WEST OXFORDSHIRE DISTRICT COUNCIL	**WEST OXFORDSHIRE DISTRICT COUNCIL**
Name and date of Committee	**EXECUTIVE – 15 JULY 2026.**
Subject	**PROCEEDS OF CRIME AND ANTI - MONEY LAUNDERING POLICY**
Wards affected	All
Accountable member	Councillor Alaric Smith, Executive Member for Finance Email: Alaric.Smith@westoxon.gov.uk
Accountable officer	Madhu Richards, Director of Finance (s151) Email: madhu.richards@westoxon.gov.uk
Report author	Emma Cathcart, Assistant Director Counter Fraud and Enforcement Unit Email: emma.cathcart@cotswold.gov.uk
Summary/Purpose	To present Executive with a revised Proceeds of Crime and Anti-Money Laundering Policy ('The Policy') for approval and adoption. The Policy has been reviewed to ensure the content reflects current legislation and the Council's Policies and Procedures.
Annexes	Annex A – Proceeds of Crime and Anti-Money Laundering Policy Annex B – Employee Flowchart (Proceeds of Crime and Anti-Money Laundering)
Recommendation(s)	That the Executive resolves to: 1. Approve and adopt the Proceeds of Crime and Anti-Money Laundering Policy attached to this report as Annex A. 2. Delegate authority to the Director of Finance (s151) to approve future minor amendments to the Policy, in consultation with the Executive Member for Finance, Assistant Director Counter Fraud and Enforcement Unit, and the Assistant Director Legal Services.
Corporate priorities	Working Together for West Oxfordshire
Key Decision	No
Exempt	No
Consultees/ Consultation	Any policies drafted or revised by the Counter Fraud and Enforcement Unit are provided to Legal Services for review and are issued to the relevant Senior Officers, Management and Governance Officers for

	comment.

1. EXECUTIVE SUMMARY

1.1 The Counter Fraud and Enforcement Unit ('the CFEU') is tasked with reviewing the Council's Proceeds of Crime and Anti-Money Laundering Policy ('the Policy').

1.2 It is recommended good practice that the Policy is updated and reviewed at least every few years in line with any legislative changes.

1.3 In administering its responsibilities, this Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Councillor.

2. BACKGROUND

2.1 Money laundering is the process by which funds derived from criminal activity are given the appearance of being legitimate by being exchanged for 'clean' money so that it appears to come from a legitimate source.

2.2 The proceeds of any acquisitive crime are 'cleaned up' by various means and then fed back into the financial system after a transaction or series of transactions designed to disguise the original source of the funds.

2.3 Money that funds terrorism is also covered by money laundering legislation whether the funds originated from a legitimate source or not.

2.4 Proceeds of Crime and Money Laundering legislation govern the responsibilities of individuals and organisations.

2.5 The Policy, at Annex A, defines a best practice approach for dealing with the Council's Anti-money laundering obligations and suspicious activity reports.

2.6 The Policy, and the related internal guidance procedure addresses the way in which the Council, its employees and its Members can formally discharge these obligations.

2.7 The nominated Money Laundering Reporting Officer is the Officer appointed under section 151 of the Local Government Act 1972. In the case of the Council, this is the Director of Finance.

2.8 The Policy has been refined with revisions or significantly new sections shown as red text. Any operational or procedural elements relating to the disclosure procedure, the reporting Officer's considerations or client/supplier identification process are now detailed within the supporting internal procedure document.

2.9 The majority of the other amendments are minor and are shown as insertions in red.

2.10 Attached for information at Annex B is the supporting flowchart which will be provided to employees as a supporting quick reference guide.

2.11 The Audit and Governance Committee considered the Policy in June 2021.

2.12 Awareness will be raised with employees following the approval of the Policy. General communications will be issued through internal communication channels and more direct training, and awareness will be delivered with those employees more likely to identify suspicious activity.

3. ALTERNATIVE OPTIONS

3.1 None.

4. FINANCIAL IMPLICATIONS

4.1 There are no direct financial implications arising from this report.

4.2 The adoption and approval of this Policy will help to support the prevention and detection of misuse of public funds and will support the Council's objectives in reducing crime and financial loss to the Council.

5. LEGAL IMPLICATIONS

5.1 There are no significant legal implications associated with this report.

5.2 The Policy sets out the statutory requirements that the Council must consider and adhere to when undertaking relevant activities.

6. RISK ASSESSMENT

6.1 The Council is required to mitigate the risk of money laundering and report any suspicious activity.

6.2 The Policy reduces the risk that the Council will fail to fulfil its legal obligations.

7. EQUALITIES IMPACT

7.1 None directly.

8. SUSTAINABILITY IMPLICATIONS

8.1 None directly.

9. BACKGROUND PAPERS

None. (END)