A Short Guide to Money Laundering - Counter Fraud and Enforcement Unit

What is Money Laundering?

- Where criminals use the funds obtained from their crimes to pay for goods and services / conduct financial transactions in order to 'clean' the money and hide its source

Why do criminals launder money?

- They do this so that they can enjoy the benefit of their crimes, finance other criminal activity or terrorism, and avoid detection by law enforcement agencies

Money Laundering Legislation

- There are several acts relating to Money Laundering, Proceeds of Crime and Terrorism that combine to create offences relating to money laundering and to impose rules on organisations about what they must do if they suspect money laundering

The Council's Policy

- The Council has adopted a Money Laundering policy as they recognise the importance of preventing and identifying any potential suspicious transactions

Who is affected?

- It is the responsibility of **all** employees, and Members, to be vigilant
- In certain circumstances, an individual may commit an offence if they fail to report a suspicion

Areas at risk and what to look for

- Large cash payments
- Payment of lower cash sums where cash is not the normal means of payment.
- A transaction without obvious legitimate purpose or which appears uneconomic
- Transactions at substantially above or below fair market values / suspiciously low tenders
- Overpayment is received by cash / card and a refund is requested by another means
- Involvement of an unconnected third party without logical reason or explanation
- Concerns about the honesty, integrity, identity or location of a customer/donor

Procedures

- Any cash transaction of £3,000 or more, or linked transactions that have totalled £10,000, or more, in four or less cash payments must be reported immediately to the Chief Finance Officer
- Any large cash payments must be treated with caution. No payment in cash in excess of £3,000 will be accepted without the prior approval of the CFO

Your Responsibilities

- Anyone who suspects that a transaction could be linked to money laundering or the proceeds of crime should report the matter to the Chief Finance Officer

Further Information and Guidance

- The Proceeds of Crime and Anti-Money Laundering Policy is available and advice and guidance can be obtained from the Chief Finance Officer or from the Counter Fraud and Enforcement Unit