

Borough Council of
**King's Lynn &
West Norfolk**



ANTI-MONEY LAUNDERING POLICY

January 2024

~~August 2021~~

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1. Policy Statement

1.1 The Borough Council of King's Lynn & West Norfolk (the Council) is committed to upholding the highest standards of integrity and ethics in all its activities. As part of our ongoing commitment to combat financial crime, including money laundering and terrorist financing, we have developed this Anti-Money Laundering (AML) Policy. This policy outlines our approach to preventing and detecting money laundering activities within our jurisdiction.

2. Purpose

2.1 Regulated Authorities must have provisions in place relating to Money Laundering, as a Local Authority we are not legally obliged to apply the provisions of the Money Laundering Regulations 2007. However, the purpose of this policy is to employ policy and procedures which reflect the essence of the UK's anti-terrorist financing, anti-money laundering and other anti-financial crime regimes. Guidance from the Chartered Institute of Public Finance and Accountancy ("CIPFA") indicates Local Authorities should comply with the legislation and regulations by:

- a) Adhering to the spirit of the legal obligations and regulatory requirements set forth by the United Kingdom's Money Laundering Regulations and other relevant legislation.
- b) Establishing clear guidelines and procedures to prevent money laundering activities across the Council (including its Local Authority Trading Companies (LATCs).
- c) Promoting awareness and provide training to our employees and relevant stakeholders to identify and report suspicious activities.
- d) Maintaining the integrity and reputation of the Council by demonstrating our commitment to combat financial crime.

3. Scope

3.1 This policy (and its accompanying set of procedures) applies to the Borough Council of King's Lynn & West Norfolk, and therefore applies to Members and all employees of the Council, including temporary and agency staff as well as those employed in wholly owned entities of the Council. It contains specific sections to advise employees and Members of the process to be followed to enable the Council to comply in essence with the UK's anti-terrorist financing, and anti-money laundering regimes.

3.2 This policy ensures all appropriate action is taken to prevent, wherever possible, employees, Members, and the Council from being exposed to money laundering and to comply with all legal and regulatory obligations, including the reporting of suspected or actual cases in line with disclosure requirements.

4. Introduction

- ~~1.1 Money Laundering is the process by which criminally obtained money or other criminal property is exchanged for “clean” money or other assets with no obvious link to their criminal origins. The term is used for a number of offences involving the integration of “dirty money” (i.e. the proceeds of crime) into the mainstream economy. The aim is to legitimise the possession of such monies through circulation and this effectively leads to “clean” funds being received in exchange.~~
- ~~1.2 Although local authorities are not directly covered by the requirements of The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, guidance from the Chartered Institute of Public Finance and Accountancy (“CIPFA”) indicates that they should comply with the underlying spirit of the legislation and regulations.~~
- ~~1.3 The Borough Council of King’s Lynn & West Norfolk is committed to establishing and maintaining effective arrangements to prevent and detect attempts to launder money using Council services. The Council requires all Members and employees to demonstrate the highest standards of honesty and integrity and this includes compliance with appropriate legislation. The Council is committed to working constructively with the Police and other relevant agencies in relation to combating money laundering and ensuring compliance with the legislation.~~
- ~~1.4 This policy should be read in conjunction with the Council’s Anti-Fraud and Corruption Policy. The Council will seek to ensure the corporate stance on money laundering is widely publicised and that employees and Members have access to the appropriate guidance. A breach of these procedures may lead to disciplinary and/or criminal action being taken.~~

Scope

- ~~1.5 This policy applies to the Borough Council of King’s Lynn & West Norfolk, and as a consequence it applies to Members and all employees of the Council, including temporary and agency staff as well as those employed in wholly owned entities of the Council. It contains specific sections to advise employees and Members of the process to be followed to enable the Council to comply with its legal obligations.~~
- ~~1.6 Our policy is to ensure all appropriate action is taken to prevent, wherever possible, the employees, the Council and its Members from being exposed to money laundering and to comply with all legal and regulatory obligations, including the reporting of suspected or actual cases in line with disclosure requirements.~~

4 What is Money Laundering?

4.1 The Consultative Committee of Accountancy Bodies (CCAB) states that money laundering “includes all forms of using or possessing criminal property (as well as facilitating the use or possession) regardless of how it was obtained”, where criminal property includes:

- Money or money’s worth.
- Securities.
- A reduction in a liability.
- Tangible or intangible property.

4.2 Money laundering involves “the proceeds of offending in the UK but also conduct overseas that would have been an offence had it taken place in the UK. There is no need for the proceeds to pass through the UK”. This can include the following activities:

- A single act (for example, possessing the proceeds of one’s own crime).
- Complex and sophisticated schemes involving multiple parties.
- Multiple methods of handling and transferring criminal property.
- Concealing criminal property or entering into arrangements to assist others to conceal criminal property.

4.3 Money Laundering is the process of moving illegally acquired cash through financial systems so that it appears to come from a legitimate source. Criminals will try to conceal the origin and true ownership of the proceeds of their activities to turn the money from “dirty” to “clean”. It is therefore important that businesses, even low risk ones, have procedures and policies in place to identify and prevent money laundering within their company. Money laundering is the term used to describe several offences involving the proceeds of crime or terrorist funds. It is a criminal offence to:

- Conceal, disguise, convert, transfer, or remove criminal property from the United Kingdom.
- Enter into or become concerned in an arrangement which an individual knows, or suspects facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person.
- Acquire, use, or possess criminal property.

- Fail to disclose one of the principal offences listed above, where there are reasonable grounds for knowing or suspecting the money was a proceed of crime.
- Tell someone that you are going to make a report or tell someone that they are being investigated (tipping-off).
- Falsify, destroy, dispose of, conceal any document which is relevant to an investigation, or allow this to happen.

4.4 There are three stages of money laundering:

1. **Placement:** Following the commission of a crime, the funds derived from the crime are paid into a bank account or used to purchase an asset, for example property.
2. **Layering:** In order to disguise the source of the proceeds of crime, criminals conduct complex and frequent transactions. Using 'money mules' is a form of layering and is an increasing trend in the UK. Money muling occurs when an individual receives money into their bank account (wittingly or unwittingly from a criminal) and transfers it elsewhere. The individual is often promised that they can keep a portion of the cash for facilitating this transaction.
3. **Integration:** Following the layering stage, i.e., once the source of the criminal funds are well disguised, the funds are transferred into the financial system. Therefore, the money appears normal. For example, criminals commonly sell property to integrate laundered money back into the economy.

4.5 Often linked to money laundering is terrorist financing, which is where money is used to finance acts of terrorism.

2. — What is Money Laundering?

~~2.1 — The Proceeds of Crime Act 2002 (as amended by the Crime and Courts Act 2013, Serious Crime Act 2015 and the Criminal Finances Act 2017), Terrorism Act 2000 (as amended by the Criminal Finances Act 2017) and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended by the Money Laundering and Terrorist Financing (amendment) Regulations 2019) cover a range of activities and offences in relation to money laundering. The primary ones are listed below; further details are provided in **Appendix A: Offences Table:**~~

- ~~Concealing, disguising, converting or transferring criminal property or removing it from the UK;~~

- ~~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;~~
- ~~Acquiring, using or possessing criminal property;~~
- ~~Failure to disclose knowledge or suspicion of another person(s) involvement in money laundering; and~~
- ~~Tipping off or making a disclosure which is likely to prejudice an investigation being carried out by a law enforcing authority, knowing that such an investigation is in motion.~~

~~2.2 These offences cover a range of activities, which do not necessarily need to involve money or laundering, regarding the proceeds of crime. This means that potentially any employee or Member, irrespective of what sort of Council business they are undertaking, could commit an offence if they become aware of, or suspect the existence of criminal property, irrespective of the size of the benefit gained, and/or fail to report their concerns.~~

~~2.3 Where an employee/Member suspects money laundering and reports, or are aware that someone else has, they must exercise caution in what is discussed with others as a further offence of "tipping off" may be committed if, knowing or suspecting a disclosure has been made, the employee/Member take any action which is likely to prejudice any investigation that may be conducted.~~

~~2.4 It is impossible to give a definitive list of ways in which to spot money laundering or how to decide whether to make a report. Facts which tend to suggest that something 'odd' is happening may be sufficient for a reasonable suspicion of money laundering to arise. Risk factors which may, either alone or cumulatively with other factors, suggest the possibility of money laundering activity are provided at **Appendix B: Possible Signs of Money Laundering**.~~

~~2.5 Potentially any employee or Member could be caught by the money laundering provisions if they suspect money laundering and either become involved with it in some way and/or do nothing about it, then they may be liable to prosecution. Heavy penalties, including unlimited fines and up to 14 years imprisonment, can be handed down to those who are convicted of one of the offences listed above.~~

63. Requirements of the Money Laundering Legislation

[3.16.1](#) The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 impose specific obligations on "relevant persons".

[3.26.2](#) The term relevant person relates to the following activities carried out in the course of business; tax advice; accounting services; treasury management; investment or other financial services; credit institutions; audit services; legal services; estate agents; services involving the formation, operation or arrangement of a company or trust; dealing in goods wherever a transaction involves a cash payment equivalent to €15,000 (£12,000) or more.

[3.36.3](#) Some activities undertaken by local authorities could be included within the scope of the money laundering regulations. Therefore to ensure compliance

with the regulations and legislation and for the purposes of this Policy and Guidance, the Council are considered a relevant person when acting in the course of business and activities carried on by them.

3.46.4 The obligations include the following requirements:

- Appoint a Money Laundering Reporting Officer (MLRO) responsible for receiving internal disclosures and making external disclosures of suspicious money laundering activities to the National Crime Agency (NCA). These disclosures are submitted in the form of a suspicious activity report (SAR).
- Conduct a risk assessment on money laundering and terrorist financing.
- Implement policies, procedures, systems, and controls to counter money laundering and terrorist financing risks. This includes putting in place customer due diligence, and if necessary, enhanced due diligence procedures.
- Provide training on money laundering and terrorist financing to staff.
- Establish beneficial ownership of clients i.e., to understand their ownership and structure. Obtaining sufficient knowledge to ascertain the true identity of customers in certain circumstances, by applying due diligence measures.
- Know the intended nature of business relationships and undertake ongoing monitoring of them (to identify unusual transactions).
- Implement a procedure for assessing and controlling risk and reporting suspicions of money laundering.
- A requirement to report to Companies House any discrepancies about a client's company information.
- A requirement to respond to information requests about accounts and safe-deposit boxes.
- Maintain record keeping procedures of all the due diligence undertaken (e.g., for evidence of identity obtained, details of transactions undertaken, for at least 5 years).
-

- Obtain sufficient knowledge to ascertain the true identity of customers in certain circumstances, by applying customer due diligence measures.
- Know the intended nature of business relationships and undertake ongoing monitoring of them (to identify unusual transactions).
- Implement a procedure for assessing and controlling risk and reporting suspicions of money laundering.
- Maintain record keeping procedures (e.g. for evidence of identity obtained, details of transactions undertaken, for at least 5 years).

3.56.5 The European Union 4th Money Laundering Directive requires a focus on risk assessments in relation to anti-money laundering; in particular the need to evidence that an organisation's exposure to risk is considered as part of ongoing business. As such Assistant Directors/Service Managers should maintain engagement with Internal Audit as business operations change with regard to undertaking appropriate and proportionate assessments.

7. Roles and Responsibilities

7.1 Everyone at the Council falls within scope of this policy and has a role in implementing it. Four post holders, however, have formal responsibilities in respect of the policy:

Role	Post Holder	Summary of Responsibilities
<u>Nominated Officer for Compliance (NOC)</u>	<u>Executive Director, Central Services</u>	<u>Overall responsibility for ensuring the Council complies with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and supervising its AML function.</u>
<u>Money Laundering Reporting Officer (MLRO)</u>	<u>Assistant Director, Resources (S.151 Officer)</u>	<u>Ensuring and reviewing the efficacy of this policy and promoting the compliance of all staff and members with it.</u> <u>Ensuring there are mechanisms to facilitate the reporting of any suspicions that money laundering may be taking place, receiving, and investigating any such reports and in turn making reports to the National Crime Agency (NCA).</u> <u>Working with the Council's Senior Leadership Team, identifying teams within the</u>

		<u>Council that are making loans, and recoverable grants.</u>
<u>Deputy Money Laundering Reporting Officer (DMLRO)</u>	Senior Internal Auditor	<u>Supporting and deputising for the MLRO.</u>
<u>Officer in Charge of Keeping Records (OCKR)</u>	Financial Services Manager (Deputy S.151 Officer)	<u>Ensuring arrangements are in place to store and retain due diligence and other AML documentation.</u>

4. — The Money Laundering Reporting Officer (MLRO)

4.1 — If an individual becomes aware that their involvement in a matter may amount to money laundering then they must report it to the Money Laundering Reporting Officer (MLRO) and not take any further action until they have received consent from the MLRO, who may have to be granted such consent by the National Crime Agency (NCA).

4.2 — The Council has designated the Assistant Director Resources/Section 151 Officer as the Money Laundering Reporting Officer (MLRO). In the absence of the MLRO or in instances where it is suspected that the MLRO is involved in suspicious transactions, concerns should be raised with the Executive Director, Central Services.

4.3 — The MLRO will nominate the Senior Internal Auditor to act as their deputy except in the instance that it is suspected that the Senior Internal Auditor is involved in suspicious transactions:

4.4 — **Address:** Internal Audit, Borough Council of King's Lynn & West Norfolk, Kings Court, Chapel Street, Kings Lynn, PE30 1EX

Telephone Number: 01553 616701

Email: internalauditemail@West-Norfolk.gov.uk

8 Penalties

8.1 All the offences listed within the Anti-Money Laundering Procedures

Appendix 1: Offences Table are criminal offences and committing them is punishable by prison sentences and/or a fine. For example, if found guilty of the offence of tipping off (i.e., letting the customer know that they are, or might be, the subject of a suspicion of money laundering offences) an individual may be imprisoned for up to two years and may receive a fine of an unlimited amount. The objective of making "tipping off" illegal is clear; it is to ensure that nothing is conducted which might hamper an investigation.

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8.2 You should note that offences can be committed by staff as individuals even if you are acting in the course of your employment.

9 Defences

9.1 There are certain defences available for some of the offences listed within the **Anti-Money Laundering Procedures Appendix 1: Offences Table**. The main defence for our purposes is the defence of having made an 'authorised disclosure' before any offence is committed.

9.2 If you make a disclosure to our MLRO then that disclosure will be sufficient for you to rely on this defence, provided you disclose before any offence has been committed. This is why it is so important that you read this policy carefully, comply with its requirements and act quickly.

9.3 The MLRO will then decide whether to report the suspicion to the NCA. Where a suspicion is reported, if the MLRO does not receive a 'refusal to proceed' from the NCA within a seven-day period then you can proceed with the transaction. Where a 'refusal to proceed' is received there is a further period of 31 days for the NCA to follow up their refusal with further instructions. If no further information is received within 31 days, you can proceed with the transaction.

9.4 Note that if the MLRO does report any suspicions to the NCA you must discuss with the MLRO what information you should give to the proposed recoverable grant/loan/payment recipient, so that you ensure you do not commit the offence of tipping off.

9.5 A person may also not be guilty of an offence if that person took all reasonable steps and exercised all due diligence to avoid committing the offence.

9.6 See **section 3 of the Anti-Money Laundering Procedures** for our reporting requirements.

10 Sanctions List

10.1 There is a separate but related sanctions regime that imposes restrictions on our ability to do business with those persons and entities on HM Treasury's sanctions list.

10.2 Some entries on the list are specific to a particular person or entity and others are general financial sanctions on all persons and entities in a particular jurisdiction. Sometimes the effect of the sanction is that we should never provide a loan, recoverable grant or conduct other financial transactions to those on the list. In other cases, it may be possible to proceed provided we obtain a licence granted by HM Treasury. Breaching the sanctions regimes would have serious consequences for the Council and for you as an individual. So, the analysis of sanctions risk must be an integral part of the due diligence we undertake at the outset of any loan or recoverable grant transaction. A sanctions search is part of our "Knowing Your Customer" requirements.

5. ~~Due Diligence Procedure~~

~~5.1 Where the Council is carrying out activities in the course of business (paragraph 3.2), extra care needs to be taken to check the identity of the customer— this is known as carrying out customer due diligence. This is covered in Regulations 27-38 of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. Details of the process to be undertaken is provided in **Appendix C: Customer Due Diligence Procedure Flowchart.**~~

~~When is it done?~~

~~5.2 The requirement for customer due diligence applies immediately for new customers and should be applied on a risk 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 officers' knowledge of the customer and a regular scrutiny of the transactions involved.~~

~~Cash Payment Procedure~~

~~5.3 Where cash in excess of £1000 is received from customers, employees should ask for, and inspect, identification (**Appendix D: Verification of Customer Identity**). This will help to identify and report any suspicious transactions.~~

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~~5.4 — Electronic or cheque payments to the Council are easily traceable through the banking system. As traceability is key and an individual walking in to pay a debt with cash is not necessarily traceable, it is best practice to insist on payment electronically from a UK Clearing Bank.~~

~~Satisfactory Evidence of Identity~~

~~5.5 — The Council require only the most basic of identity checks (e.g. signed, written instructions on the organisation in question's headed paper at the outset of a particular matter) documented on a Verification of Customer Identity Checklist. The following factors suggest these minimum level checks are appropriate for the Council:~~

- ~~• For Members, employees and contractors of the Council, the Council already has detailed information through recording systems and internal processes.~~
- ~~• For external customers, the Council, as a matter of law, can only provide services to other local authorities and designated public bodies. These customers are heavily regulated and most are well known to us.~~

~~Generally:~~

- ~~• We know most of our customers and those through whom they are acting — there is no, or very little, doubt as to their identity;~~
- ~~• Any services that may be defined as regulated business activities are provided to customers who are UK local authority/public bodies; and~~
- ~~• We are subject to defined, robust public sector governance and financial management controls.~~

~~Record Keeping Procedures~~

~~5.6 — Each area of the Council acting in the course of business carried on by them, see paragraph 3.2, must maintain records of every customer due diligence record, preferably electronically, and details of all relevant transactions carried out for customers for a minimum of five years from the date of (as appropriate) the transaction / end of any client relationship. This is to meet the requirements of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (Regulation 40) and may be used as evidence in any subsequent investigation/inspection by the relevant supervising body.~~

~~5.7 — Records must be capable of providing an audit trail during any investigation, for example distinguishing the customer and the relevant transaction and recording in what form any funds were received or paid. In practice, the business areas of the Council will be routinely making records of work carried out for customers in the course of normal business and these should suffice in this regard.~~

~~5.8 — Any record keeping should be in line with GDPR and the originating departments Privacy Statement.~~

6. Reporting Procedure for Suspicions of Money Laundering

- 6.1 Where an employee or Member suspects money laundering activity they must disclose this as soon as practicable to the MLRO. The disclosure should be within "hours" of the information coming to your attention, not weeks or months later.
- 6.2 Disclosures should be made to the MLRO in line with the procedure outlined at **Appendix E: Suspicious Transactions Reporting Procedure**. The standard pro-forma report attached at **Appendix F** should be used for this purpose. The report must include as much detail as possible, for example:
- Full details of the people involved (including employee or Member, if relevant);
 - Full details of the nature of their involvement;
 - The types of money laundering activity involved (see **Appendix B, Possible Signs of Money Laundering**);
 - The dates of such activities, including whether the transactions have happened, are ongoing or are imminent;
 - Where they took place;
 - How they were undertaken;
 - The (likely) amount of money/assets involved;
 - Exactly why there are suspicions; the NCA will require full reasons;
 - Any other relevant available information to enable the MLRO to make a sound judgment as to whether there are reasonable grounds for knowledge or suspicion of money laundering and to enable them to prepare their report to the NCA, where appropriate.
- 6.3 If an employee or Member becomes concerned that their own involvement in a transaction would amount to an offence under sections 327–329 of the Proceeds of Crime Act 2002 or Regulations 86–88 of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (see **appendix A, Offences Table**), then the report must include all relevant details. Consent will be required from the NCA, via the MLRO, for the individual to take any further part in the transaction. This is the case even if the customer gives instructions for the matter to proceed before such consent is given. Employees and Members should therefore make it clear in the report if such consent is required and clarify whether there are any deadlines for giving such consent e.g. a completion date or court deadline.
- 6.4 Once the matter has been reported to the MLRO then any subsequent directions provided must be followed. Further enquiries into the matter should not be made by the employee or Member; any necessary investigation will be undertaken by the NCA.
- 6.5 Should allegations be raised regarding employees of the Council then the Council's Disciplinary and Dismissal Procedure will also apply.

~~6.6 — Should allegations be raised regarding Members of the Council then the Democratic Services Manager should also be contacted.~~

~~6.7 — Reference of any reports being made to the MLRO should not be recorded on client files — should the client exercise their right to see their records, then such a note/reference will tip them off to the report having been made and may render the employee or Member liable to prosecution. The MLRO must keep the appropriate records in a confidential manner.~~

~~6.8 — Any information containing personal and/or sensitive data which is supplied or processed during the course of a money laundering investigation shall not be processed wider than is absolutely necessary for the purposes of determining whether a money laundering offence has been committed.~~

7. **11 Review**

117.1 The ~~Borough Council of King's Lynn & West Norfolk~~ will continue to review its rules and procedures and will make sure that the Anti-Money Laundering Policy is regularly reviewed to ensure it stays current, appropriate and effective.

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Policy name		Anti-Money Laundering Policy
Policy description		Regulated Authorities must have provisions in place relating to Money Laundering, as a Local Authority we are not legally obliged to apply the provisions of the Money Laundering Regulations 2007. However, as a responsible public body, the Borough Council of King's Lynn & West Norfolk who do not undertake any such regulated activities should employ policies and procedures which reflect the essence of the UK's anti-terrorist financing, and anti-money laundering regimes. Such legislation has been considered by professional bodies, resulting in best practice Guidance being issued that requires local authorities to establish internal procedures to prevent the use of their services for money laundering.
Responsible Officer		Michelle Drewery, Assistant Director Resources/S.151 Officer

Version number	Date formally approved	Reason for update	Author	Review date
1.1	30/06/20	To introduce a corporate anti-money laundering policy	Jamie Hay	April 2022
1.2		To amend titles and officers with roles within the policy due to changes in personnel.	Jamie Hay	August 2022
<u>2.1</u>		<p><u>To amend titles and officers with roles within the policy.</u></p> <p><u>To further develop the policy to include more robust details and information regarding CDD and KYC within an accompanying set of procedures to assist officers should the need arise to follow this process through providing a step-by-step guide.</u></p>	<u>Jamie Hay</u>	<u>January 2026</u>