



Mid-Wales Housing Association - Policy

Title: **MONEY LAUNDERING**

Policy Statement:

- 1) Money laundering is the process by which money or other assets obtained through crime is exchanged for clean money or assets without an obvious link to the money's criminal origins. The UK anti-laundering regime has evolved over a number of years and the latest elements were introduced on 1st January 2010. To help protect housing associations from the effects of money laundering the National Housing Federation ('Federation') published guidance on anti-money laundering in May 2010 in conjunction with Tait Walker.
- 2) The Money Laundering regulations relate to 'regulated' activities. These are wide-ranging; however, for housing associations this would relate to any activity undertaken in granting a mortgage/loan, or any estate agency activity.
- 3) In strict legal terms unless the Association lends money or acts as agent in selling properties we are not caught by the Money Laundering regulations. However, the guidance from the Federation is that Associations should follow the Money Laundering regulations and guidance if they are involved in any aspect of selling a property.
- 4) This policy is therefore applicable to all property-selling activity.
- 5) The Association will :
 - a) Follow the Federation guidance on Anti-Money Laundering.
 - b) Register with the Office of Fair Trading (OFT).
 - c) Appoint a Money Laundering Reporting Officer and Deputy.
 - d) Establish checks, controls and procedures to anticipate and prevent money laundering.
 - e) Train all staff undertaking property sales in the procedures and the law on money laundering.
 - f) Put in place procedures to verify the identity of customers.
 - g) Keep records on the customer's identity and the selling transaction for six years.

Key Performance Areas:

- A. The Director of Corporate Services, in conjunction with the Operational Management team, establishes the appropriate procedures and training requirements relating to Anti-Money Laundering for all those involved with property sales.
- B. The Director of Corporate Services, in conjunction with the Operational Management Team and Executive Group, assesses the risks relating to Anti-Money Laundering and includes, as necessary, details on the Risk Map.

Purpose:	To ensure the risks of the Association being used for money laundering are minimised.	
Reference No:		
Date of Issue:	January 2011.	
Review Date:	Review every three years or when related legislation is enacted. January 2014.	
Departments / Sections Affected:	Development, Finance.	
Approved By:	Board of Management 26th January 2011	
Lead Officer:	Director of Corporate Services	
Statutory Compliance	Proceeds of Crime Act 2002 (Part 7) Money Laundering regulations 2007	
Strategic Risk Factors		
Equality Impact Assessment	<i>How does/will this policy ensure needs are met fairly, particularly with regard to race, gender, disability etc?</i>	N/A
	<i>Is it felt that this policy might affect different groups adversely. If so, what is the justification for this, and is it legally permissible?</i>	No groups or individuals are expected to be adversely affected
	<i>Have any representative groups in the locality been asked for their opinion and if so, what was the outcome?</i>	No
Tenant Engagement	<i>How does/will this policy ensure the needs of tenants are met?</i>	The object of this policy is to ensure risks relating to money laundering are minimised to ensure property sales are

		made to genuine purchasers.
	<i>How is it felt this policy will impact on the rights and obligations of tenants?</i>	It is not envisaged that this policy affects tenants' rights and obligations.
	<i>Have tenants been consulted and were the outcomes of that consultation taken into account when considering the introduction of this policy?</i>	At this time, tenants have not been consulted on this policy.