, and a request has been made to return the monies but it is unclear if the refund will go to the originating bank account.

# **5. Client Identification Procedure**

5.1 You need to be satisfied as to the identity of the client **before** any business is undertaken for that client. The client's identity can be verified on the basis of documents, data or information obtained from a reliable and independent source.

5.2 The following should be used for the identification of a private individual:

- Name.
- Address.
- Date of birth.
- National Insurance number.
- Telephone number.
- E-mail address.

5.3 The following should be used for the verification of a private individual:

- Passport.
- Driving licence.



- Birth certificate
- Current council tax and / or utility bill.
- Marriage certificate.

5.4 In the case of a representative of an organisation, this can include measures such as:

- Checking the organisation's website to confirm the business address.
- Attending the client at their business address.
- Asking the key contact officer to provide evidence of their personal identity and position within the organisation.

5.5 Where the client is acting on behalf of a third party, reasonable steps should be taken to establish the identity of that other person.

**5.6 If satisfactory evidence of identity is not obtained at the outset of the matter then the business relationship or one off transaction(s) cannot proceed any further.**

## **6. Methods to Safeguard Yourself**

6.1 Obtain sufficient evidence/ knowledge to ascertain the true identity of the person(s) you are dealing with.

6.2 Ask the key contact officer to provide evidence of their personal identity and position within the organisation; for example signed, written confirmation from their Head of Service or Chair of the relevant organisation.

6.3 Confirm the details against publicly available, such as that available on the internet / companies house etc.

6.4 Visit the client at their business address instead of always contacting them by telephone or e-mail or meeting at a council office (this will help verify the validity of the client).

6.5 Retain evidence for a period of 5 years.

## APPENDIX B

### WALSALL COUNCIL

### CONFIDENTIAL

### REPORT TO MONEY LAUNDERING REPORTING OFFICER

**To:** The Executive Director Resources and Transformation

**From:** ..... **Extn:** .....

**Directorate:** ..... **Service area:** .....

#### DETAILS OF SUSPECTED OFFENCE:

**Name(s) and address(es) of person(s) involved:**

*(if a company/ public body please include details of nature of business)*

Has any investigation been undertaken (as far as you are aware)? Yes / No

**If yes, please include details below:**

**Nature, value and timing of activity involved and cause of suspicion:**

*(Please include full details e.g. what, when, where, how.)*

Have you discussed your suspicions with anyone else ?

Yes / No

**If yes, please specify below whom the discussion took place with, when and why such discussion was necessary:**

Do you feel you have reasonable justification for not disclosing the matter to the National Crime Agency e.g. are you a lawyer and wish to claim legal professional privilege?

Yes / No

**If yes, please set out full details below:**

**Please set out below any other information you feel is relevant:**

Signed..... Dated.....

**Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. To do so may constitute a tipping off offence, which carries a maximum penalty of 5 years imprisonment.**

**When completed, please return this form immediately to the Executive Director Resources and Transformation at the following email address:**

**[deborah.hindson@walsall.gov.uk](mailto:deborah.hindson@walsall.gov.uk)**

**Your report will be treated in the strictest confidence.**

**THE FOLLOWING PART OF THIS FORM IS FOR COMPLETION BY THE**  
**MLRO**

Date report received:

Date receipt of report acknowledged:

**CONSIDERATION OF DISCLOSURE**

**Action Plan**

**OUTCOME OF CONSIDERATION OF DISCLOSURE**

Are there reasonable grounds for suspecting money laundering activity?

If there are reasonable grounds for suspicion,  
will a report be made to the National Crime Agency (NCA)?

Yes / No

If yes, please confirm date of SARS report to the NCA: \_\_\_\_\_ and  
complete the box below:

Details of liaison with the NCA regarding the report:

Notice Period: \_\_\_\_\_ to \_\_\_\_\_

Moratorium Period: \_\_\_\_\_ to \_\_\_\_\_

Is consent required from the NCA to any ongoing or imminent transactions which would otherwise be prohibited acts? Yes / No

If yes, please confirm full details in the box below:

Date consent received from the NCA: \_\_\_\_\_

Date consent given by you to employee: \_\_\_\_\_

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to the NCA, please set out below the reason(s) for non-disclosure:

*Please set out any reasonable excuse for non-disclosure)*

Date consent given by you to employee for any prohibited act transactions to proceed: \_\_\_\_\_

Other relevant information:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

***THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS***