



**Corporate Policy &
Resources Committee**

Thursday, 16 April 2026

**Subject: Recommendation from JSCC: Review of the Anti Money
Laundering and Financial Crime Prevention Policy**

Report by:	Peter Davy Director of Finance and Assets (S151 Officer)
Contact Officer:	Peter Davy Director of Finance and Assets (S151 Officer) peter.davy@west-lindsey.gov.uk
Purpose / Summary:	To approve the revised policy which outlines the Council's approach to preventing and responding to anti money laundering and now incorporates the prevention of financial crime.

RECOMMENDATION(S):

- a) That Members accept the recommendation from the Joint Staff Consultative Committee, and the revised Anti-Money Laundering and Financial Crime Prevention Policy be approved.
- b) That minor housekeeping amendments be delegated to the Section 151 Officer following consultation with the Chairman of the JSCC and CP&R Committees.

IMPLICATIONS

Legal: The legal duties around money laundering and financial crime are detailed within the policy.

Financial: FIN/133/26/CPR/SL

There are no financial implications arising from this report. Low risk investigations can be carried out by Human Resources; medium risk investigations by the Monitoring Officer; and high-risk investigations by the Section 151 Officer, supported by external legal and/or specialist fraud investigation support. There is a necessary cost when engaging specialist external investigation resource.

Staffing: There are no staffing implications arising from this report. However, the report does make reference to key contacts for whistleblowing.

Equality and Diversity including Human Rights:

There are no implications arising from this report.

Data Protection Implications:

There are no implications arising from this report.

Climate Related Risks and Opportunities:

There are no implications arising from this report.

Section 17 Crime and Disorder Considerations:

There are no implications arising from this report.

Health Implications:

There are no implications arising from this report.

Title and Location of any Background Papers used in the preparation of this report :

Risk Assessment:

The Fraud Risk Assessment was provided to Members of the Governance and Audit Committee in July 2024.

Call in and Urgency:

Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

No

X

Key Decision:

A matter which affects two or more wards, or has significant financial implications

Yes

No

X

1. Background

- 1.1 This report recommends a revised Anti-Money Laundering and Financial Crime Prevention Policy, attached at appendix 1. The previous Anti Money Laundering Policy (appendix 2) has been in place for a number of years and, following an audit of the council's fraud policies and processes, a review of the existing policy was recommended.
- 1.2 Specifically, the associated management action arising from the audit was: **"The Council will combine the Prevention of Financial Crime Policy and the Anti-Money Laundering Policy, making it the Anti-Money Laundering and Financial Crime Prevention Policy"**. Section five of the revised policy details the prevention of financial crime.
- 1.3 Given the revisions required to the previous Anti Money Laundering Policy, the updated document is presented for adoption. This is a re-written document and will replace the existing policy. It will be subject to review and amendment in line with current protocols.
- 1.4 The revised policy provides a clear framework for the Council to undertake necessary, legal, and proportionate actions where evidence supports an investigation into an allegation of money laundering or financial crime, and sets out that the Council will seek to deal with cases brought to its attention.
- 1.5 The policy also sets out that the minimisation of money laundering and financial crime is essential to ensure that public resources are used for their intended purpose of providing services to local residents.
- 1.6 The policy details the Council's no tolerance stance to all forms of money laundering and financial crime, and references the policy framework with which our staff, contractors, members and suppliers must comply. Reporting mechanisms are also included.
- 1.7 Following the introduction of this revised policy, staff and member training will be provided, in addition to an update in our supplier terms and conditions.

2 Summary of Amendments to Revised and Updated Policy

- 2.1 Whilst the previous version of the Anti Money Laundering Policy is attached for information, the revised document incorporates a number of updates, amendments, and additional information. The key changes are detailed within the following table, however, as this is a re-written document, this is not an exhaustive list.

2.2 Table of amendments

Amendment	Report Section
Policy name change	Title page
Corporate branding and layout	Whole document
Record of review / approval	Page 2
Clearer definitions of fraud, corruption, theft, and bribery	Section 3
Details of relevant legislation updated	Section 4
Prevention of financial crime now included	Section 5
Removal of named individuals to make reference to role and title only	Section 7
Requirements for training and exchange of information with other organisations updated	Section 8
Removal of extraneous appendices	End of document

3. Recommendation

3.1 Following the recommendation from the JSCC, Members of the Corporate Policy and Resources Committee are asked to:

3.1.1 accept the recommendation from the Joint Staff Consultative Committee, and the revised Anti-Money Laundering and Financial Crime Prevention Policy be approved; and

3.1.2 that minor housekeeping amendments be delegated to the Section 151 Officer following consultation with the Chairman of the JSCC and CP&R Committees.