

WIRRAL COUNCIL

AUDIT AND RISK MANAGEMENT COMMITTEE

30 JUNE 2011

SUBJECT:	ANTI MONEY LAUNDERING POLICY
WARD/S AFFECTED:	ALL
REPORT OF:	DIRECTOR OF FINANCE
RESPONSIBLE PORTFOLIO HOLDER:	COUNCILLOR ADRIAN JONES
KEY DECISION?	YES

1.0 EXECUTIVE SUMMARY

- 1.1. Following the publication of CIPFA guidance 'Combating Financial Crime: Further Guidance on Anti-money Laundering for Public Service Organisations (2009)', the Anti Money Laundering Policy has been updated.
- 1.2. A revised Anti Money Laundering Policy for the Council is attached at Appendix 1. The changes made to the existing policy are identified by the use of italics. The revised policy was agreed by the Cabinet on 2 June 2011.

2.0 RECOMMENDATIONS

- 2.1. That the revised Anti Money Laundering Policy be noted.
- 2.2. That the revised policy be promoted across the Council.

3.0 REASONS FOR RECOMMENDATIONS

- 3.1 To comply with best practice identified by CIPFA and the Society of Local Authority Chief Executives (SOLACE) in the "Delivering Good Governance in Local Government Framework" , the "Managing the Risk of Fraud – Actions to Counter Fraud and Corruption" publication and the CIPFA 'Combating Financial Crime: further Guidance on Anti Money Laundering for Public Service Organisations'
- 3.2 This Committee on 17 January 2011 resolved that future counter fraud developments should be reported to this Committee.

4.0 BACKGROUND AND KEY ISSUES

- 4.1 Council policies to manage fraud have been reviewed to confirm that they comply with current best practice and CIPFA/SOLACE guidance during an exercise undertaken to assess the effectiveness of the overall arrangements for managing the risk of fraud. This involved undertaking a detailed exercise to examine all counter fraud policies that the Council has in place and an evaluation against current best practice contained in the 'Managing the Risk of Fraud – Actions to Counter Fraud and Corruption' publication produced by CIPFA for Local Authorities.

- 4.2. The Anti-Money Laundering Policy was found to be in need of update to be compliant with the latest CIPFA guidance. The Policy now contains reference to officers' responsibilities under the Terrorism Act 2000 as amended, and includes reference to the responsibilities of Chief Officers to regularly review Departmental compliance with Money Laundering Processes.
- 4.3. A revised and updated Anti Money Laundering Policy has been prepared and is attached at Appendix 1.

5.0 RELEVANT RISKS

- 5.1 Failure of the Council to have adequate policies and procedures in place to protect itself against the significant threat posed by money laundering and a failure to be seen by its stakeholders to be complying with current best practice to reduce all threats to the Council in this area.

6.0 OTHER OPTIONS CONSIDERED

- 6.1 No other options considered.

7.0 CONSULTATION

- 7.1 CIPFA, the Society of Local Authority Chief Executives (SOLACE) and the Serious Organised Crime Agency (SOCA) have been consulted throughout the process regarding current best practice.

8.0 IMPLICATIONS FOR VOLUNTARY, COMMUNITY AND FAITH GROUPS

- 8.1 There are none arising from this report.

9.0 RESOURCE IMPLICATIONS: FINANCIAL; IT; STAFFING; AND ASSETS

- 9.1 There are none arising from this report.

10.0 LEGAL IMPLICATIONS

- 10.1 There are none arising from this report.

11.0 EQUALITIES IMPLICATIONS

- 11.1 There are none arising from this report.

12.0 CARBON REDUCTION IMPLICATIONS

- 12.1 There are none arising from this report.

13.0 PLANNING AND COMMUNITY SAFETY IMPLICATIONS

- 13.1 There are none arising from this report.

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APPENDICES

Anti Money Laundering Policy

REFERENCE MATERIAL

CIPFA / SOLACE Delivering Good Governance in Local Government Framework
CIPFA Managing the Risk of Fraud – Actions to Counter Fraud and Corruption
CIPFA 'Combating Financial Crime: Further Guidance on Anti-money Laundering for Public Service Organisations (2009)'

SUBJECT HISTORY (last 3 years)

Council Meeting	Date
Cabinet	2 June 2011