



## **Anti-Money Laundering Policy**

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## 1.0 INTRODUCTION

- 1.1 ~~The Proceeds of Crime 2002 Act, the Terrorist Act 2000 and the Money Laundering Regulations 2007 broadly define money laundering and the range of activities covered by the statutory framework. Obligations impact on certain areas of local authority business and require local authorities to establish internal procedures to prevent the use of their services for money laundering. It is, therefore, good practice to have a robust Policy in place and promote staff awareness of potential money laundering activity.~~ The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) regulations (MLR 2017) came into force on 26 June 2017. They implement the EU's 4<sup>th</sup> Directive on Money Laundering. In doing so, they replace the Money Laundering regulations 2007 (MLR 2007) and the Transfer of Funds (Information on the Payer) regulations 2007, which were previously in force.
- 1.2 A key difference in the MLR 2017 is to require “relevant persons” to adopt a more risk-based approach towards anti-money laundering, in particular in how they conduct due diligence. Determining the appropriate level of due diligence requires analysis of risk factors based on the EU Directive and which are set out in MLR 2017.

## 2.0 SCOPE OF THE POLICY

- 2.1 This Policy applies to all employees of the Council whether permanent or temporary and Members of the Council. ~~and~~ It aims to maintain the high standards of conduct which currently exist within the Council by preventing criminal activity through money laundering. The Policy sets out the procedures that must be followed (for example the reporting of suspicions of money laundering activity) to enable the Council and its officers to comply with their legal obligations.
- 2.2 ~~Further information is set out in the accompanying Anti-Money Laundering Guidance Note and Procedures. Both~~ This Policy sits alongside the Council's Whistleblowing Code and Anti-Fraud, Bribery and Corruption Policy.
- 2.3 Failure by a member of staff to comply with the procedures set out in this Policy may result in disciplinary action. Any disciplinary action will be dealt with in accordance with the Council's Disciplinary ~~Policy Policies~~ and Procedures. It should also be noted that in certain instances officers might themselves become criminally liable for breach of ~~the 2000 Act, 2002 Act and the 2007 Regulation~~ the MLR 2017.

## 3.0 WHAT IS MONEY LAUNDERING?

- 3.1 Money Laundering is defined as the integrating of “dirty money” (i.e. the proceeds of crime) into the mainstream economy. The objective of which is to legitimise the possession of such monies through circulation and this effectively leads to “clean” funds being received in exchange. Money laundering often involves three steps:
- Placement – cash is introduced into the financial system by some means;
  - Layering – a financial transaction to camouflage the illegal source;
  - Integration – acquisition of financial wealth from the transaction of the illicit funds.
- 3.2 Money laundering is also the term used for a number of offences involving the proceeds of crime or terrorism funds. The following are primary money laundering offences defined under the Proceeds of Crime Act 2002 (POCA 2002) and are thus prohibited acts under the law:

- concealing, disguising, converting, transferring criminal property or removing it from the UK; 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; or
- acquiring, using or possessing criminal property.

### 3.3 There are also two secondary offences and thus prohibited acts under the legislation:

- Failure to disclose any of the primary offences and:
- Tipping off - 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 them being investigated or prejudicing an investigation.

~~These are the primary money laundering offences and thus prohibited acts under the law:~~

~~concealing, disguising, converting, transferring criminal property or removing it from the UK; 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; or~~

~~acquiring, using or possessing criminal property; or~~

~~becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorist property.~~

~~-3.24 The broad definition of money laundering means that Potentially any 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. The Guidance Note and Procedures document gives practical examples. This Policy sets out how any concerns should be raised.~~

## 4.0 WHAT ARE THE OBLIGATIONS ~~ON~~ OF THE COUNCIL?

~~4.0 The law requires those organisations in the „regulated sector“ and conducting „relevant business“ to~~

- ~~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 and record keeping procedures.~~

4.12 Whilst Local Authorities are not directly covered by the requirements of the **Money Laundering Regulations 2017** (MLR 2017), guidance from finance and legal professions, including the Chartered Institute of Public Finance and Accounting (CIPFA), indicates that public service organisations should comply with the underlying spirit of the legislation and regulations and put in place appropriate and proportionate anti-money laundering safeguards and reporting arrangements.

4.23 The Regulations-MLR 2017 apply to “relevant persons” acting in the course of business carried out by them in the UK. Not all of the Council’s business is “relevant” for the purposes of the legislation. It is mainly accountancy and financial, company and property transactions. However, the safest way to ensure compliance with the law is to apply them to all areas of work undertaken by the Council. ~~therefore, all employees are required to comply with the reporting procedure set out in the policy.~~

~~It is considered that the Council does not fall within the regulated sector nor does it conduct relevant business. However it is good practice, and will aid the Council’s compliance with the wider requirements of the relevant legislation if it adopts policies and procedures which are in line with the requirements identified in the bullet points above.~~

4.34 ~~The law requires these organisations in the "regulated sector" and conducting "relevant business" to~~obligations on the Council are to establish and maintain appropriate and risk sensitive policies and procedures. Therefore the council 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 ~~and record keeping procedures;~~
- maintain record keeping procedures; and
- conduct money laundering and terrorist funding risk assessment and adopt appropriate controls.

4.4 ~~All staff employees~~ are required to comply with the reporting procedures set out in section 6 below to ensure consistency throughout the ~~organisation Council and~~ and avoid inadvertent offences being committed proper discharge of its obligations under the money laundering regime.

~~The following sections of this Policy provide further detail about the requirements listed in paragraph 4.1 to the extent that they are relevant to the Council.~~

## 5.0 THE MONEY LAUNDERING REPORTING OFFICER (MLRO)

5.1 The officer nominated to receive disclosures about money laundering activity within the Council is the MLRO, who can be contacted as follows:

Jacqui Pendleton  
Internal Audit Manager  
52 Derby Street  
Ormskirk  
L39 2DF

Email: [Jacqueline.pendleton@westlancs.gov.uk](mailto:Jacqueline.pendleton@westlancs.gov.uk)

Telephone: 01695 712603

5.2 In the absence of the MLRO, any suspicion of money laundering should be reported to the Deputy MLRO:

Adam Spicer,

Assistant Solicitor  
52 Derby Street  
Ormskirk  
L39 2DF

Email: [Adam.Spicer@westlancs.gov.uk](mailto:Adam.Spicer@westlancs.gov.uk)

Telephone: 01695 585042

~~The officer nominated to receive disclosures about money laundering activity within the Council is the Internal Audit Manager, Mike Coysh (MLRO) (i). He can be contacted as follows:~~

~~Mike Coysh  
Internal Audit Manager  
52 Derby Street  
Ormskirk  
L39 2DF~~

~~Telephone: 01695 712603 (internal 2603)~~

~~5.2 — In the absence of the MLRO, the Assistant Solicitor, Michael Hynes, is authorised to deputise for him. He can be contacted at the 52 Derby Street offices address or on extension 5522.~~

## **6.0— DISCLOSURE PROCEDURE**

### **Reporting to the Money Laundering Reporting Officer**

- 6.1 Where you know or suspect that money laundering activity is taking/has taken place, or become concerned that your involvement in a matter may amount to a prohibited act under the legislation, you must disclose this as soon as practicable to the MLRO. The disclosure should be within “hours” of the information coming to your attention, not weeks or months later.
- 6.2 Your disclosure should be made to the MLRO using the proforma report set out in ~~the~~ Guidance Notes and Procedures Appendix A. The report must include as much detail as possible, for example:
- As much detail as known about the people involved, e.g. name, date of birth, address, company names, directorships, phone numbers, etc.;
  - Full details of the nature of their/your involvement;
    - ✓ If you are concerned that your involvement in the transaction would amount to a prohibited act under the POCA 2002, then your report must include all relevant details, as you will need consent from the National Crime Agency (NCA), via the MLRO, to take any further part in the transaction - this is the case even if the client gives instructions for the matter to proceed before such consent is given.
    - ✓ You should therefore make it clear in the report if such consent is required and clarify whether there are any deadlines for giving such consent, e.g. a completion date or court deadline;
  - The types of money laundering activity involved:
    - ✓ if possible, cite the section number(s) under which the report is being made;
  - The dates of such activities, including:

- ✓ Whether the transactions have happened, are ongoing or are imminent;
  - ✓ Where they took place;
  - ✓ How they were undertaken;
  - ✓ The (likely) amount of money/assets involved;
  - ✓ Why, exactly, you are suspicious – NCA will require full reasons;
- ~~along with~~ Any other available information to enable the MLRO to make a sound judgement as to whether there are reasonable grounds for knowledge or suspicion of money laundering and to enable ~~him to prepare his report~~ the preparation of a report to NCA, where appropriate. You should also enclose copies of any relevant supporting documentation.

6.3 Once you have reported the matter to the MLRO you must follow any directions ~~he may give~~ to you. **You must NOT make any further enquiries into the matter yourself:** any necessary investigation will be undertaken by NCA. Simply report your suspicions to the MLRO who will refer the matter on to NCA if appropriate. All members of staff will be required to co-operate with the MLRO and the authorities during any subsequent money laundering investigation.

6.4 Similarly, **at no time and under no circumstances should you voice any suspicions** to the person(s) whom you suspect of money laundering, even if NCA has given consent to a particular transaction proceeding, without the specific consent of the MLRO. Even saying "I can't tell you" may infer "tip off". Advice may be sought from the MLRO if any uncertainty remains regarding how to proceed in such a situation. If and when the MLRO and/or the NCA give clearance individuals must proceed with the matter as if nothing had happened.

6.5 The MLR 2017 created a new criminal offence in that any person who recklessly makes a statement in the context of money laundering which is false or misleading commits an offence. Punishment is a fine and/or up to 2 years' imprisonment.

6.6 Do not, ~~therefore,~~ make any reference on a client file to a report having been made to the MLRO – should the client exercise their right to see the file, then such a note will obviously tip them off to the report having been made. The MLRO will keep the appropriate records in a confidential manner.

#### **Consideration of the disclosure by the Money Laundering Reporting Officer**

6.76 Upon receipt of a disclosure report, the MLRO must note the date of receipt ~~on his section of~~ the report and formally acknowledge receipt of it. ~~He should also~~ The MLRO will advise you of the timescale within which ~~he expects to respond to you~~ a response should be expected.

6.87 The MLRO will consider the report and any other available internal information ~~he~~ thinks deemed relevant e.g.:

- reviewing other transaction patterns and volumes;
- the length of any business relationship involved;
- the number of any one-off transactions and linked one-off transactions;
- any identification evidence held;

and undertake such other reasonable enquiries ~~he thinks~~ as appropriate in order to ensure that all available information is taken into account in deciding whether a report to NCA is required (such enquiries being made in such a way as to avoid any appearance of tipping off those involved). The MLRO may also need to discuss the report with you.



6.98 ~~Once~~ The MLRO ~~has~~ must evaluated the disclosure report and any other relevant information, ~~he must~~ and make a timely determination as to whether:

- there is actual or suspected money laundering taking place; or
- there are reasonable grounds to know or suspect that is the case; and
- whether ~~he consent from NCA~~ needs to seek consent from NCA for a particular transaction to proceed is required.

6.109 Where the MLRO does so conclude, then ~~he must disclose~~ the matter as soon as practicable must be disclosed to the NCA on their standard report form and in the prescribed manner, unless he has the MLRO has a reasonable excuse for non-disclosure to NCA (for example, if you are a lawyer and you wish to claim legal professional privilege for not disclosing the information).

6.110 Where the MLRO suspects money laundering but has a reasonable excuse for non-disclosure, then ~~he must note the report accordingly~~ then the report should be marked accordingly; he the MLRO can then immediately give ~~his~~ consent for any ongoing or imminent transactions to proceed.

6.124 In cases where legal professional privilege may apply, the MLRO must liaise with the legal adviser to decide whether there is a reasonable excuse for not reporting the matter to NCA.

6.123 Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until NCA has specifically given consent, or there is deemed consent through the expiration of the relevant time limits without objection from NCA.

6.134 Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then ~~he shall mark the report accordingly~~ the report will be marked accordingly and consent given for and give ~~his consent for~~ any ongoing or imminent transaction(s) to proceed.

6.145 All disclosure reports referred to the MLRO and reports made ~~by him~~ to the NCA must be retained by the MLRO in a confidential file kept for that purpose, for a minimum of five years.

6.16 The MLRO or deputy will commit a criminal offence if they know, 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 possible to the NCA.

## 7.0 CUSTOMER DUE DILIGENCE

7.1 Where the Council is carrying out certain regulated business (accountancy, audit and tax services and legal services regarding financial, company or property transactions) and as part of this,

- a) forms an ongoing business relationship with a customer; or
- b) undertakes a one-off or occasional transaction amounting to €15,000 (£13,330 approx) or more whether carried out as a single transaction or several linked ones; or

c) suspects money laundering or terrorist financing,

then the Customer Due Diligence procedure must be followed before any business is undertaken for that customer.

7.2 Customer due diligence means:

- identifying the customer and verifying the customer's identity based on information obtained from a reliable and independent source (e.g. conducting a search at Companies House);
- obtaining information on the purpose and intended nature of the business relationship.

7.3 Customer due diligence is set out quite clearly in the link below and relates to **all** customers:

<https://www.gov.uk/guidance/money-laundering-regulations-your-responsibilities>

7.4 The requirement for customer due diligence applies immediately for new customers and should be considered on a risk sensitive basis for existing customers. Customer due diligence means that the Council must know its clients and understand their businesses. This is so that the Council can know if there is suspicious activity that should be reported; clearly it is only by the Council knowing its customers and their businesses that it can recognise abnormal and possibly suspicious activity.

7.5 MLR 2017 requires that the Council identifies its customers and verifies that identity on the basis of documents, data or information obtained from a reliable source. Where there is a beneficial owner who is not a customer then the Council must identify that person and verify the identity and where the beneficial owner is a trust or similar then the Council must understand the nature of the control structure of that trust. Finally, the Council must obtain information on the purpose and intended nature of the business relationship. The MLR 2017 introduces the need for the Council to consider both customer and geographical risk factors in deciding what due diligence is appropriate.

7.6 The checks described in the paragraph above must generally be undertaken by the Council before it establishes a business relationship or carries out an occasional transaction, or if it suspects money laundering or terrorist funding or doubts the veracity of any information obtained for the purposes of identification or verification. However, the Council is not required to undertake these checks if its customer is another public authority, unless it suspects money laundering or terrorist funding.

7.7 The Council is also obliged to maintain ongoing monitoring of its business relationships which means it must scrutinise transactions throughout the course of the relationship to ensure that the transactions are consistent with the Council's knowledge of the customer and keep the information about the customer up-to-date.

### **Simplified Due Diligence**

7.8 Simplified Due Diligence is the lowest level of due diligence that can be completed on a customer. This is appropriate where there is little opportunity or risk of your services or customer becoming involved in money laundering or terrorist financing.

7.9 Where a customer is considered to be low risk (occupation; organisation; country; method of transacting; transaction value etc.) then Simplified Due Diligence can be completed. Identity

must still be confirmed but the ongoing requirements may be relaxed unless a change in circumstances occurs.

### **Enhanced Customer Due Diligence and Ongoing Monitoring**

7.10 It will, in certain circumstances, be necessary to undertake what is known in the regulations as Enhanced Customer Due Diligence. In summary, this will be necessary where:

- the customer has not been physically present for identification purposes; or
- in any other situation which, by its nature, can present a higher risk of money laundering or terrorist funding.

7.11 Where this applies, the Council will need to take adequate measures to compensate for the higher risk. For example, this will mean ensuring that the customer's identity is established by additional documents, data or information.

7.12 Similarly, where the Council is in an ongoing "business relationship" with a customer, the Regulations impose a special obligation to carry out ongoing monitoring. This means that the Council must: scrutinise transactions undertaken throughout the course of the relationship to make sure that these transactions are consistent with the Council's knowledge of the customer, his / her business and risk profile; and keep documents, data or information obtained for the purpose of applying Customer Due Diligence measures up-to-date.

### **Possible Signs of Money Laundering**

7.13 There are many indicators that alert us to conduct further enquiries to establish certain facts. The answers (or failure to answer) will either dispel the original suspicion that something may not be quite right or reinforce that suspicion or highlight new areas for investigation. Appendix B gives examples of possible signs of money laundering, this list is not exhaustive.

### **Record Keeping**

7.14 Employees who carry out due diligence checks must retain the identification evidence and details of the relevant transaction for that client for at least five years.

## **8.0 RISK MANAGEMENT & INTERNAL CONTROL**

8.1 The risk to the Council of contravening the anti-money laundering legislation will be assessed on a periodic basis and the adequacy and effectiveness of the Anti-Money Laundering Policy will be reviewed in light of such assessments.

8.2 The adequacy and effectiveness of, promotion of, and compliance by employees with, the documentation and procedures will also be monitored through the Council's Corporate Governance and Anti-Fraud Policy frameworks.

## CLIENT IDENTIFICATION PROCEDURE

7.1 — The client identification procedure — putting in place formal procedures for evidencing the identity of those they do business with under the 2007 regulations — is only required, under the regulations, by those engaging in specific areas of Council activity. It is essential, however, for all staff to ensure they are constantly alert to potentially suspicious circumstances, for example, situations where funds flow through the Council from a source with which it is unfamiliar.

7.2 — In particular, if the Council is forming a new business relationship, and/or is considering undertaking a significant one-off transaction, officers must ensure that their own service procedures satisfy the requirements of the Client Identification Procedure before any business is undertaken for that client. This will be especially true if the parties concerned are not physically present for identification purposes and to situations where they may be acting for absent third parties. Satisfactory evidence of the identity of the prospective client should be obtained beforehand. For advice on appropriate and acceptable identification documents and any record keeping requirements, contact the MLRO.

## 9.0 CONCLUSION

- 9.1 The legislative requirements concerning anti-money laundering procedures are lengthy and complex. This Policy has been written so as to enable the Council to meet the legal requirements in a way which is proportionate to the very low risk to the Council of contravening the legislation.
- 9.2 Should you have any concerns whatsoever regarding any transactions then you should contact the MLRO or Deputy MLRO immediately.

**APPENDIX A**



**WEST LANCASHIRE BOROUGH COUNCIL**

**STRICTLY PRIVATE & CONFIDENTIAL**

**Report to Money Laundering Reporting Officer**

**Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. To do so may constitute a tipping off offence which carried a maximum penalty of 5 years imprisonment.**

<b><u>Employee Details:</u></b>	
<u>Name</u>	
<u>Job Title</u>	
<u>Service/Department</u>	
<u>Telephone Number</u>	
<u>Email Address</u>	
<b><u>Details of Suspected Office</u></b>	
<u>Names and addresses of the persons involved (if a company, please include the nature of their business)</u>	
<u>Nature, value and timing of activity involved: (please include full details e.g. what, when, where, how)</u>	
<u>Nature of Suspicions:</u>	

<p><u>Has any investigation been undertaken (as far as you are aware)?</u>  <u>If yes, please include details below:</u></p>	<p><b>YES</b> <input type="checkbox"/>      <b>NO</b> <input type="checkbox"/></p>
<p><u>Have you discussed your suspicions with anyone else?</u>  <u>If Yes, please specify, explaining why such discussion was necessary:</u></p>	<p><b>YES</b> <input type="checkbox"/>      <b>NO</b> <input type="checkbox"/></p>
<p><u>Have you consulted any supervisory body for guidance regarding money laundering? (e.g. The Law Society). If yes, please provide further details</u></p>	<p><b>YES</b> <input type="checkbox"/>      <b>NO</b> <input type="checkbox"/></p>
<p><u>Please set out below any other information that you feel is relevant:</u></p>	
<p><u>Signed and dated (type name and date for electronic submissions)</u></p>	
<p><b>FOR COMPLETION BY THE MLRO</b></p>	
<p><u>Date Received and acknowledged:</u></p>	
<p><u>Are their reasonable grounds for suspecting money laundering?</u>   <u>If yes, please provide details and confirm date of report to National Crime Agency (NCA).</u></p>	<p><b>YES</b> <input type="checkbox"/>      <b>NO</b> <input type="checkbox"/></p>
<p><u>If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to the NCA, please provide the reason(s) for non-disclosure.</u></p>	
<p><u>Unique NCA case reference number:</u></p>	

<u>Date consent given to employee for transaction to proceed (if applicable)</u>	
<u>Other relevant information:</u>	
<u>Signed and Dated</u>	

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS

## APPENDIX B

### POSSIBLE SIGNS OF MONEY LAUNDERING

It is impossible to give a definitive list of ways in which to spot money laundering or how to decide whether to make a report to the MLRO. The following are types of risk factors which may, either alone or cumulatively with other factors, suggest the possibility of money laundering activity:

#### GENERAL

- A new client;
- A secretive client: e.g., refuses to provide requested information without a reasonable explanation;
- Concerns about the honesty, integrity, identity or location of a client;
- Illogical third party transactions: 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 (e.g. over £10,000);
- Overpayments by a client;
- Absence of an obvious legitimate source of the funds;
- Movement of funds overseas, particularly to a higher risk country or tax haven;
- Where, without reasonable explanation, the size, nature and frequency of transactions or instructions (or the size, location or type of a client) is out of line with normal expectations;
- A transaction without obvious legitimate purpose or which appears uneconomic, inefficient or irrational;
- The cancellation or reversal of an earlier transaction;
- Requests for release of client account details other than in the normal course of business;
- Companies and trusts: extensive use of corporate structures and trusts in circumstances where the client's needs are inconsistent with the use of such structures;
- Poor business records or internal accounting controls;
- A previous transaction for the same client which has been, or should have been, reported to the MLRO;

#### PROPERTY MATTERS

- Unusual property investment transactions if there is no apparent investment purpose or rationale;
- Instructions to receive and pay out money where there is no linked substantive property transaction involved (surrogate banking);
- Property transactions, funds received for deposits or prior to completion from an unexpected source or where instructions are given for settlement funds to be paid to an unexpected destination;

Facts which tend to suggest that something odd is happening may be sufficient for a reasonable suspicion of money laundering to arise.



In short, the money laundering offences apply to your own actions and to matters in which you become involved. If you become aware that your involvement in a matter may amount to money laundering under POCA 2002 then you must discuss it with the MLRO and not take any further action until you have received, through the MLRO, the consent of NCA. The failure to report money laundering obligations relate also to your knowledge or suspicions of others, through your work.

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