

TRAFFORD COUNCIL

Report to: Accounts and Audit Committee
Date: 14 March 2023
Report for: Approval
Report of: Audit and Assurance Manager

Report Title

Anti-Fraud and Corruption Strategy, Policy and Supporting Guidance

Summary

The Council's Anti-Fraud and Corruption Strategy, Policy and supporting guidance has been revised and updated. These documents have been reviewed and updated by the Audit and Assurance, Counter Fraud and Legal Services teams.

The Policy defines economic crime and then sets out measures to prevent, deter, recover and apply associated sanctions.

This report comprises background in respect of anti-fraud and corruption arrangements and then sets out the refreshed Anti-Fraud and Corruption Strategy document which includes the Council's Anti-Fraud and Corruption Policy and Fraud Response Plan.

Supporting the Strategy are various other policies and guidance. The Anti-Money Laundering Policy and procedures were updated in 2022/23 and are included with this report. Any other supporting policies and guidance subject to review will be reflected in further updates in relation to the Strategy.

Recommendation

The Accounts and Audit Committee is asked to approve the Anti-Fraud and Corruption Strategy, Policy and supporting guidance.

Contact person for access to background papers and further information:

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Background Papers:

None

Anti Fraud and Corruption Strategy, Policy and Supporting Guidance

1. Introduction

As part of its risk management processes, the Council has to ensure that there is a robust framework in place to mitigate the risk of fraud, bribery and corruption. This report contains the Anti-Fraud and Corruption Strategy and related documentation.

2. Background

Trafford Council is determined to discharge its responsibility to safeguard public funds and promote a 'zero tolerance' culture to fraud and corruption.

The Anti-Fraud and Corruption Strategy sets out the Council's position which is to prevent any act of financial impropriety that puts the Council's resources at risk.

The Strategy requires that where such actions committed by employees are suspected, those actions will be referred for disciplinary investigation and treated as potential gross misconduct.

Where sufficient evidence exists cases will be reported for investigation either by the police or the Council's own investigation resources and considered for criminal prosecution or civil recovery.

The Council will continue to publicise results of successful criminal prosecutions or recoveries both on its website and in local newspapers. By doing so the Council highlights the effectiveness of arrangements in place to detect fraud and corruption and the sanctions being applied.

This report includes:

- The overarching Strategy
- The Council's Anti-Fraud and Corruption Policy (Appendix A)
- The Council's Fraud Response Plan and supporting guidance (Appendix B)
- The Council's Anti-Money Laundering Policy (Appendix C)

3. Update of the Anti-Fraud and Corruption Strategy and Policy

The Anti-Fraud and Corruption Strategy, Policy and Fraud Response Plan have been refreshed to reflect a number of developments since these were last reviewed. This includes changes in contact details for reporting fraud as well as reflecting other changes such as the Council's priorities and anti-fraud guidance. The report also includes the Council's Anti-Money Laundering Policy and guidance which was subject to review and update during the year.

4. Future Reporting

CLT and the Accounts and Audit Committee will continue to be provided with updates in relation to anti-fraud and corruption activity. This will include

details of work completed and key outcomes reflected in the Counter Fraud Team 2022/23 annual report and also the 2022/23 Annual Head of Internal Audit Report. This will include details of progress in relation to work supporting the Council's National Fraud Initiative.

Where applicable, Internal Audit and the Counter Fraud teams will continue to liaise with other services to review and update relevant policies, procedures and guidance supporting this Strategy. There will be work planned in 2023/24 by the Council's Counter Fraud Team to raise awareness of the anti-fraud and corruption guidance including regards the reporting of instances of fraud.



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Anti- Fraud and Corruption Strategy

March 2023

Date of issue	Description of changes
March 2023	Revised to reflect a number of changes such as the Council's corporate priorities, updated guidance, changes in services, job titles and other contact details. Anti-Corruption Policy updated to include reference to fraud investigations relating to Business Support Grants. The Anti-Money Laundering Policy and Guidance was reviewed and updated in 2022/23.
November 2020	Contact details for reporting fraud updated
March 2017	Revised to include updated contact details for reporting fraud (See Section 2 of Fraud Response Plan and Anti-Fraud Guidance for Employees); Also updates have been made to the Anti-Fraud and Corruption Strategy, Policy, guidance and Prosecution Policy to reflect changes in fraud investigation arrangements given the transfer of the Benefit Fraud Investigation Team to the DWP in March 2016 and formation of the Council's Counter Fraud and Enforcement Team.
November 2012	Revised and updated to incorporate the Bribery Act (effective from July 2011). Updated to reflect the Local Government Fraud Strategy and service structure changes.
September 2009	Revised to include a reference to IT systems using Council data
October 2006	Revised to incorporate Fraud Act 2006, Fraud Response Plan and Prosecution Policy.
October 2005	Revised to include Strategy document.
September 2004	Initial document approved by the Executive.

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ANTI- FRAUD AND CORRUPTION STRATEGY

1. Introduction

- 1.1 Trafford Council is committed to the highest standards of honesty and integrity. The Council is determined to discharge its responsibility to safeguard public funds and is committed to fighting fraud, bribery, corruption and misappropriation whether attempted from inside or outside of the organisation.
- 1.2 Resources of the Council are limited. Fraudulent activity reduces these resources and impacts on the Council's reputation, on the job security of its employees and most importantly its ability to deliver effective services.
- 1.3 This document sets out the Council's position on fraud and corruption. This Anti- Fraud and Corruption Strategy is designed to integrate with and reinforce the Council's corporate vision, outcomes and priorities.
- 1.4 Fraud and corruption is not tolerated by the honest majority and as part of its risk management process, the Council has to ensure that there is a robust framework in place to mitigate the risk of theft, fraud, bribery and corruption.
- 1.5 The Council's aim is to: -
 - Create a 'zero-tolerance' culture to theft, fraud, bribery and corruption
 - Create a strong deterrent effect and prevent fraud and corruption by designing and redesigning policies and systems;
 - Continue to detect and investigate fraud and corruption
 - Apply sanctions and recovery procedures where appropriate.
 - Reduce losses to fraud and corruption to an absolute minimum.

2. Scope

- 2.1 The Anti- Fraud and Corruption Strategy applies to: -
 - Elected Members
 - Employees at all levels
 - All organisations, contractors and partners associated with the Council
 - Service users; and
 - Other stakeholders.

3. Definitions

- 3.1 For the purposes of this strategy and associated policies, the definitions of fraud, bribery, corruption and theft are those referred to in Appendix A - the Anti-Fraud and Corruption Policy.

4. The Council's Approach

- 4.1 The Council's approach to reducing theft, fraud, bribery and corruption is based on the strategic approach outlined in the local government counter fraud & corruption strategy , "Fighting Fraud Locally", the key headings of which are Govern, Acknowledge, Prevent, Pursue and Protect. This is:-

- Govern through support from Members and Senior Management.
- Acknowledging and understanding fraud risks
- Preventing and detecting more fraud.
- Pursuing fraudsters and recovering losses.
- Protect both the organisation and individuals from fraud risk

- 4.2 "Fighting Fraud and Corruption Locally 2020" reports that Local authorities can further develop and enhance their counter fraud response by considering each of the six themes below – the six Cs.

- **Culture** - creating a culture where fraud and corruption are unacceptable and that is measurable
- **Capability** - assessing the full range of fraud risks and ensuring that the range of counter fraud measures deployed is appropriate
- **Competence** - having the right skills and standards commensurate with the full range of counter fraud and corruption activity
- **Capacity** - deploying the right level of resources to deal with the level of fraud risk that is monitored by those charged with governance
- **Communication** - raising awareness internally and externally, deterring fraudsters, sharing information, celebrating successes
- **Collaboration** - working together across internal and external boundaries: with colleagues, with other local authorities, and with other agencies; sharing resources, skills and learning, good practice and innovation, and information.

- 4.2 The Council is committed to taking action in order to prevent fraud, ensure that appropriate resources are available to detect fraud and where this is identified, that sanctions are imposed and action taken to recover losses.

- 4.3 The standards by which this can be assessed are outlined in the Code of Practice on Managing the Risk of Fraud as published by the Chartered Institute of Public Finance Accountancy (CIPFA). These include:

- Acknowledging responsibility for managing risks
- Identifying the risks
- Developing a strategy
- Providing resources
- Taking action.

4.4 The Council is committed to taking action to meet these standards and the approach is outlined within the following documents which form part of this overall strategy: -

- **Anti- Fraud and Corruption Policy** setting out the stance of the council and its overall approach including roles and responsibilities (see Appendix A)
- **Fraud Response Plan** setting out the procedures to be followed by employees where a fraud is suspected or detected (see Appendix B).

5. Risk Management

5.1 The risks of theft, fraud, bribery and corruption should be considered as part of the Council's risk management arrangements incorporating the management of both strategic and operational risks. This includes risks to be managed corporately; by individual services; by project teams and partnerships.

6. The Corporate Framework

6.1 The corporate framework which underpins this strategy includes the following: -

- The relevant Codes of Conduct for elected Members and employees
- The Council's Constitution including the Finance Procedure Rules, Contract Procedure Rules and the Scheme of Delegation
- The Whistleblowing Policy (Confidential Reporting Code)
- The Anti- Money Laundering Policy
- Prosecution Policy
- The work by the Audit and Assurance Service, Counter Fraud Team and Trading Standards
- Participation in National Anti-Fraud Initiatives (NFI) and the National Anti-Fraud Network (NAFN)
- The ICT Acceptable Use Policy
- Recruitment procedures
- Staff disciplinary procedures.

7. Review of the Anti- Fraud and Corruption Strategy

7.1 The strategy will be reviewed on a regular basis and updated as necessary. Any significant changes will be referred to and approved by

the Corporate Leadership Team and the Accounts and Audit Committee.



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Anti- Fraud and Corruption Policy

March 2023

Anti- Fraud and Corruption Policy

1. Introduction

- 1.1 This document sets out the position taken by the Council on fraud, bribery, corruption and theft. It is intended to set out for councillors and employees the Council's position and how suspicions or incidents that might come to their attention should be dealt with.

2. Aims and Objectives

- 2.1 The aims and objectives of the Anti- Fraud and Corruption Policy are to:-
- a) Provide a clear statement on the Council's position on fraud, bribery corruption and theft;
 - b) Minimise the risk to the Council's assets and good name;
 - c) Promote a culture of integrity and accountability in councillors, employees and all those the Council does business with;
 - d) Ensure the Council achieves its objectives and priorities;
 - e) Enhance procedures aimed at preventing, deterring and detecting fraud and corruption;
 - f) Raise awareness of the risk of fraud and corruption being perpetrated against the Council;
 - g) Seek to ensure probity and propriety in all finance related matters.

3. Definitions

- 3.1 The definitions of fraud, corruption, bribery and also of theft are given here.

- 3.2 Fraud is defined as stated in The Fraud Act 2006 and can be committed in a variety of ways:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position
- Possession of articles for use in fraud
- Making or supplying articles for use in fraud
- Obtaining services dishonestly
- Participating in fraudulent business.
- Liability of company officers for offences by a company.

To prove fraud, conduct must have been dishonest and the intention must be to make a gain or cause a loss or the risk of a loss to another. Crucially, no gain or loss needs actually to have been made.

The maximum sentence for fraud is 10 years imprisonment.

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Anti- Fraud and Corruption Policy

- 3.3 **Corruption** is broadly defined as the abuse of entrusted power for private gain. It is often used interchangeably with bribery. Other forms of corruption include embezzlement, fraud, collusion, favouritism and extortion.
- 3.4 **Bribery.** One form of a corrupt act is bribery. Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage and concerns the improper performance by:
- Giving and / or offering inducements
 - Receiving and / or requesting inducements

There is a maximum penalty of 10 years imprisonment for all offences.

- 3.5 **Theft** is defined in the 1968 Theft Act. It is the dishonest taking of property belonging to another person with the intention of permanently depriving the owner of its possession.

The maximum sentence is 7 years imprisonment.

4. Policy Statement

- 4.1 The Council is committed to preventing, discouraging and detecting theft, fraud, bribery and corruption, whether attempted on, or from within the Council.
- 4.2 The Council expects all elected members, employees and all persons working on behalf of the Council to act with integrity, and to carry out their duties in accordance with appropriate legal requirements, internal codes, rules and procedures, to comply with their relevant code of conduct and act at all times with honesty and probity in the discharge of their functions. Underpinning the codes of conduct are the seven principles of Public Life which are detailed in Appendix A1 of this document.
- 4.3 **Fraud, financial misconduct, serious and intentional breach of financial or contract procedure rules, theft, bribery or corruption is not acceptable and will not be tolerated.** Fraud covers all the relationships an individual may have with the Council and as such all cases of internal fraud will be referred for disciplinary investigation and will be treated as gross misconduct.
- 4.4 The Council's policy also encompasses external fraud and includes fraud perpetrated against the Council. This will include Council Tax Support, Council Tax discounts, Non-Domestic Rates, renovation grants, Business Support Grants, direct payments and student award frauds and includes the incorrect usage of any of the Council owned IT systems and those owned by a third party using council data.
- 4.5 All such cases will be reported for investigation either by the police or the Council's own investigation resources and considered for criminal prosecution or civil recovery.

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Anti- Fraud and Corruption Policy

5. Expected Standards of Behaviour

- 5.1 The Council expects all elected members, employees, consultants, contractors, service users and any other external and partner organisations to uphold the highest standards of honesty and integrity.
- 5.2 Elected members and staff at all levels should be aware of their respective roles in preventing and detecting fraud and lead by example in ensuring adherence to rules, procedures, codes of conduct and recommended practices.
- 5.3 The Council supports and promotes zero tolerance to any form of theft, fraud, bribery or corruption and will pursue perpetrators to the full extent of the law.
- 5.4 Our strategy to reduce fraud is based on prevention, deterrence, detection, investigation, sanctions and redress within an over-riding anti-fraud culture. We will promote this culture across all our service areas and within the community as a whole.

6. Prevention

- 6.1 The responsibilities of various parties in relation to managing the risk of fraud and corruption are detailed below and summarised at Appendix A2.

6.2 Responsibilities of Elected Members

Elected members have a responsibility for approving major policies on the use of the Council's physical, financial and human resources and participating in the governance and management of the Council.

All elected members should be familiar with the Anti-Fraud and Corruption Policy and support its application in all activities, in order to help maintain a culture which will not tolerate fraud or corruption.

At all times, elected members must maintain the highest standards of conduct and ethics as the public would expect of their elected representatives and observe the Councillor Code of Conduct.

6.3 Responsibilities of the Accounts and Audit Committee

The role of the Council's Accounts and Audit Committee in relation to fraud and corruption includes: -

- Reviewing and ensuring the adequacy of the organisation's Anti-Fraud and Corruption Strategy and Policy documents and to consider the effectiveness of the arrangements for counter fraud and whistleblowing;

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- Reviewing and ensuring that adequate arrangements are established and operating to deal with situations of suspected or actual fraud and corruption;
- Reviewing the annual Internal Audit work programme to consider the proposed and actual Internal Audit coverage and whether this provides adequate assurance on the main business risks;
- Receiving and considering the Council's Annual Governance Statement.

6.4 Responsibilities of Management

It is acknowledged that fraud may be committed from within the organisation. The responsibility for managing the risk of fraud and corruption lies with management. Management includes all of the Council's directors, heads of service, managers, line managers and supervisors. These are all responsible for establishing and maintaining sound systems of internal control in all of their service's operations to prevent and detect fraud, bribery, corruption and theft.

Management must promote staff awareness of the risk of fraud and corruption and ensure that all suspected or reported irregularities are immediately referred in accordance with the Fraud Response Plan.

Where fraud or corruption has occurred because of a breakdown in the systems or procedures in place, management must ensure that appropriate improvements in systems of control are implemented to prevent a reoccurrence.

Managers must ensure that awareness is raised about the need to register interests and to include in the Register of Gifts and Hospitality any gifts or hospitality. They should also ensure that compliance with procedures is maintained in accordance with the Code of Conduct for Employees.

6.5 Responsibilities of All Employees

The Council expects all elected members and employees, to act with integrity, and to carry out their duties in accordance with appropriate legal requirements, internal codes, rules and procedures and to act at all times with honesty and probity in the discharge of their functions. All employees are expected to give the highest possible standard of service and to act with propriety in the use of public funds.

Employees are required to avoid activity that breaches this policy and must: -

- Ensure that they read and comply with this policy;
- Report suspicions of theft, fraud, serious and intentional breaches of financial regulations, bribery or corruption;

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Anti- Fraud and Corruption Policy

- Comply with the Council's 'Code of Conduct for Employees'. The code specifically requires that all offers of gifts, hospitality, and potential conflicts of interest are declared.

6.6 Responsibilities of Suppliers, Contractors, Consultants, Agency workers, Public and Partner Organisations

All outside individuals, including suppliers, contractors, consultants, agency workers, public and partner organisations are expected to conduct themselves towards the Council with honesty and integrity, and not do anything that involves fraud or corruption.

All those working on behalf of the Council must be aware of procedures to be followed if they suspect that fraudulent or corrupt acts have been committed and must report their concerns.

6.7 Role of Internal Audit

Internal audit provides an independent and objective opinion to the organisation on the overall adequacy and effectiveness of the organisation's framework of governance, risk management and control. Internal audit work, undertaken by the Audit and Assurance Service, in reviewing the standard of internal control assists management to fulfil their responsibilities in preventing incidents of fraud and corruption.

The Internal Audit team works with the Counter Fraud team in developing and reviewing the Anti- Fraud and Corruption Strategy and, where appropriate, by investigating issues reported under the Fraud Response Plan or the Whistleblowing Policy (Confidential Reporting Code) where fraud is suspected.

6.8 Role of External Audit

As part of planning and performing their audit work, the Authority's external auditor is responsible for obtaining reasonable assurance that the financial statements are free from material misstatement due to fraud or error.

6.9 Role of Counter Fraud Team

The Counter Fraud team is a dedicated unit which has been established to investigate potential irregularities in relation to a number of different areas administered by the authority. This includes categories such as Council Tax, Non-Domestic Rates, Business Support Grants & Direct Payments. The team works in liaison with other services to review and develop the Council's Anti-Fraud and Corruption Strategy.

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Anti- Fraud and Corruption Policy

7. Deterrence

7.1 The Council is committed to maintaining a culture which will not tolerate theft, fraud, bribery or corruption within the organisation and will deal swiftly and firmly with any persons who defraud or attempt to defraud the Council, or who are corrupt. Such action may include: -

- Disciplinary action;
- Prosecution;
- Recovery of financial loss;
- Publicising successful prosecutions and recoveries.

7.2 Disciplinary Action

All cases of fraud, bribery corruption or theft from within the organisation, will be referred for disciplinary investigation and will be treated as gross misconduct.

If any allegations are made maliciously or for personal gain, disciplinary action may be taken against the person making the malicious allegation.

Any elected member found to have acted fraudulently or corruptly will also face action. Where appropriate, the Council's Monitoring Officer will be consulted about the action to be taken.

7.3 Prosecution

Where sufficient evidence exists to suggest that a criminal offence may have been committed, it is the policy of the Council to refer the matter for prosecution and seek the recovery of losses incurred.

7.4 Recovery of financial loss

The Council will seek to recover any financial loss incurred as a result of fraudulent activity.

The Council is committed to taking further appropriate action against fraudulent claims submitted for financial assistance in relation to any service which the Council delivers such as Council Tax, Non-Domestic Rates and Social Care. Consideration will be given to either prosecuting or applying alternative sanctions where it is considered appropriate to do so, in accordance with the Council's prosecution policy.

Disciplinary action will be taken in all cases where employees are found to have either made or participated in the making of fraudulent applications to this or any other public body.

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7.5 Publicising Successful Prosecutions and Recoveries

The Council's Communications Team will liaise with the press to publicise any anti-fraud and corruption initiatives undertaken by the Council.

Successful prosecutions of perpetrators of theft, fraud bribery or corruption will be publicised as appropriate. The Council will also publicise any action taken to recover the proceeds of fraudulent activity without the need for prosecution.

8. Detection

8.1 The Role of Management

Management must ensure that an effective system of internal control is in place. Controls in place should be adequately documented and implemented. It is the responsibility of management to ensure that appropriate controls are established and that the operation of all controls is kept under review.

8.2 Reporting Suspected Incidents of Fraud or Corruption

All elected members and employees have a vital role in the detection of fraud and corruption and must be vigilant against the possibility of fraudulent and corrupt activity.

All suspicions of illegality, financial impropriety or breach of procedure should be reported in accordance with the requirements of the Fraud Response Plan.

The Council has a Whistleblowing Policy to give confidence to anyone who wishes to raise concerns. The policy provides a framework for reporting, investigating and following up such concerns in accordance with the Public Interest Disclosure Act 1998 (PIDA).

Where any person indicates that they wish to raise a concern in relation to suspected fraud, they should be referred to the contact details shown in the Fraud Response Plan for guidance on how to report their concerns in confidence. Contact details and guidance for reporting fraud are included on the Council website and reflected in the Fraud Response Plan included on the intranet. Any referrals received via these contact details will be allocated accordingly depending on the nature of the allegation received.

8.3 The Investigation of Incidents of Fraud or Corruption

The Council's Audit and Assurance Service and Counter Fraud and Enforcement Teams are responsible for receiving all referrals of suspected theft, fraud and corruption. Responsibility for conducting the investigation will depend on the nature of the alleged offence(s).

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Anti- Fraud and Corruption Policy

The relevant investigating team will liaise with other relevant services, to agree an appropriate approach to ensure that action is taken to research allegations of suspected fraud in accordance with this policy. Account will be taken of the particular circumstances of each case to ensure appropriate services are involved in the process. There will be liaison with Human Resources and other functions / individuals as necessary such as Legal Services, relevant service managers and other internal and/or external services.

Where theft, fraud or corruption has occurred, management will be advised about any recommended improvements to systems and procedures as appropriate.

The Council's Director of Finance and Systems (Section 151 Officer) will be informed of all incidents of fraud where it is alleged that the incident involves a member of staff, partner, contractor or councillor. Action for undertaking an investigation will be agreed in liaison with Human Resources in accordance with investigation processes set out as part of the Council's Disciplinary Policy.

8.4 Data Matching

Arrangements are in place, and will continue to be developed, which encourage the exchange of information between the Council and other agencies on national and local fraud and corruption activity. This includes participation in the National Fraud Initiative (NFI). All such arrangements will adhere to data protection legislation.

9. Sanctions and Redress

- 9.1 In all cases of theft, fraud, financial misconduct, serious and intentional breach of financial regulations or contract procedure rules, bribery or corruption committed by employees the Council will seek disciplinary action for gross misconduct. This includes fraud related to employment with the Council as well as other forms of engagement e.g. through applications for financial assistance made to the Council by employees or members.
- 9.2 Where evidence of fraud exists this will be reported to the Police or the Council's Legal Services where appropriate and considered for criminal prosecution, in line with the Prosecution Policy. Where a financial loss has been identified, the Council will seek to recover this loss either through civil or criminal processes.
- 9.3 The Council will seek prosecution in all cases involving theft from vulnerable clients or where there is evidence of bribery or corruption of public officials.

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Appendix A1 - The Seven Principles of Public Life

The Council expects all elected Members and employees, to act with integrity, and to carry out their duties in accordance with appropriate legal requirements, internal codes, rules and procedures and to act at all times with honesty and probity in the discharge of their functions.

All elected members and employees of Trafford Council are expected to comply with their relevant Code of Conduct. Underpinning the Codes of Conduct are the seven principles of public life: -

1. **Selflessness** — Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
2. **Integrity** — Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
3. **Objectivity** — In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
4. **Accountability** — Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
5. **Openness** — Holders of public office should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
6. **Honesty** — Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
7. **Leadership** — Holders of public office should promote and support these principles by leadership and example.

Appendix A2 – Roles and Responsibilities	
Stakeholder	Specific Responsibilities
Chief Executive	Ultimately accountable for the effectiveness of the Council's arrangements for countering fraud and corruption.
Monitoring Officer	To advise Councillors and employees on ethical issues, standards and powers to ensure that the Council operates within the law and statutory codes of practice.
Director of Finance and Systems	To ensure the Council has adequately resourced and effective counter fraud and internal audit functions.
Accounts and Audit Committee	To review and ensure the adequacy of the organisation's Anti – Fraud & Corruption Policy and Strategy and the effectiveness of their application throughout the authority. Review and ensure that adequate arrangements are established and operating to deal with situations of suspected or actual fraud and corruption.
Councillors	To support and promote the development of a strong counter fraud culture.
External Audit	To identify any risk of material misstatement (whether due to fraud or error) and to assess the authority's arrangements to secure economy, efficiency and effectiveness.
Internal Audit (Audit and Assurance Service)	To co-ordinate, in co-operation with the Counter Fraud Team and other services, maintenance of the Anti- Fraud and Corruption Strategy, Policy and supporting guidance. To independently review the Council's internal controls to assist management in reviewing and reducing the risks of fraud and corruption. To undertake fraud investigations and subsequent follow up work in accordance with the Council's Anti- Fraud & Corruption Strategy and Anti-Fraud & Corruption Policy.
Counter Fraud Team	To investigate suspected irregularities in relation to Council Tax, Non Domestic Rate Relief, Direct Payments, Business Support Grants and any other financial services that the Council administers. To work with Audit and Assurance and other services in maintaining the Council's Anti-Fraud and Corruption Strategy, Policy and supporting guidance.
Directors, Heads of Service, Managers and line managers	To lead by example. To promote staff awareness and ensure that all suspected or reported irregularities are immediately reported as required in the Council's Fraud Response Plan. To ensure that there are mechanisms in place to assess the risk of fraud, bribery, corruption and theft and to reduce these risks by implementing robust internal controls.

All employees of the Council	To comply with Council policies and procedures. To be aware of the possibility of fraud, bribery, corruption and theft, and to report any genuine concerns to the appropriate management.
Suppliers, Contractors, Consultants, Partners	To be aware of the possibility of fraud and corruption against the Council and report any genuine concerns or suspicions.
Standards Committee	To monitor and advise upon the content and requirement of codes, protocols and other procedures relating to standards of conduct throughout the Council.



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Fraud Response Plan

March 2023

Fraud Response Plan

1. Introduction

- 1.1 The purpose of this plan is to demonstrate and set out the procedures to be followed by employees where theft or fraud is suspected or detected. It is part of the Council's overall Anti-Fraud and Corruption Strategy. This plan applies to all employees as well as those contractors working for the Council on council premises, for example, agency staff, builders, drivers, independent consultants, trainees, and volunteers. It also covers suppliers and those providing services under a contract with the Council in their own premises.
- 1.2 Nothing in this plan detracts from the information contained within the Council's Whistleblowing Policy.

2. Reporting a suspected fraud

- 2.1 Suspicions of fraud will be treated seriously and will be reviewed and investigated in accordance with the Public Interest Disclosure Act, the Human Rights Act and the Council's fraud investigation procedures.
- 2.2 All suspicions of theft, fraud or corruption must be reported without delay by one of the following methods:
- Contact the Council's fraud reporting line: 0161 912 2228 /2373 /1839
 - Email : counterfraud@trafford.gov.uk
 - Complete and submit the online fraud reporting form [Reporting fraud \(trafford.gov.uk\)](https://trafford.gov.uk)
- 2.3 Details in relation to fraud reporting are also reflected in the Council's Whistleblowing Policy and associated guidance. Employees can contact the Audit and Assurance Service or the Counter Fraud and Enforcement Team for further advice on anti-fraud and corruption matters.
- 2.4 Employees unsure of whether or how to raise a concern or for those who may want confidential advice are advised to contact the independent charity, Protect (Formerly Public Concern at Work) Protect provides free confidential advice on how to raise a concern about serious malpractice at work. Their contact details are: -
- Telephone: 020 3317 2520
 - Web-site: <https://protect-advice.org.uk/>
- 2.5 This Fraud Response Plan is intended to provide employees with an avenue within the Council to raise concerns. If it is felt that the Council has not acted appropriately, the matter could be reported to one of the following possible contact points: -

- The Council's external auditor;
- One of the Council's recognised Trade Unions;
- Citizens' Advice Bureau;
- Relevant professional bodies or regulatory organisations such as the Health and Safety Executive and utility regulators;
- The police.

2.6 If the matter is reported to a person or body outside of the Council, care should be taken not to disclose confidential information.

3. Action by Managers/Heads of Service

3.1 Managers must take action to deal with suspicions of theft, fraud or corruption: Managers should: -

- Listen to the concerns raised by staff and treat every report received seriously and sensitively;
- Make sure that all concerns are given a fair hearing;
- Reassure staff that they will not suffer because they have raised suspicions. The Council will not tolerate any harassment or victimisation (including informal pressures) of anyone raising a genuine concern;
- Get as much information as possible, including any notes and any evidence that may support the allegation;
- Report the matter as outlined in 2.2 above of this document.
- **NOT** interfere with any evidence and make sure it is kept securely;
- **NOT** try to carry out an investigation. This may hinder any subsequent investigation action that may be taken

4. The Council's Response

4.1 The Council is committed to good practice and high standards and wants to be supportive of its employees. The Council recognises that deciding whether or not to report a concern can be very difficult.

4.2 In line with the Public Interest Disclosure Act 1998, if concerns are raised by an employee that they genuinely believe to be making in the public interest, it does not matter if these are not subsequently proved. They will not be at risk of losing their job or suffer from any form of retribution as a result. This assurance is not extended to anyone who maliciously raises a matter that they know to be false.

4.3 The Council will not tolerate any harassment or victimisation of anyone raising a genuine concern. All such acts of harassment or victimisation will be referred for disciplinary investigation. Where concerns are raised in confidence, the identity of the witness will not be disclosed without their consent unless required by law.

5. Fraud Investigation

- 5.1 The Council's Counter Fraud and Internal Audit Teams are responsible for receiving all referrals of suspected theft, fraud and corruption. Responsibility for conducting the investigation will depend on the nature of the alleged offence(s).
- 5.2 The relevant investigating team will liaise with other relevant services, to agree an appropriate approach to ensure that action is taken to research allegations of suspected fraud in accordance with this policy. Account will be taken of the particular circumstances of each case to ensure appropriate services are involved in the process. Liaison will take place with Human Resources and other functions / individuals as necessary such as Legal Services, relevant service managers and other internal and/or external services.
- 5.3 Where theft, fraud or corruption has occurred, management will be advised about any recommended improvements to systems and procedures as appropriate.

6. Disciplinary procedure

- 6.1 Cases of theft, fraud, bribery or corruption by employees will be referred for disciplinary investigation in accordance with the procedures set out in the Council's Disciplinary Policy and will be treated as gross misconduct.
- 6.2 Where sufficient evidence exists, this will be reported to the police in accordance with the Prosecution Policy.
- 6.3 Where there is evidence that an allegation of misconduct was made maliciously or for personal gain, disciplinary action will be taken against the person making the malicious allegation.

Appendix B1 – Anti-Fraud Guidance for Employees

1. What should I do if I think there is a fraud?

If you suspect theft, fraud, bribery or corruption within the workplace, there are a few simple guidelines that should be followed: -

Do make an immediate note of your concerns.

Note all relevant details, such as what was said in telephone or other conversations, the date, time and the names of anyone involved.

Do deal with the matter promptly.

Any delay may cause further problems

Do not be afraid of raising your concerns.

You do not have to be able to prove that your suspicions are correct. You will not suffer any recriminations as a result of raising a reasonably held suspicion, even if this turns out to be wrong.

Do report your suspicions.

2. Who should I contact?

Report your suspicions by one of the following methods:

- Contact the Council's fraud reporting line 0161 912 2228/2373/1839
- Or Email : counterfraud@trafford.gov.uk
- Complete and submit the online fraud reporting form [Reporting fraud \(trafford.gov.uk\)](#)

Further information is also detailed in the Council's Whistleblowing Policy and associated guidance.

3. I am still not sure whether I should report the issue.

If you are unsure whether or how to raise a concern or if you want confidential advice before contacting someone officially, then contact independent advisors Protect (Formerly Public Concern at Work) on 020 3317 2520 or via their website <https://protect-advice.org.uk/>

Protect is an independent charity that provides free advice for employees who wish to express concerns about fraud or other serious malpractice in the workplace.

4. Is there anything I should not do?

Do not approach the person / people or organisation you suspect.

Refer your concerns to the contacts indicated in Section 2.2 of this guidance or within the Council's Whistleblowing Policy.

Do not try to investigate the matter yourself.

Do not attempt to collect evidence or question anybody, but if you do have any documents etc. which you think are relevant, secure them safely.

Do not convey your suspicions to anyone other than those with the proper authority.

If you are unsure about what you have seen or heard, seek advice from the Audit and Assurance Service, Counter Fraud & Enforcement Team or Protect (Formerly Public Concern at Work).

5. I only think there is something wrong. I do not have any evidence. Will my information be treated seriously?

Yes it will.

We understand that reporting a concern can be very difficult and that you may not be sure that you are doing the right thing. Your information will be treated seriously and as far as possible, confidentially.

Your responsibility is to report your suspicions.

You do not need to prove that your suspicions are correct. You should not attempt to collect evidence. It does not matter if your suspicions turn out to be wrong, as long as you have acted in good faith and genuinely believe your suspicions to be true.

6. What protection is available for me if I do decide to report my suspicions?

The Council will not tolerate any harassment or victimisation of anyone raising a genuine concern. If you want to raise a concern in confidence and ask for your identity to be protected, it will not be disclosed without your consent unless required by law.

In addition, an Act of Parliament – the Public Interest Disclosure Act 1998 will protect you from any detriment as long as the disclosure is in the public interest and

- a) You disclose the information in good faith;
- b) You believe it to be substantially true;
- c) You do not act maliciously or make false allegations;
- d) You do not seek any personal gain.



TRAFFORD
COUNCIL

Anti-Money Laundering Policy and Procedures

November 2022

Version Control

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1.1	1 st November 2022	Mark Foster	

Anti-Money Laundering Policy and Procedures

Policy Statement

The Council takes its responsibility to protect the public purse very seriously and is fully committed to the highest ethical standards, in order to ensure the proper use and protection of public funds and assets. As part of that responsibility, this document sets out Trafford Council's policy and procedures in relation to money laundering.

This Anti-Money Laundering Policy and Procedures is supplementary to the Council's wider Anti-Fraud and Corruption Policy and Strategy which sets out the Council's position and planned actions to deal with suspected fraud, bribery, corruption and theft.

The policy and procedures applies to all employees and members of the Council and aims to maintain high standards of conduct by preventing criminal activity through money laundering. It sets out the processes that must be followed to enable the Council, its members and employees to fulfil the Council's intention to comply with Anti-Money Laundering Regulations.

1. Introduction

- 1.1 The Proceeds of Crime Act 2002 (as amended by the Serious Organised Crime and Police Act 2005), the Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001) and the Money Laundering Regulations 2017 impact on certain areas of local authority business and place obligations on the Council and its employees to establish and adhere to internal procedures to prevent the use of their services for money laundering. The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 (MLR 2019) came into effect from January 2020 building on the earlier Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017).

2. What is Money Laundering?

- 2.1 Money laundering is the term used for a number of offences involving the proceeds of crime or terrorism funds. The following constitute the act of money laundering:
- Concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of the 2002 Act); or
 - 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 (section 328); or
 - Acquiring, using or possessing criminal property (section 329);
 - Becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorist property (section 18 of the Terrorism Act 2000).
- 2.2 These are the primary money laundering offences and thus prohibited acts under the legislation. There are also two secondary offences: failure to disclose any of the primary offences and tipping off. Tipping off is where someone informs a person or people who are, or are suspected of being involved in money laundering, in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.
- 2.3 Potentially a member of staff 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. This Policy sets out how any concerns should be raised.
- 2.4 Money laundering is the process of channelling 'bad' money into 'good' money in order to hide the fact the money originated from criminal activity. Money laundering often occurs in three steps: first, cash is introduced into the financial system by some means ("placement"), the second involves a financial transaction in order to camouflage the illegal source ("layering"), and the final step entails acquiring wealth generated from the transactions of the illicit funds ("integration"). An

example is where illicit cash is used (placed) to pay for the annual non-domestic rates on a commercial premises (possibly also a large overpayment), and then within a very short time the property is vacated (layering). A refund is made to the individual from the Council, 'integrating' the source of the money.

- 2.5 Whilst the risk to the Council of contravening the legislation may be considered low, it is extremely important that all employees are familiar with their legal responsibilities: serious criminal sanctions may be imposed for breaches of the legislation. **A key requirement is for employees to promptly report any suspected money laundering activity to the Money Laundering Reporting Officer (MLRO).**

3. Scope of the Policy

- 3.1 This Policy applies to all employees of Trafford Council and aims to maintain high standards of conduct within the Council by preventing criminal activity through money laundering. The Policy sets out the procedures which must be followed (for example the reporting of suspicions of money laundering activity) to enable the Council to comply with its legal obligations.
- 3.2 The Policy should be considered alongside the Council's other documents governing counter fraud, including the Anti-Fraud and Corruption Strategy, Whistleblowing Policy, Employee Code of Conduct and Members' Code of Conduct.
- 3.3 Failure by a member of staff to comply with this Policy and the procedures may constitute a disciplinary offence.

4. What are the Obligations on the Council?

- 4.1 Not all of the Council's business is "relevant" for the purposes of the legislation. It is mainly accountancy and financial; and company and property transactions undertaken by Legal Services. However, the safest way to ensure compliance with the law is to apply it to all areas of work undertaken by the Council;
- 4.1 Organisations conducting "relevant business" must:
- appoint a Money Laundering Reporting Officer ("MLRO") to receive disclosures from employees of money laundering activity (their own or anyone else's);
 - implement a procedure to enable the reporting of suspicions of money laundering;
 - maintain client identification procedures in certain circumstances; and
 - maintain record keeping procedures.
- 4.3 Given the above, all staff are required to comply with the reporting procedure set out in section 6 below.

5. The Money Laundering Reporting Officer

- 5.1 The officer nominated to receive disclosures about money laundering activity within the Council is Dominique Sykes (Monitoring Officer), who can be contacted as follows:

Dominique Sykes, Director of Legal & Governance and Monitoring Officer
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH
Telephone: 0161 912 4215
Email: dominique.sykes@trafford.gov.uk

- 5.2 In the absence of the MLRO, Steven Boyle (as Deputy Monitoring Officer) is authorised to deputise and can be contacted as follows:

Emma Malpas
Head of Legal & Governance and Deputy Monitoring Officer
Legal and Governance Services
Trafford Town Hall
Talbot Road
Stretford
M32 0TH
Telephone: 0161 912 1836
Email: emma.malpas@trafford.gov.uk

6. Disclosure Procedure

Cash Payments

- 6.1 **No payment to the Council should automatically be accepted in cash (including notes, coins or travellers cheques in any currency) if it exceeds the equivalent of £5,000.00 per transaction or a series of transactions.** This does not, however, mean that cash transactions below this value will be valid and legal and should not arise any suspicion. Professional scepticism should remain at all times.
- 6.2 Staff who collect cash payments are asked to provide the details of any cash transaction over £5,000.00 to the MLRO so that precautionary checks can be performed. It is best practice to insist on payment by cheque or electronically from a UK clearing bank.
- 6.3 The Council, in the normal operation of its services, accept payments from individuals and organisations. If an employee has no reason to suspect or know that money laundering activity is taking/has taken place and if the money offered is less than £5,000.00 in cash as payment or part payment for services offered by the Authority then

there is no need to seek guidance from the MLRO. If a member of staff has reasonable grounds to suspect money laundering activities or proceeds of crime, or is simply suspicious, the matter should still be reported to the MLRO. If the money offered is £5,000.00 or more in cash then payment must not be accepted until guidance has been received from the MLRO.

7. Client Identification Procedure / Due Diligence

- 7.1 When dealing with financial transactions, employees must take steps to identify a citizen and check that they are who they say they are. This will mean obtaining identification documents.
- 7.2 Where the Council is carrying out **relevant business** (accountancy and financial functions, audit services and financial, company and property transactions of legal services) and:
- a) forms an ongoing business relationship with a client; or
 - b) carries out an occasional transaction in excess of £5,000.00; or
 - c) suspects money laundering or terrorist financing; or
 - d) doubts the reliability or adequacy of documents, data or information previously obtained for the purposes of identification or verification.

then the Client Identification Procedure must be followed before any business is undertaken for that client. **Please note that unlike the reporting procedure, the client identification procedure is restricted to those operating 'relevant business'.**

Any officer involved in a transaction of this kind should ensure that the person provides satisfactory evidence of their identity personally, through passport/photo driving licence plus one other document providing evidence of current address in the form of a bank statement, credit card statement, mortgage details or a utility bill. Where the other party is a company, this can be done evidenced through company registration certificate.

8. Reporting to the Money Laundering Reporting Officer (MLRO)

- 8.1 Any employee who becomes concerned that their involvement in a matter may amount to a prohibited act under the legislation must disclose this promptly to the MLRO or deputy. **The disclosure should be at the earliest opportunity of the information coming to your attention, not weeks or months later. Should you not do so, then you may be liable to prosecution.** The disclosure should be made to the MLRO or deputy using the proforma report (see Appendix 1).
- 8.2 The employee must follow any subsequent directions from the MLRO or deputy and must not make any further enquiries themselves into the matter. Additionally, they must not take any further steps in the transaction without authorisation from the MLRO or deputy.

- 8.3 The employee must not disclose or otherwise indicate their suspicions to the person(s) suspected of money laundering. They must not make others aware that a report has been made to the MLRO in case this results in the suspect becoming aware of the suspicion.

Consideration of the disclosure by the Money Laundering Reporting Officer

- 8.4 The MLRO or deputy must promptly evaluate any disclosure to determine whether it should be reported to the National Crime Agency (NCA).
- 8.5 The MLRO or deputy must, if they so determine, promptly report the matter to the NCA on their standard 'Suspicious Activity Report' (SAR) form and in the prescribed manner. Up to date forms can be downloaded from the NCA website at:
[https://www.ukci.u.gov.uk/\(osvifg55vxdphzrs40egnj45\)/saronline.aspx](https://www.ukci.u.gov.uk/(osvifg55vxdphzrs40egnj45)/saronline.aspx)
(a direct link to the NCA's electronic SAR referral form)

<https://www.gov.uk/guidance/money-laundering-regulations-report-suspicious-activities> #how-to-submit-a-suspicious-activity-report
(general advice on the referral process).
- 8.6 All disclosure reports referred to the MLRO or deputy and reports made to the NCA must be retained by the MLRO in a confidential file kept for that purpose, for a minimum of five years. The Money Laundering Disclosure Form (Appendix 2) should be used by the MLRO to facilitate the recording of any action taken.
- 8.7 The MLRO or deputy will commit a criminal offence if they know or suspect, or have reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and they do not disclose this as soon as practicable to the NCA.

9. Record-Keeping

- 9.1 The MLRO must keep a record of all referrals made to him or her and of any action taken / not taken. The precise nature of these records is not set down in law but should be capable of providing an audit trail during any subsequent investigation.

10. Guidance / Awareness

- 10.1 In support of this policy, the Council will make staff aware of the requirements and obligations placed on the Council and on themselves as individuals by the anti-money laundering legislation.

10.2 It is not possible to give a definitive list of ways in which to spot money laundering but facts which tend to suggest that something unusual is happening may be sufficient for a reasonable suspicion of money laundering to arise. Whilst not exhaustive, the list below sets out some of the warning signs which *may*, either alone or cumulatively with other factors, suggest the possibility of potential money laundering activity:

Risk factors

- A new customer with no previous history with the Council;
- A secretive customer: for example one who refuses to provide requested information without a reasonable explanation;
- Concerns about the honesty, integrity or identity of a customer;
- Illogical third party transactions: for example unnecessary routing or receipt of funds from third parties or through third party accounts;
- Involvement of an unconnected third party without logical reason or explanation;
- Payment of a substantial sum in cash, which is over £5,000.00 per transaction or a series of transactions.
- Overpayments by a customer;
- Absence of an obvious legitimate source of the funds;
- Movement of funds to and from overseas;
- Where, without reasonable explanation, the size, nature and frequency of transactions or instructions is out of line with normal expectations;
- Cancellation or reversal of an earlier transaction.

11. Receiving Donations

The Council has the power to receive donations under section 139 of the Local Government Act 1972. Donations and gifts represent a risk for the potential masking of money laundering and or proceeds of crime. Gifts and donations that are in excess of £5,000.00 must be subjected to a due diligence exercise, which will include;

- i. The identification of the donor
- ii. The potential motive of the donor
- iii. The actual source of the donation
- iv. What the impact of the donation may potentially be on any one or more projects, on future procurements or on any future decision within the Council.

This due diligence exercise must be recorded and the record must be maintained. Prior to the decision being made to accept or not to accept the donation, the MLRO shall be shown the evidence of the due diligence exercise, a summary of what the donation is, who the beneficiaries will be, the reasons as to why it is being recommended that the donation be accepted.

Potential donations where the donor imposes one or more of the following conditions are particularly high risk and shall not be accepted:

- i The donor wants to remain anonymous and wants to maintain anonymity

- ii The donation is given with conditions, e.g. that that the Council pays back a certain fraction of it to a given account or entity or that the donor has a say in an intended project or on-going project

12. Further Information

12.1 Further information can be obtained from the MLRO and the following sources:

- Proceeds of Crime Act 2002 (as amended by the Serious Organised Crime and Police Act 2005)
- Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001)
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017)
- Money Laundering and Terrorist Financing (Amendment) Regulations 2019
- National Crime Agency (NCA) <http://www.nationalcrimeagency.gov.uk/>
- CIPFA <http://www.cipfa.org/members/members-in-practice/anti-money-laundering>
- The Law Society - Anti-Money Laundering Guidance and Advice www.lawsociety.org.uk/advice/anti-money-laundering/

13. Policy Review

13.1 The Monitoring Officer in liaison with Finance Services will ensure the continuous review and amendment of this policy document, to ensure that it remains compliant with good practice national public sector standards, primarily CIPFA's Code of Practice on Managing the Risk of Fraud and Corruption and the Local Government Fraud Strategy – Fighting Fraud Locally, and meets the needs of Trafford Council in managing associated risks.

14. Appendices

Appendix 1 – Report to Money Laundering Reporting Officer (MLRO)

Appendix 2 - Money Laundering Disclosure Form (pro-forma for use by MLRO)

CONFIDENTIAL

**REPORT TO MONEY LAUNDERING REPORTING OFFICER
re Money Laundering Activity**

To: Money Laundering Reporting Officer

From:
[insert name of employee]

Service Area:
.....
[insert post title and Service]

Ext/Tel No:

DETAILS OF SUSPECTED OFFENCE

Name(s) and address(es) of person(s) involved:
[if a company/public body please include details of nature of business]

Nature, value and timing of activity involved:
[Please include full details eg what, when, where, how. Continue on a separate sheet if necessary]

Nature of suspicions regarding such activity:

[Please continue on a separate sheet if necessary]

Has any investigation been undertaken (as far as you are aware)? Yes No

Yes No

[Please tick the relevant box]

If yes, please include details below:

Empty box for providing details of investigation.

Have you discussed your suspicions with anyone else?)? No Yes
[Please tick the relevant box]

If yes, please specify below, explaining why such discussion was necessary:

Have you consulted any supervisory body guidance re No Yes
money laundering? (e.g. the Law Society)
[Please tick the relevant box]

If yes, please specify below:

Do you feel there is any reason why you believe this should not No Yes
be disclosed to the National Crime Authority (NCA)?
[Please tick the relevant box]

If yes, please set out full details below:

Please set out below any other information you feel is relevant:

Signed:.....
Dated:.....

Please do not discuss the content of this report with anyone else and especially anyone you believe to be involved in the suspected money laundering activity described.

MONEY LAUNDERING DISCLOSURE FORM

THE FOLLOWING PART OF THIS FORM IS FOR COMPLETION BY THE MLRO

Date report received:
.....

Date receipt of report acknowledged:
.....

CONSIDERATION OF DISCLOSURE:

Action Plan:

OUTCOME OF CONSIDERATION OF DISCLOSURE:

Are there reasonable grounds for suspecting money laundering activity?

If there are reasonable grounds for suspicion, will a report be No Yes
made to the NCA?
[Please tick the relevant box]

If yes, please confirm date of report to the NCA:
.....
and complete the box below:

Details of liaison with the NCA regarding the report:

Notice Period: to

Moratorium Period: to

Is consent required from the NCA to any ongoing or imminent No Yes
transactions which would otherwise be prohibited acts?
[Please tick relevant box]

If yes, please confirm full details in the box below:

.....

Date consent received from NCA:

Date consent given by you to employee:

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to the NCA, please set out below the reason(s) for non-disclosure:

[Please set out any reasonable excuse for non-disclosure]

Date consent given by you to employee for any prohibited act transactions to proceed:

Other relevant information:

Signed:.....

Dated:.....

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS