



Doncaster Council

Anti-Money Laundering Fact Sheet

This factsheet is aimed at Doncaster Council Members and officers

Fraud and corruption is ever present in the UK and global economies and money laundering is part of the ever changing fraud landscape as criminals attempt to use the proceeds of their crimes.

Doncaster Council is committed to addressing these risks. This factsheet gives basic details for staff about money laundering and their responsibilities.

What is money laundering?

The term "Money Laundering" describes offences involving the integration of the proceeds of crime, or terrorist funds, into the mainstream economy. The "laundered" funds can then be used for legitimate transactions that do not arouse suspicion. It is a favoured method of organised criminals and terrorists.

Whilst most of the Council's activities are unlikely to be at risk from money laundering staff need to be vigilant wherever cash transactions are involved. This means any service that receives income is potentially at risk, as are those involved in property sales, council house Right to Buy sales and any service dealing with or looking after the finances of another person or body. This list is not exhaustive.

Money laundering can happen as a single transaction or a series of smaller linked transactions.

What are my responsibilities?

As an employee you need to:

- ✓ be aware and look out for money laundering as part of your day to day interactions with customers;
- ✓ undertake "*due diligence*" checks on any higher risk transactions or any cash transaction of €15,000 or more;
- ✓ look out for, and seek advice on any transactions involving countries such as Afghanistan, Syria and Korea (a full list relevant countries is available under *due diligence*);
- ✓ seek advice on any issues you are not sure about;
- ✓ report any concerns from those checks (or from your day job), in respect of money laundering to the Money Laundering Reporting Officer using the Money Laundering Reporting Form on the intranet.
- ✓ follow any instructions from the Money Laundering Reporting Officer when given

Do not:

- ✗ continue with any transaction once you have referred it to the Money Laundering Reporting Officer unless instructed to do so;
- ✗ attempt to investigate the suspected money laundering (beyond undertaking the "*due diligence*" checks below);
- ✗ discuss any suspicions of money laundering with the customer or record any such suspicions on their customer file (this is because this could tip off the suspect about a possible investigation)
- ✗ ignore your suspicions / concerns.

Failure to report suspected money laundering is a criminal offence and you could be liable to prosecution and disciplinary action.

Failing to report money laundering carries a 5 year prison sentence and / or a fine.

Due diligence?

Due diligence is the name given to the additional checks undertaken in transactions at risk from money laundering activity. These checks are undertaken to ensure that we know exactly who we are dealing with, why and where the funds are coming from before we enter into a transaction (such as a cash sale for property or receive large amounts of cash). Due diligence checks include (but are not limited to);

- identity checks using official photographic ID sources, bank statements and credit reports for all those involved in a transaction,
- ensuring that we understand the ownership behind any company or trust so that we know exactly who we are dealing with; and
- ensuring that we know where the funds are coming from (which can involve requesting bank or other financial statements to confirm the source of the funds) before accepting the transaction.

More guidance on these checks is available in the full Anti-Money Laundering Policy.

Enhanced checks are needed where there is any involvement in the transaction by persons from certain countries. These include: Afghanistan, Bosnia and Herzegovina, Guyana, Iraq, Lao Peoples Democratic Republic, Syria, Uganda, Vanuatu, Yemen, Iran and the Democratic People's Republic of Korea. You should seek advice from Internal Audit Services if you are involved in any such transaction.

Reporting suspicions of money laundering activity

If you suspect money laundering, you must report it to the Money Laundering Reporting Officer. This is the Chief Financial Officer and Assistant Director of Finance. via the *Money Laundering Reporting Form* that is available on the Council's intranet site.

When completing the form, please give as much information as you can, but remember, you should not try to investigate the issue yourself.

The Money Laundering Reporting Officer will review your referral and will make further enquiries. This may mean that you are asked for more information or to provide copies / evidence from the due diligence checks you have undertaken.

You must not proceed with any suspicious transactions until these are cleared and you are instructed to by the Money Laundering Reporting Officer.

If your concerns are upheld, they will be relayed to the National Crime Agency for further investigation.

Further information

Further information can be found in the full Anti-Money Laundering Policy on the Council's intranet site.

For advice on money laundering, please contact Nicola Frost-Wilson on 01302 862931.