

Example Policy for Nominated Officer

1. The business requires you as its Nominated Officer to comply with this policy in addition to complying with the business's Anti Money Laundering Policy and Procedure.
2. Failure to carry out your duties may cause you to commit a criminal offence.
3. You will have access to all files, records and information and be given sufficient resources and authority to fulfil the role and be allowed to carry out your duties autonomously without fetter, influence or interference.
4. Upon receipt of each internal suspicion report from any members of staff, you must acknowledge receipt in writing to the person making the report. You must then consider carefully whether a report should be made to the National Crime Agency (NCA).
5. You must make a report to NCA in the prescribed form (which is available for online submission subject to you registering with the NCA) where you have actual knowledge or suspicion, or where (based on what an ordinary member of the public might think) there are reasonable grounds to know or suspect a money laundering offence has been committed.
6. You will need Consent from NCA for an ongoing transaction to proceed.
7. If you do make a report to NCA then you must ensure that you maintain regular telephone contact with them where Consent is required.
8. You must maintain a record of each decision you have made and keep it for at least 5 years whether or not you send a report to NCA.
9. You must support and advise members of staff who make internal suspicion reports to you, emphasising the implications for them of "tipping off". In particular you must do this where you are waiting for Consent to proceed from NCA.