

Customer Due Diligence Pro-Forma

SECTION A: PRELIMINARY	
Name of customer	
Is this customer another public authority (e.g. a local authority)?	<i>If “Yes”, the due diligence measures below in Sections B and C do not need to be applied.</i>
Does the Authority suspect the customer of money laundering or terrorist financing?	<i>If “Yes”, the suspicion MUST always be reported to the MLRO immediately.</i>
SECTION B: DUE DILIGENCE MEASURES	
<p>These measures are to be applied where the Authority:</p> <ol style="list-style-type: none"> 1) establishes a business relationship with a customer¹; 2) carries out an occasional transaction²; 3) doubts the veracity or adequacy of documents, data or information previously obtained from the customer for the purposes of identification or verification. <p style="text-align: center;"><i>To apply the due diligence measures, please answer as fully as possible the questions below.</i></p>	
1.	Can the Authority identify this customer?
2.	How has the identity of this customer been established? ³ [Attach documents, data or information establishing identity]
3.	Are these documents, data or information from an independent and reliable source?
4.	Can the Authority verify the identity of the customer?

¹ “**business relationship**” means a business, professional or commercial relationship which the Authority expects, at the time the contact is established, to have an element of duration.

² “**occasional transaction**” means a transaction, carried out other than as part of a business relationship, amounting to 15,000 Euro or more (£12,800), whether a single operation or several operations which appear to be linked.

³ Where the customer is a body corporate obtain and verify—
(i) the name of the body corporate; (ii) its company number or other registration number; and (iii) the address of its registered office, and if different, its principal place of business.

	[Through the documents referred to in Questions 2 and 3]	
5.	Is there a beneficial owner involved with the customer who is a different person or entity to the customer identified above?	
6.	What is the identity of the beneficial owner?	
7.	Can the Authority verify the identity of the beneficial owner?	
8.	Does the Authority doubt the veracity or adequacy of documents, data or information obtained for the purposes of identification or verification?	
9.	When were the documents, data or information obtained for the purposes of identification or verification of this customer last up-dated?	
10.	When will the documents, data or information obtained for the purposes of identification or verification of this customer next be up-dated?	
11.	What is the ownership and control structure of the beneficial owner?	
12.	Does the Authority wish to establish a business relationship with this customer?	<i>If "No", go straight to Section C.</i>
13.	What is the purpose and intended nature of the business relationship?	
SECTION C: OUTCOME OF DUE DILIGENCE MEASURES		
<p>Is the Authority unable to answer any of the above questions because the customer has been unable or unwilling to provide information?</p> <p>If so, please give full details.</p>		<p><i>If the answer is "Yes", the Authority must not establish a business relationship or carry out an occasional transaction with this customer; it must not carry out any transaction with or for the customer through a bank account; it must terminate any business relationship with the customer AND the suspicion must be reported immediately to the MLRO.</i></p>
<p>Please note: this pro-forma must be kept for five years from the end of the business relationship or occasional transaction with this customer</p>		

Report to Money Laundering Reporting Officer

Re money laundering activity

To: **David Sutherland, Money Laundering Reporting Officer**

From:
(insert name of employee)

Directorate: Ext/Tel No.
(insert post title and Cost Centre)

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 e.g. 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 know)?

Yes / No

If yes, please include details below:

Have you discussed your suspicions with anyone else?

(Please delete as appropriate)

Yes/ No

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) *(Please delete as appropriate)* **Yes / No**

If yes, please specify below:

Do you feel you have a reasonable excuse for not disclosing the matter to The National Crime Agency (e.g. are you a lawyer and wish to claim legal professional privilege?) *(Please delete as appropriate)* **Yes / No**

If yes, please set out full details below:

Are you involved in a transaction which might be a prohibited act under sections 327-329 of the Proceeds of Crime Act 2002 and which requires appropriate consent from The National Crime Agency? *(Please delete as appropriate)*

Yes / No

If yes, please set out full details 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 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 five 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?:

If there are reasonable grounds for suspicion, will a report be made to The National Crime Agency?

(Please delete as appropriate?)

Yes / No

If yes, please confirm date of report to The National Crime Agency and complete the box below:

Date reported:

<u>Details of liaison with The National Crime Agency regarding the report:</u>	
Notice Period:to
Moratorium Period:to

Is consent required from The National Crime Agency to any ongoing or imminent transactions which would otherwise be prohibited acts? Yes / No

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

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Date consent received from The National Crime Agency:.....

Date consent given by you to employee:.....

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to The National Crime Agency, please set out below the reasons(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:

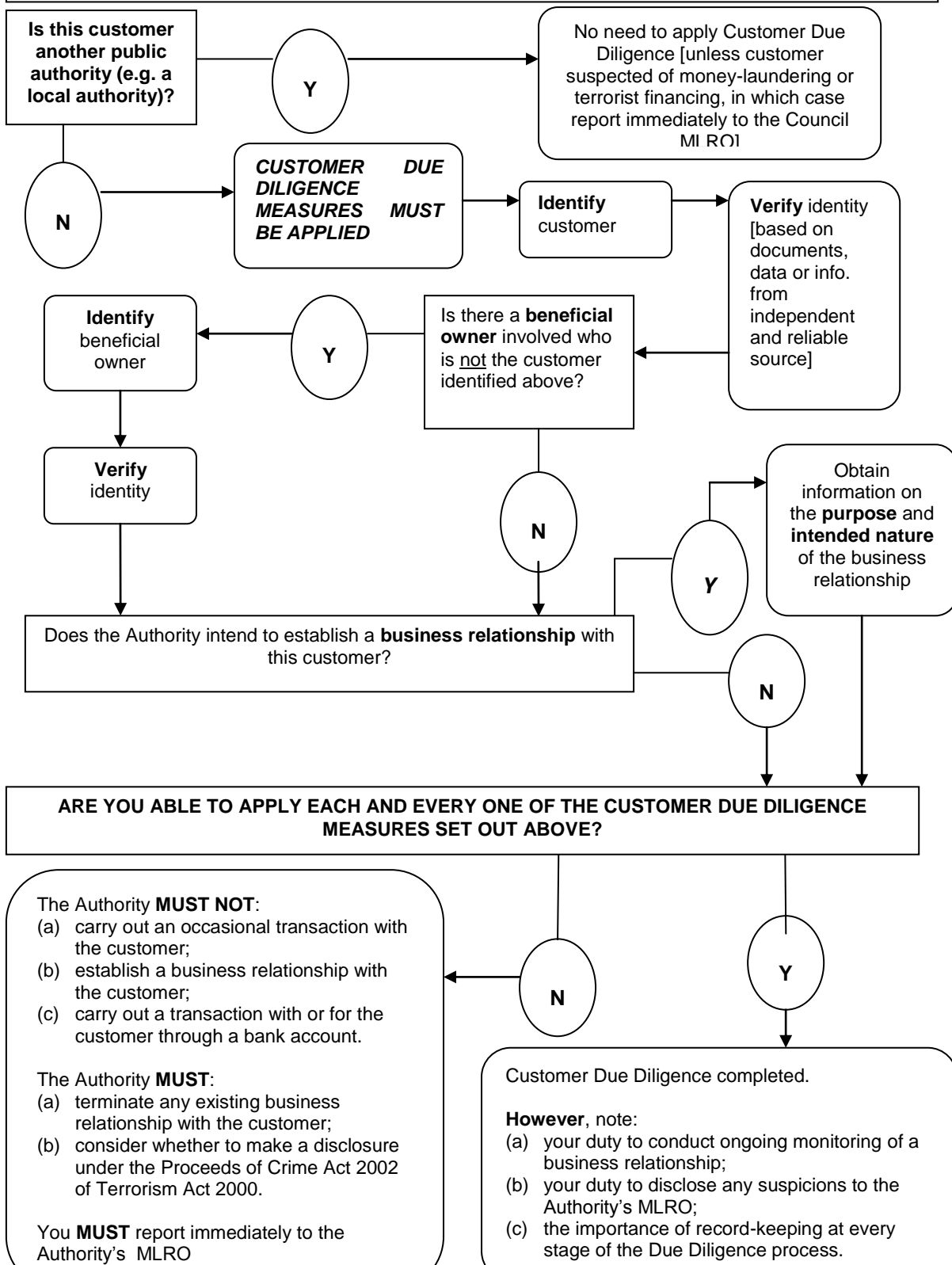
Signed:.....

Date:

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS

Money Laundering Regulations 2017: Customer Due Diligence

The Authority must generally undertake these Customer Due Diligence measures **before** it establishes a business relationship or carries out an occasional transaction. The measures should also be applied where the Authority doubts the veracity or adequacy of documents, data or information previously obtained for the purposes of identification or verification.

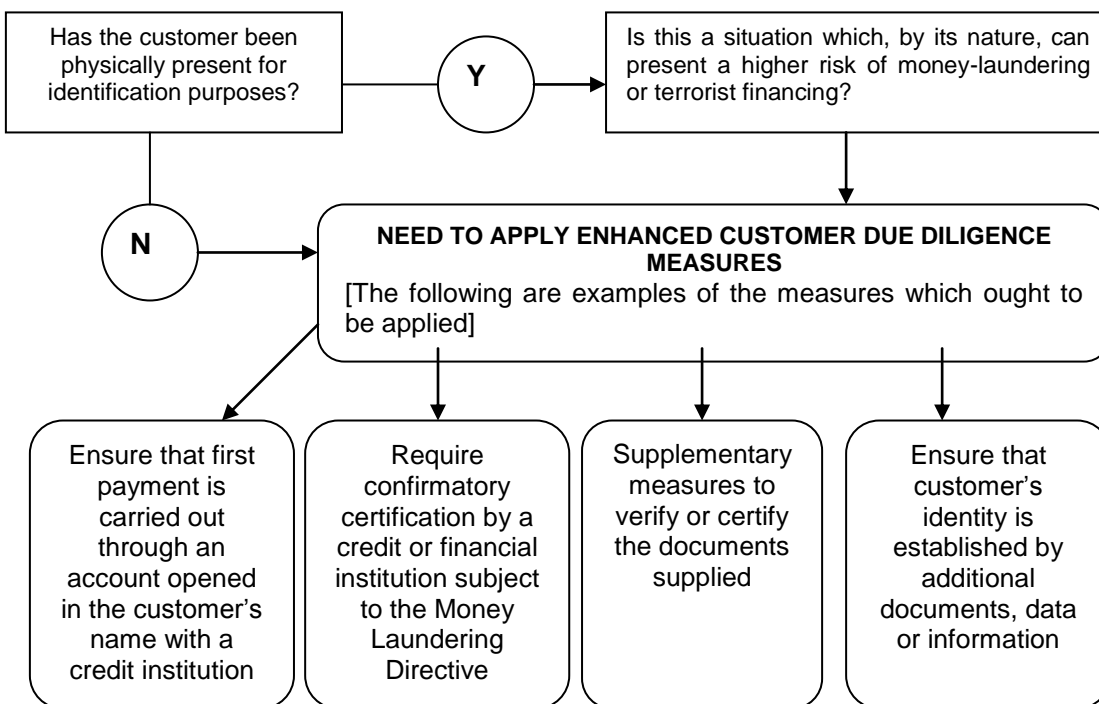


“business relationship” - a business, professional or commercial relationship which the Council expects, at the time the contact is established, to have an element of duration

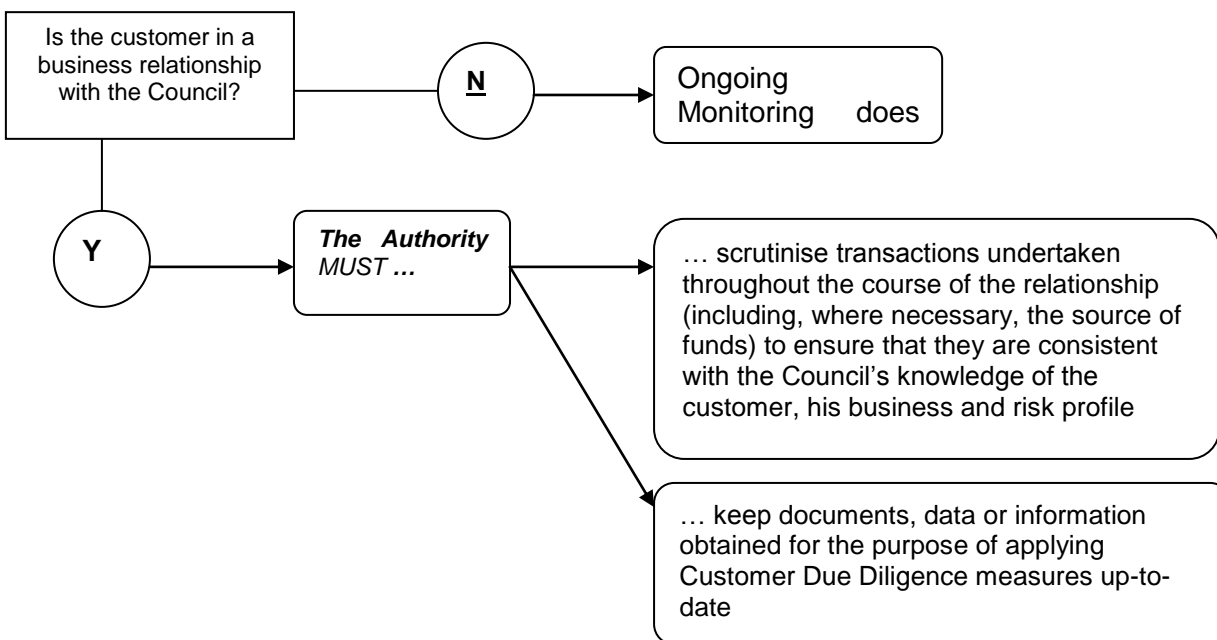
“occasional transaction” - a transaction, carried out other than as part of a business relationship, amounting to 15,000 Euro or more, whether a single operation or several operations which appear to be linked

Money Laundering Regulations 2017: Enhanced Customer Due Diligence and Ongoing Monitoring Flowchart
 [To be read in conjunction with the Authority's *Anti Money-Laundering Policy*]

ENHANCED CUSTOMER DUE DILIGENCE



ONGOING MONITORING



“business relationship” - a business, professional or commercial relationship which the Authority expects, at the time the contact is established, to have an element of duration