Anti-Money Laundering (AML) Policy

Introduction to the Policy
The Leicestershire Golf Club is required under the Money Laundering Regulations 2017 to put in place appropriate systems and controls to forestall money laundering. This policy contains the procedures that we have developed in order to comply with these obligations.

The Money Laundering Regulations require that an organisation has a Nominated Officer to ensure that there is up-to-date knowledge of issues relating to Anti-Money Laundering throughout the organisation, implement appropriate policies and procedures and receive reports of suspicious activity. The Nominated Officer is Will Bevan (General Manager) for The Leicestershire Golf Club.

What is money laundering and terrorist financing?
Money laundering is the process through which proceeds of crime and their true origin and ownership are changed so that the proceeds appear legitimate. Terrorist financing is providing or collecting funds, from legitimate or illegitimate sources, to be used to carry out an act of terrorism.

How does money get laundered?
Typically money laundering involves three stages

Placement:
The process of placing criminal property into the financial system. This might be done by breaking up large sums of cash into smaller amounts or by using a series of financial instruments (such as cheques or money orders) which are deposited at different locations.

Layering:
The process of moving money that has been placed in the financial system in order to obscure its criminal origin. This is usually achieved through multiple complex transactions often involving complicated offshore company structures and trusts.

Integration:
Once the origin of the money is disguised it ultimately must reappear in the financial system as legitimate funds. This process involves investing the money in legitimate businesses and other investments such as property purchases or setting up trusts.

We are most likely to become involved in the layering stage but potentially could be involved in any stage.

How do I know if my matter involves money laundering or terrorist financing?

You do not have to behave like a police officer but you do have to remain alert to the warning signs of money laundering and terrorist financing and make the sort of enquiries that a reasonable person (with the same qualifications, knowledge and experience as you) would make.

Typical signs of money laundering are:

- Obstructive or secretive clients
- Instructions outside our usual range of expertise, i.e. why is the client using us?
- Clients based a long way from us with no apparent reason for using us
- Cases or instructions that change unexpectedly or for no logical reason, especially where:
    - The client has deposited funds with us
    - The source of funds changes at the last moment
    - You are asked to return funds or send funds to a third party
- Loss-making transactions where the loss is avoidable
- Complex or unusually large transactions
- Transactions with no apparent logical, economic or legal purpose
- Large amounts of cash being used
- Money transfers where there is a variation between the account holder and signatory
- Payments to or from third parties where there is no logical connection to the client
- Movement of funds between accounts, institutions or jurisdictions without reason
- Retainers involving high risk jurisdictions (e.g. Iran, Uzbekistan, Turkmenistan, Pakistan, Sao Tome and Northern Cyprus)
- Large payment on account of fees with instructions terminated shortly after and the client requesting the funds are returned

Criminals are always developing new techniques so this list can never be exhaustive.

Scope:
The Leicestershire Golf Club will not accept any payment made in cash by any member of the golf club for values exceeding £300.00. This value was reduced from £500.00 on reviewing this policy in June 2019.

Any member of staff who is challenged on this by any member is to report the matter directly to the General Manager.