

WIRRAL COUNCIL

ANTI-MONEY LAUNDERING POLICY

1.0 INTRODUCTION

(The first paragraph has been removed)

- 1.1 *The legislation concerning money laundering (the Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering Regulations 2007) has broadened the definition of money laundering and increased the range of activities caught by the statutory framework. As a result, the Council has established a policy and internal procedures to prevent the use of their services for money laundering.*
- 1.2 The following policy is a good practice guide that should be followed by all Wirral Council employees, although certain areas of the policy will only apply to those employees operating 'regulated activities' ⁽¹⁾ (or relevant business) functions.

2.0 SCOPE OF THE POLICY

- 2.1 This Policy applies to all employees of the Council and 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 which must be followed (for example the reporting of suspicions of money laundering activity) to enable the Council to comply with its legal obligations.
- 2.2 The Policy sits alongside the Council's Anti-Fraud and Corruption Strategy including Whistle-blowing.
- 2.3 Failure by a member of staff to comply with the procedures set out in this Policy may lead to disciplinary action being taken against them. Any disciplinary action will be dealt with in accordance with the Council's Disciplinary Policy and Procedure.
- 2.4 Further information is set out in the accompanying Guidance Note.

3.0 WHAT IS MONEY LAUNDERING?

- 3.1 Money Laundering is the term used for a number of offences involving the integrating of "dirty money" (i.e. the proceeds of crime) into the mainstream economy. The objective is to legitimise the possession of such monies through circulation and this effectively leads to "clean" funds being received in exchange.

¹ "Regulated activity is defined as the provision 'by way of business' of: advice about tax affairs; accounting services; treasury management, investment or other financial services; audit services; legal services; estate agency; services involving the formation, operation or arrangement of a company or trust or; dealing in goods wherever a transaction involves a cash payment of €15,000 or more."

Types:

- Placement: the process of transferring the proceeds of crime into the financial system, either directly through the high cash business or through the purchase of high value goods, property or other assets;
- Layering: the process of separating the proceeds of crime from the criminal source by creating layers of financial transactions to disguise the audit trail and provide anonymity;
- Integration: the process of whereby the layered funds re-enter the financial system as normal funds.

In most cases, the success of money laundering depends upon the transaction looking normal. Consequently, funds are usually laundered as part of seemingly ordinary transactions.

3.2 *Money laundering now goes beyond the transformation of the proceeds of crime into apparently legitimate money/assets: it now covers a range of activities (which do not necessarily need to involve money or laundering) regarding the proceeds of crime. It is technically defined as any act constituting:*

- *An offence under sections 327 to 329 of the Proceeds of Crime Act 2002, i.e:*

The primary money laundering offences, which are:

- concealing, disguising, converting or transferring criminal property or removing it from the UK (section 327);
- 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);
- acquiring, using or possessing criminal property (section 329);

and even

- *an attempt, conspiracy or incitement to commit such an offence; or*
- *aiding, abetting, counselling or procuring such an offence; and*

In addition, money laundering offences include:

- *an offence under section 18 of the Terrorism Act 2000, namely becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of "terrorist property" ⁽²⁾ (See full details of offence in the offences table at Appendix C).*

3.3 Potentially any member of staff could be captured by the money laundering provisions if they suspect money laundering and become involved with it in some way or they are aware of another person's involvement in money laundering and fail to report it, whether they are involved or not. The Guidance Note gives practical examples. This Policy sets out how any concerns should be raised.

² "Terrorist Property" means money or other property which is likely to be used for the purposes or terrorism, proceeds of the commission of acts of terrorism, and acts carried out for the purposes of terrorism.

- 3.4 Whilst the risk to the Council of contravening the legislation is low, it is not impossible to fall into a money laundering trap unwittingly, **so it is extremely important that all employees are familiar with their legal responsibilities: Serious criminal sanctions may be imposed for breaches of the legislation.**

4.0 WHAT ARE THE OBLIGATIONS ON THE COUNCIL?

- 4.1 Organisations conducting “relevant business” must:

- appoint a Money Laundering Reporting Officer (“MLRO”) to receive disclosures from employees of money laundering or *terrorist financing activity* (their own or anyone else’s);
- implement a procedure to enable the reporting of suspicions of money laundering or *terrorist financing*;
- maintain customer due diligence identification procedures in certain circumstances; and
- maintain record keeping procedures;
- train staff accordingly.

- 4.2 Not all of the Council’s business is “relevant” for the purposes of the legislation. It is mainly the accountancy and audit services carried out by Financial Services. 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** staff are required to comply with the reporting procedure set out in section 7 below.

- 4.3 The following sections of this Policy provide further detail about the requirements listed in paragraph 4.1.

5.0 THE MONEY LAUNDERING REPORTING OFFICER

- 5.1 The officer nominated to receive disclosures about money laundering/*terrorist financing activity* within the Council is the Director of Finance, I. E. Coleman. He can be contacted as follows:

I. E. Coleman
Director of Finance
Wirral Council
Treasury Building
Cleveland Street
Birkenhead
CH41 6BU

Telephone: 0151 666 3056

- 5.2 In the absence of the MLRO, the Deputy Director of Finance, D. L. H. *Taylor-Smith*, is authorised to act as the Deputy Money Laundering Reporting Officer.

6.0 PROCEDURES

Cash payments

- 6.1 Usually for cash transactions, by way of custom and practice, banks, building societies and other financial institutions automatically report movement of £1,000 over to the Serious Organised Crime Agency (SOCA); so in order to avoid the Council being caught out by this reporting system and thus perceived to be at suspicion of assisting money laundering or *terrorist financing*, Wirral Council has implemented a new policy on the acceptance of cash. Identification will now be requested from all customers paying amounts over £1,000 in cash (see appendix A). **Any** transactions that appear suspicious must be reported to the MLRO. Remember SOCA is watching to see who doesn't report in a chain of events, waiting to pounce.
- 6.2 It's all about traceability. Consequently, cheques, large or small, coming in from UK clearing banks are easily traceable through the banking system, hence a shelf company paying a cheque to the Council for, say, £100,000 is traceable. An individual walking in with £1,005 cash to pay a debt is not necessarily traceable. Therefore best practice is to insist on payment by cheque or electronic transfer from a UK Clearing Bank: NOTHING overseas or offshore *should be accepted*.

7.0 DISCLOSURE PROCEDURE

Reporting to the Money Laundering Reporting Officer

- 7.1 Where you **know or suspect** that money laundering or *terrorist financing* activity is taking/has taken place, or become concerned that your involvement in a matter may amount to a prohibited act under sections 327 – 329 of the Act, 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. **SHOULD YOU NOT DO SO, THEN YOU MAY BE LIABLE TO PROSECUTION.** You MUST report in confidence and in private (see 7.4) - you must NOT ‘tip off’ anybody else or allow anybody else to see or hear what is happening - it is CONFIDENTIAL between you and the MLRO.

You may wish to consult your line manager before approaching the MLRO, but you must be aware that **both you and your line manager** would have to disclose a report to the MLRO individually. This is because it is not a defence to presume that a report to the MLRO has been made on your behalf. If you do not consult your line manager prior to making a report to the MLRO **you must not** discuss any aspect of the matter with your line manager or any other person without prior approval from the MLRO.

- 7.2 Your disclosure should be made to the MLRO using the pro-forma report attached at Appendix B, ensuring that it is either hand delivered or in an envelope marked ‘Private and Confidential for the attention of addressee only’. The report must include as much detail as possible, for example:

- Full details of the people involved (including yourself, if relevant);
- 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 sections 327 – 329 of the Act (see Appendix C, Offences Table), then your report must include all relevant details, as you will need consent from the “SOCA”, 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 eg 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 eg a principal money laundering offence under section 327 – 329 of the Act, or general reporting requirement under section 330 of the Act, or both (see Appendix C, Offences Table);
- 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 – the SOCA will require full reasons;

along with any other relevant 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 to SOCA, where appropriate.

- 7.3 Once you have reported the matter to the MLRO you must follow any directions they may give you. **You must NOT make any further enquiries into the matter yourself**, any necessary investigation will be undertaken by SOCA. Simply report your suspicions to the MLRO who will refer the matter on to SOCA if appropriate. All members of staff will be required to co-operate with the MLRO and the Authorities during any subsequent money laundering/*terrorist financing* investigation. You must not ‘form a committee’ to consider such a matter.
- 7.4 Similarly, **at no time and under no circumstances should you voice any suspicions** to the person(s) whom you suspect of money laundering or *terrorist financing*, even if SOCA has given consent to a particular transaction proceeding, otherwise you may commit a criminal offence of “tipping off” (see the Guidance Note for further details).
- 7.5 Even saying “I can’t tell you” may infer tip off. Even if an irate Councillor demands to be informed about the issue, you must remain steadfast and not even hint at what the problem might be. You may wish to seek advice from the MLRO if you are unsure about how to proceed in such a situation. If and when the MLRO and/or SOCA give clearance you must proceed with the matter as if nothing had happened.

- 7.6 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 would 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

- 7.7 Upon receipt of a disclosure report, the MLRO must note the date of receipt on their section of the report and acknowledge receipt of it. They should also advise you of the timescale within which they expect to respond to you.
- 7.8 The MLRO will consider the report and any other available internal information they think is relevant eg:
- 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 they think appropriate in order to ensure that all available information is taken into account in deciding whether a report to SOCA is required (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.

- 7.9 Once the MLRO has evaluated the disclosure report and any other relevant information, they must make a timely determination as to whether:
- there is actual or suspected money laundering/*terrorist financing* taking place; or
 - there are reasonable grounds to know or suspect that is the case; and
 - whether they need to seek consent from SOCA for a particular transaction to proceed.

- 7.10 Where the MLRO does so conclude, then they must disclose the matter as soon as practicable to SOCA on their **standard report form** and in the prescribed manner, unless they have a reasonable excuse for non-disclosure to SOCA (for example, if you are a lawyer and you wish to claim legal professional privilege for not disclosing the information). Up to date forms can be downloaded from the SOCA website at www.soca.gov.uk.

7.10.1 Where the MLRO considers no money laundering/*terrorist financing* is taking place or suspects money laundering or *terrorist financing* but has a reasonable excuse for non-disclosure, then they must note the report accordingly; they can then immediately give their consent for any ongoing or imminent transactions to proceed. Remember - it's better to disclose than not – “better safe than sorry”.

7.10.2 In cases where legal professional privilege may apply, the MLRO must liaise with the Head of Legal Services to decide whether there is a reasonable excuse for not reporting the matter to SOCA.

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

7.11 Where the MLRO concludes that there are no reasonable grounds to suspect money laundering/*terrorist financing* then they shall mark the report accordingly and give their consent for any ongoing or imminent transaction(s) to proceed.

7.12 All disclosure reports referred to the MLRO and reports made by them to SOCA must be retained by the MLRO in a confidential file kept for that purpose, *for at least 5 years from the end of the business relationship*.

7.13 **The MLRO commits 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/terrorist financing and they do not disclose this as soon as practicable to the SOCA (see Appendix C, Offences Table).**

8.0 CUSTOMER DUE DILIGENCE

8.1 Where the Council is carrying out certain 'regulated activities' then extra care needs to be taken to check the identity of the customer or client – this is known as carrying out Customer Due Diligence.

8.2 The Regulations regarding customer due diligence are detailed and complex, but there are some simple questions that will help you decide if it is necessary:

- Is the service a regulated activity ?
- Is the Council charging for the service i.e. is it 'by way of business'?
- Is the service being provided to a customer other than a UK public authority?

If the answer to any of these questions is **no** then you do not need to carry out customer due diligence

If the answer to all these questions is **yes** then you must carry out customer due diligence before any business is undertaken for that client. If you are unsure whether you need to carry out customer due diligence then you should contact the MLRO.

8.3 Where you need to carry out customer due diligence then you must seek evidence of identity, for example:

- checking with the customer's website to confirm their business address;
- conducting an on-line search via Companies House to confirm the nature and business of the customer and confirm the identities of any directors;
- seeking evidence from the key contact of their personal identity, for example their passport, and position within the organisation.

- 8.4 The requirement for Customer Due Diligence applies immediately for new customers and should be applied on a risk sensitive basis for existing customers. Ongoing Customer Due Diligence must also be carried out during the life of a business relationship but should be proportionate to the risk of money laundering and *terrorist funding*, based on the officer's knowledge of the customer and a regular scrutiny of the transactions involved.
- 8.5 If, at any time, you suspect that a client or customer for whom you are currently, or are planning to carry out a regulated activity is carrying out money laundering or *terrorist financing*, or has lied about their identity then you must report this to the MLRO.
- 8.6 In certain circumstances enhanced customer due diligence must be carried out for example where:
- The customer has not been physically present for identification
 - The customer is a politically exposed person ⁽³⁾
 - There is a beneficial owner who is not the customer – a beneficial owner is any individual who: holds more than 25% of the shares, voting rights or interest in a company, partnership or trust.
- 8.7 Enhanced customer due diligence could include any additional documentation, data or information that will confirm the customer's identity and / or the source of the funds to be used in the business relationship / transaction. If you believe that enhanced customer due diligence is required then you must consult the MLRO prior to carrying it out.

9.0 RECORD KEEPING PROCEDURES

- 9.1 Each unit of the Council conducting relevant business must maintain records of:

- Every customer due diligence record
- Details of all relevant transactions carried out for customers

for at least 5 years from the end of the business relationship. This is so that they may be used as evidence in any subsequent investigation by the Authorities into money laundering/*terrorist financing*.

- 9.2 An electronic copy of every customer due diligence record must be sent to the MLRO to meet the requirements of the Regulations and in case of inspection by the relevant supervising body.
- 9.3 The precise nature of the records is not prescribed by law. However they must be capable of providing an audit trail during any subsequent investigation, for example distinguishing the client and the relevant transaction and recording in what form any funds were received or paid. In practice, the business units of the Council will be routinely making records of work carried out for clients in the course of normal business and these should suffice in this regard.

³ A politically exposed person is an individual who at any time in the preceding year has held a prominent public function outside of the UK, and EU or international institution / body, their immediate family members or close associates.

10.0 GUIDANCE AND TRAINING

10.1 In support of the Policy and Procedure, the Council will:

- Make all staff aware of the requirements and obligations placed on the Council and on themselves as individuals by the anti-money laundering legislation; and
- Give targeted training to those most likely to encounter money laundering/*terrorist financing*.

11.0 CONCLUSION

11.1 The legislative requirements concerning anti-money laundering procedures are lengthy and complex. This Policy and Procedure have been written to enable the Council to meet the legal requirements in a way which is proportionate to the low risk to the Council of contravening the legislation.

11.2 Should you have any concerns whatsoever regarding any transactions then you should contact the MLRO or the Deputy MLRO.

12.0 MONITORING AND REVIEW OF COMPLIANCE

12.1 *It is the responsibility of all Chief Officers to undertake regular monitoring and review of their department's compliance with the Anti-Money Laundering Policy and Procedures and in particular to ensure that the procedure to be adopted is communicated to all staff.*

12.2 *It is essential that all employees are aware of the potential for criminal activity and terrorist financing activity to be concealed through Money Laundering.*

13.0 REVIEW OF THE POLICY

The Policy will be subject to regular review and audit and will be updated as and when required (see Appendix D)

VERIFICATION OF CUSTOMER IDENTITY

Verification of Customer Identity Checklist for client: Name: _____

NB: If you are receiving funds from a Council customer in any transaction above £1,000 cash, the identity of the customer must be checked.

All suspicions, regardless of amount, should be reported to the MLRO via the Money Laundering Reporting Form.

A. Evidence not obtained – reasons:

1. Customer previously identified in: Month _____ Year _____

2. Other – state reason fully _____

B. Evidence obtained to verify name and address:

(a) OK on their own

Full national passport	▶
Full national driving licence with photo	▶
Pension book	▶
Armed Forces ID Card	▶
Signed ID Card of employer known to you	▶

(b) OK with two of next group below

Young person NI card (under 18 only)	▶
Pensioner's travel pass	▶
Building Society passbook	▶
Credit Reference agency search	▶
National ID Card	▶
Copy Company Certificate of Incorporation if a limited company and 2 Directors personal identify as above	▶

(c) NB NOT suitable on their own

Gas, electricity, telephone bill	▶
Mortgage statement	▶
Council tax demand	▶
Bank/Building Society/credit card statement	▶
Young persons medical card (under 18 only)	▶
Home visit to applicants address	▶
Check of telephone directory	▶
Check electoral roll	▶
*Suitable for proof of address only	▶

NB BEST PRACTICE is to have one of Group (a) plus two of Group (c)

APPENDIX A

C. Evidence obtained for unquoted company or partnership:

Certificate of Incorporation or equivalent	▶
Certificate of Trade or equivalent	▶
Latest report and audited accounts	▶
Principal shareholder/partner) <i>NB Personal</i>	▶
Principal director) <i>ID</i>	▶

D. Disadvantaged Customers:

e.g. Confirmation of identity from Social Worker or
Bail Officer, Police, School, Courts etc ▶

E. If evidence not obtained for the reasons in A, do you have any suspicions regarding identity? _____

I confirm that I have seen the originals of the documents indicated above and have identified the above Customer(s)

Signed _____ **Date** _____

NB Wherever possible TAKE PHOTOCOPIES of the identification evidence and PUT ON FILE. Copies should be stamped to indicate a copy and signed to evidence sight of the original.

CONFIDENTIAL

MONEY LAUNDERING REPORT

re Money Laundering Activity

To: Money Laundering Reporting Officer

From:
[insert name of employee]

Directorate:
[insert post title and Business Unit]

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

[Please tick the relevant box]

If yes, please include details below:

APPENDIX B

Have you discussed your suspicions with anyone else?)?

☐

Yes

☐

No

[Please tick the relevant box]

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

Have you consulted any supervisory body guidance re money laundering? (e.g. the Law Society)

☐

Yes

☐

No

[Please tick the relevant box]

If yes, please specify below:

Do you feel you have a reasonable excuse for not disclosing the matter to the SOCA? (eg are you a lawyer and wish to claim legal professional privilege?)

☐

Yes

☐

No

[Please tick the relevant box]

If yes, please set out full details below:

APPENDIX B

**Are you involved in a transaction which might be a prohibited act under sections 327- 329 of the Act and which requires appropriate consent from the SOCA?
(see appendix C, Offences Table)**

[Please tick the relevant box]

☐ Yes ☐ No

If yes, please enclose details in the box 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. To do so may constitute a tipping off offence, which carries a maximum penalty of 5 years' imprisonment.

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?

APPENDIX B

If there are reasonable grounds for suspicion, will a report be made to the SOCA?

☐ Yes ☐ No

[Please tick the relevant box]

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

Details of liaison with the SOCA regarding the report:

Notice Period: to

Moratorium Period: to

Is consent required from the SOCA to any ongoing or imminent transactions which would otherwise be prohibited acts?

☐ Yes ☐ No

[Please tick relevant box]

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

Date consent received from SOCA:

Date consent given by you to employee:

APPENDIX B

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to the SOCA, 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 SECURELY FOR AT LEAST 5 YEARS FROM THE END OF THE BUSINESS RELATIONSHIP

Earliest disposal date:

OFFENCES TABLE

Section Reference	Offence	Definition
S327	Concealing Criminal Property	<p>A person commits an offence if they conceal, disguise, convert or transfer criminal property or if they remove criminal property from England, Wales, Scotland or Northern Ireland.</p> <p>This is punishable by a maximum term of imprisonment of 14 years at the Crown Court and an unlimited fine.</p> <p>At the Magistrates Court it is 6 months and £5,000 fine.</p>
S328	Arrangements	<p>This offence requires a person to become actively involved in some arrangement which helps someone else to get, keep, use or control the proceeds of a crime.</p> <p>The punishment is as for S327.</p>
S329	Acquisition, use and possession	<p>This offence is committed by anyone that has criminal proceeds in their possession provided they know or suspect that it represents the proceeds of a crime unless they paid 'adequate consideration' for it.</p> <p>Someone who pays less than the open market value is therefore guilty of the offence but someone who pays the full retail price, despite knowing or suspecting they are stolen goods is not guilty.</p> <p>The punishment is as for S327.</p>
S330	Failure to Disclose Offence: Regulated Sector	<p>This offence is committed by an employee of a business in the regulated sector who has knowledge or suspicion of another persons involvement in money laundering and does not make a report through the appropriate channels. Negligence is not a defence as the employee will be tried upon what they should have known given their experience, knowledge and training.</p> <p>This is punishable by a maximum term of imprisonment of 5 years and/or a fine.</p>

APPENDIX C

S331	Failure to Disclose Offence: Nominated Officers in the Regulated Sector	<p>This offence is committed by a nominated officer (MLRO) of a business in the regulated sector who has knowledge or suspicion of another persons involvement in money laundering and does not make a report through the appropriate channels without an acceptable excuse under the legislation. Negligence is not a defence as the nominated officer will be tried upon what they should have known given their experience, knowledge and training.</p> <p>This is punishable by a maximum term of imprisonment of 5 years and/or a fine.</p>
S332	Failure to Disclose Offence: Other Nominated Officers	<p>This offence is committed by a nominated officer (MLRO) of a business outside of the regulated sector who has knowledge or suspicion of another persons involvement in money laundering and does not make a report through the appropriate channels without an acceptable excuse under the legislation. The officer will be tried on what they knew or suspected not on what they might have been expected to know or suspect.</p> <p>This is punishable by a maximum term of imprisonment of 5 years and/or a fine.</p>
S333	Tipping Off Offence	<p>This offence is committed if an officer makes a disclosure which is likely to prejudice an investigation being carried out by a law enforcing authority, knowing that such an investigation is in motion.</p> <p>This is punishable by a maximum term of imprisonment of 5 years and/or a fine.</p>

APPENDIX D

Date	Review History
April 2006	Anti-Money Laundering Policy, Guidance Note and Briefing Note for Front Line Staff established.
April 2006	Anti-Money Laundering Policy approved by the Executive Board on 6 April 2006.
April 2008	Anti-Money Laundering Policy, Guidance and Briefing Note for Front Line Staff reviewed and updated to take account of revised Money Laundering Regulations which came into force on 15 December 2007.
May 2008	Revised Anti-Money Laundering Policy approved by Cabinet on 22 May 2008.
March 2010	Money Laundering Programme reviewed by Internal Audit.
November 2010	Policy reviewed and updated to take into account the recommendations made by Internal Audit. H:\Finance\IntAudit\NEWSTRUCTUREANTIFRAUD\moneyLaundering\Follow-up_Anti_Money_Laundering_2010-11\Luan's 2010-11 follow up work\Wirral Council Policy\Nov 2010 policy & guidance