

Report to:

AUDIT COMMITTEE

Relevant Officer:

Tracy Greenhalgh – Head of Audit and Risk

Meeting

29 February 2024

ANTI-MONEY LAUNDERING POLICY AND PROCEDURE (2024)

1.0 Purpose of the report:

1.1 To consider the Anti-Money Laundering Policy and Procedure for approval.

2.0 Recommendation(s):

2.1 The Audit Committee is asked to approve the reviewed Anti-Money Laundering Policy and Procedure.

3.0 Reasons for recommendation(s):

3.1 Although local authorities are not directly covered by the requirements of the Money Laundering Regulations, guidance from the Chartered Institute of Public Finance and Accountancy (CIPFA) indicates that Councils should comply with the underlying spirit of the regulations. It states that a 'prudent and responsible' Council will adopt 'appropriate and proportionate' policies and procedures designed to 'detect and avoid involvement in crimes described in the legislation and regulations'.

3.2 Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.3 Is the recommendation in accordance with the Council's approved budget? Yes

4.0 Other alternative options to be considered:

4.1 N/a

5.0 Council priority:

5.1 The relevant Council Priority is organisational resilience.

6.0 Background information

6.1 The Anti-Money Laundering Policy and Procedure explains what money laundering is and the legal framework that is in place to govern it. It also details the procedures that need to be followed by the Council.

The policy and procedure were last reviewed in 2018 and this review ensures that the Policy

and Procedure remain current albeit with very minor changes.

The aims of the policy and procedure are to:

- Assist staff and elected members at Blackpool Council to understand money laundering and their personal legal obligations and responsibilities arising from the requirements of legal and regulatory provisions.
- Reduce the risk of Council services being used for money laundering purposes.
- Set out the procedures that must be followed to enable the Council and its staff to comply with their legal obligations.

6.2 Does the information submitted include any exempt information? No

7.0 List of Appendices:

7.1 Appendix 11(a) – Anti-Money Laundering Policy and Procedure 2024

8.0 Financial considerations:

8.1 The Council could be subject to financial loss should the policy and procedure not be adhered to.

9.0 Legal considerations:

9.1 The Policy sets out the legal framework which governs the prevention of money laundering procedures.

10.0 Risk management considerations:

10.1 The adoption of and adherence to the policy and procedure will help protect the Council and its employees against the risk of money laundering. Key areas of risk in a local authority setting include services where cash is collected and legal transactions such as the acquisition of properties.

11.0 Equalities considerations and the impact of this decision for our children and young people:

11.1 The Council will always act with regard to current pertinent legislation when investigating money laundering and without prejudice.

12.0 Sustainability, climate change and environmental considerations:

12.1 The Anti-Money Laundering Policy and Procedure 2024 does not have a direct impact on the climate change agenda.

13.0 Internal/external consultation undertaken:

13.1 The Money Laundering Reporting Officer and their deputy have developed this Policy and Procedure. As there are no key changes to legislation wider consultation with other Council services has not been undertaken this year as the key principles of the Policy remain unchanged.

14.0 Background papers:

14.1 N/a