

# Crawley Borough Council

**Report to Cabinet  
23 November 2022**

## **Anti-Money Laundering Policy**

Report of the Head of Corporate Finance – **FIN/598**

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### **1. Purpose**

- 1.1 To request approval for the adoption of the Anti-Money Laundering Policy in Appendix A

### **2. Recommendations**

- 2.1 To the Cabinet

The Cabinet is recommended to:

- a) Approve the Anti-Money Laundering Policy (Appendix A) for adoption and subsequent publication.
- b) Delegate authority to the Head of Corporate Finance, in consultation with the Leader, to review and make minor amendments to the Anti-Money Laundering Policy as further changes to legislation and statutory guidance are introduced. (*Generic Delegation 7 will be used to enact this recommendation*).

### **3. Reasons for the Recommendations**

- 3.1 To fulfil the Council's duty to review and publish updated guidance relating to the Anti-Money Laundering Policy.

### **4. Background**

- 4.1 The Council takes its responsibilities to protect the public purse very seriously and is committed to the highest standards of openness and accountability in order to ensure the proper use and protection of public funds and assets.

### **5. Description of Issue to be resolved**

- 5.1 The last policy covering Money Laundering was the Anti-Money Laundering Policy August 2008 which was approved by the Audit and Governance Committee on 11 November 2008 ([FIN/163](#)).
- 5.2 A review was carried out in 2022 and a new Anti-Money Laundering Policy has been drafted to meet the Council's requirements.

### **6. Information & Analysis Supporting Recommendation**

- 6.1 The Policy is produced to ensure compliance with the Money Laundering and Terrorist Financing Regulations.
- 6.2 This Policy applies to all employees of the council and aims to maintain the high standards of conduct, which currently exists within the council preventing criminal

activity through money laundering. The Policy sets out the procedures which must be followed (reporting of suspicions of money laundering) to enable the Council and staff to comply with their legal obligations.

- 6.3 There are no significant changes in this policy and the content of this policy is standard and compliant with the relevant legislation. It is similar to equivalent documents at other local authorities.

## **7. Implications**

- 7.1 Staffing – There are no direct staffing implications associated with implementing the Anti-Money Laundering Policy
- 7.2 Financial – There are no financial implications associated with implementing the Anti-Money Laundering Policy.
- 7.3 Legal - There are no legal implications associated with implementing the Anti-Money Laundering Policy.
- 7.4 Equalities Impact Assessment. There are no impacts of note with implementing the Anti-Money Laundering Policy.

## **8. Background Papers**

Fraud Act 2006  
Bribery Act 2010  
Local Government Finance Act 1992  
Officer code of conduct  
Member's code of conduct  
Whistleblowing Policy  
Financial Procedure Rules  
Procurement Code  
Proceeds of Crime Act  
Employee Handbook  
Constitution of Crawley Borough Council

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