Plus Dane Housing

Anti-Money Laundering Policy

GOV-POL-07-04

May 2026

Summary

Purpose:

The purpose of this document is to assist the management and colleagues of Plus Dane Housing Limited (Plus Dane) to understand:

- Plus Dane's anti-money laundering approach;
- Plus Dane's anti-money laundering procedures;
- How to report possible money laundering.

Audience:

All Plus Dane Colleagues

Anti-Money Laundering Policy

Plus Dane Housing

DOCUMENT CONTROL			
1. DOCUMENT INFORMATION			
Role	**Name/Position**		**Date**
Author	Ciara Gregson		April 2026
Approved by	Board		May 2026
Document Reference	GOV-POL-07		
2. DOCUMENT STATUS HISTORY			
Version	**Date**	**Change owner**	**Reason for Update**
1	OCT 8	Business Effectiveness Manager	Amended to reflect simplification of Plus Dane structure
2	JAN 20	Business Effectiveness Manager	Amended to reflect changes within Plus Dane
3	JAN 23	Governance & Assurance Manager	Scheduled review of policy and moved to new document template.
4	MAR 26	Governance Manager	Scheduled review, updated with Audit Actions and moved to new document template.
3. DOCUMENT REVIEW DATE			
Review Due	MAR 2029		
Responsible Officer	Governance Manager		
4. CONSULTATION			
Head of Treasury, EMT, Leadership Team			
5. DISTRIBUTION			
Via intro			

Anti-Money Laundering Policy

Plus Dane Housing

1. Policy Statement 4
2. Policy aims 4
3. Links to Corporate Plan 5
4. Key policy definitions 5
5. Roles and responsibilities 6
6. Our approach 9
6.1 How money launderers may target Plus Dane 9
6.2 How we reduce and control the risk of money laundering 9
6.3 Risk assessment and risk rating 10
6.4 Organisation-wide risk assessment (OWRA) 10
6.5 Risk rating for customers and transactions 10
6.6 Customer Due Diligence (CDD) requirements 11
6.7 Enhanced Due Diligence (EDD) 12
7. Expectations of Plus Dane Colleagues 13
8. How to report money laundering 15
8.1 Sanctions and Redress 15
9. Assurance 15
10. Equality Impact Assessment 16
11. Modern slavery & human trafficking 17
12. Data Protection Impact Assessment 17
13. Legislative and regulatory considerations 17
13.1 Primary Legislation 17
13.2 Regulatory and Functional Standards 18
13.3 Compliance Defence 18
14. Links to other Plus Dane policies 19
Appendix 1 - Legislation and regulations 20
Appendix 2 - Documents which can be used to verify identity 23

1. Policy Statement

The purpose of this document is to ensure all Board and Committee Members and colleagues of Plus Dane understand their responsibilities in preventing, detecting and reporting money laundering and associated criminal activity. This policy outlines:

- Plus Dane's anti-money laundering approach.
- Plus Dane's anti-money laundering procedures.
- How to report actual or suspected money laundering.

Money laundering is defined as the process by which criminally obtained money or assets are exchanged into something else to 'clean' them in a way that stops the money or asset being obviously connected with the crime from which they were generated. The 'clean' money is then fed back into the financial system, so its original source is hidden.

All Plus Dane colleagues, Board and Committee members must be aware of the actions being taken to prevent criminal activity through money laundering or similar impropriety and ensure all suspected cases are reported.

The Policy sets out the requirements that must be followed to ensure Plus Dane complies with its legal requirements in respect of anti-money laundering. These obligations are set out in relevant legislation, including the Money Laundering Regulations, The Proceeds of Crime Act and the Terrorism Act, and remain consistent with the guidance issued by the National Housing Federation which emphasises the importance of anti-money laundering controls within the housing sector.

Plus Dane has a zero tolerance to money laundering and other criminal activities. Everyone within Plus Dane has a role in ensuring that they and the organisation as a whole act with integrity. Colleagues and Board Members must ensure that any incidents are responded to professionally and quickly. Failure to comply with this Policy may lead to disciplinary and/or criminal action being taken.

Plus Dane and all colleagues have a significant role to play in tackling the problems caused by crime. Effective use of systems as detailed in this policy will support colleagues in recognising how money laundering occurs and how it may affect the organisation. This will also benefit our communities by helping to disrupt criminal activity and may contribute to the reduction of anti-social behaviour.

Failure to adhere to this policy will result in an investigation into what activities have taken place. This could lead to disciplinary, civil and criminal proceedings.

2. Policy aims

The aims of this policy are to minimise:

- The threat of money laundering by setting out Plus Dane's approach to detecting and preventing money laundering and detailing responsibilities of key stakeholders across the organisation.

- The risk of Plus Dane breaching the relevant legislation and regulations by outlining the key elements of these and Plus Dane's approach to compliance.

It is our policy that all UK legal and regulatory anti-money laundering obligations will be met in full, these include those set out in the legislation and regulations.

3. Links to Corporate Plan

This policy directly contributes to each of the four strategic pillars of the Corporate Plan:

3.1. Customer Experience - The prevention of money laundering and associated criminal behaviour this policy supports the delivery of excellent, fair and transparent services to customers. A strong anti-money laundering framework will maintain trust, protect customers from exploitation, and ensure our services operate with integrity.

3.2. Sustainable Organisation - This policy ensures Plus Dane fully complies with UK anti-money laundering legislation and maintains effective internal controls. Preventing financial crime protects organisational assets, reduces risk exposure and supports value for money and long-term sustainability.

3.3. Vibrant Communities - Effective anti-money laundering arrangements disrupt criminal activity such as fraud, drug cultivation, illegal subletting and exploitation and other issues which can impact neighbourhood and community safety and wellbeing. This policy supports the identification and prevention of these risks, therefore contributing to safer, more resilient and more vibrant communities.

3.4. Colleague Experience - This policy supports colleagues by providing clear guidance on how to recognise and report suspicious activity, reinforcing a culture of accountability and professionalism, providing the skills and knowledge necessary to understand their responsibilities and act with integrity.

4. Key policy definitions

Money Laundering

Money laundering is the process by which funds derived from criminal activity are given the appearance of being legitimate. That means that the proceeds of a crime are 'cleaned up' by various means and then fed back into the financial system after a transaction or series of transactions designed to disguise the original source of the funds. It also covers money, however come by, which is used to fund terrorism.[1]

Money laundering can take a number of forms that include but are not restricted to:

- Handling the proceeds of crime.
- Being directly involved with criminal or terrorist property.
- Entering into arrangements to facilitate laundering of criminal or terrorist property.

[1] NHF Guidance on anti-money laundering

- Investing the proceeds of crime into other financial products, property purchase or other assets.

Criminal Property

Criminal property refers to money, assets or any form of property that represents a benefit from criminal conduct, either directly or indirectly.

Terrorist Financing

Terrorist financing includes the possession, use or movement of funds intended to support terrorism or terrorist groups, regardless of whether the funds originate from lawful or unlawful means.

Customer Due Diligence

Customer Due Diligence is the process of verifying the identity of a customer and, where relevant, establishing the source of funds before entering into a business relationship or carrying out certain transactions.

Suspicious Activity

Suspicious activity is any transaction or behaviour which appears irregular, unusual or inconsistent with what is known about a customer, and which may give rise to a suspicion of money laundering or terrorist financing.

Money Laundering Reporting Officer (MLRO)

The MLRO is the designated officer responsible for receiving and assessing internal reports of suspected money laundering and deciding whether these should be reported to the National Crime Agency (NCA). At Plus Dane the MLRO is the Head of Treasury.

Deputy MLRO

The Deputy MLRO supports the MLRO and acts in their absence, ensuring continuity of the anti-money laundering responsibilities. At Plus Dane the Deputy MLRO is the Senior Treasury Officer.

Legislation and Regulations

Anti-money laundering requirements arise from the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002 and the Terrorism Act 2000. These set out the legal duties placed on organisations such as Plus Dane. Further detail on legislation is included in Appendix 1.

5. Roles and responsibilities

Plus Dane Board

The Board has overall responsibility for ensuring that Plus Dane has effective arrangements in place to prevent and detect money laundering. This includes ensuring compliance with all relevant legislation and maintaining a strong organisational culture of integrity. This includes:

- Approving the Anti-Money Laundering Policy and ensuring it is reviewed at least every three years.
- Ensuring adequate oversight of money laundering risks through regular assurance reporting, including updates provided to the Audit & Assurance Committee.
- Setting expectations that money laundering and associated criminal activity will not be tolerated within the organisation.
- Promoting a culture where colleagues are encouraged to recognise and report suspicious activity.

Audit & Assurance Committee

The Audit & Assurance Committee is responsible for:

- Receiving quarterly reports relating to money laundering cases or concerns.
- Providing scrutiny and assurance over the adequacy of anti-money laundering controls.
- Ensuring the Board is sighted on emerging risks or compliance issues.

Executive Management Team (EMT)

EMT is responsible for ensuring that the organisation implements the Anti-Money Laundering Policy effectively and that operational controls are in place across all service areas. This includes:

- Ensuring systems, processes and resources are in place to meet legal and regulatory AML obligations.
- Supporting the MLRO in maintaining organisational compliance and ensuring issues raised are addressed promptly.
- Ensuring that colleagues understand their responsibilities and have access to appropriate guidance and training.
- Ensuring that all incidents of suspected money laundering are responded to professionally and quickly.

Money Laundering Reporting Officer (MLRO)

The MLRO is the designated officer responsible for overseeing Plus Dane's compliance with anti-money laundering legislation. This includes:

- Receiving and evaluating internal reports of suspected money laundering.
- Determining whether a Suspicious Activity Report should be submitted to the NCA.
- Maintaining secure records of all reports received and decisions made.
- Providing advice and guidance to colleagues on money laundering concerns.
- Ensuring organisational compliance with relevant anti-money laundering legislation and internal procedures.
- Supporting training, awareness, and communication of anti-money laundering responsibilities across the organisation.
- Reviewing rent refunds over £1,000 as part of routine monitoring, and escalating concerns where appropriate.

- Liaising with the Executive Management Team, Governance & Assurance Team, and Audit & Assurance Committee regarding AML activity.

Deputy MLRO

The Deputy MLRO acts as the secondary point of contact for all anti-money laundering matters and supports the MLRO in carrying out their statutory and regulatory duties. This includes:

- Acting on behalf of the MLRO during periods of absence or unavailability.
- Supporting the assessment of internal reports of suspected money laundering.
- Assisting in the preparation and maintenance of AML records and documentation.
- Contributing to training, communication and awareness activity across the organisation.
- Supporting weekly reviews of rent refunds over £1,000 and escalating concerns to the MLRO.
- Providing guidance to colleagues regarding identification checks, reporting routes, and signs of suspicious activity.

All Colleagues

Every colleague has a responsibility to remain vigilant and to act in accordance with the Anti-Money Laundering Policy. This includes

- Being aware of the signs of money laundering and reporting any suspicions to the MLRO or Deputy MLRO.
- Following all identity verification and due diligence procedures applicable to their role.
- Not alerting or “tipping off” any person suspected of money laundering.
- Ensuring all suspicious incidents are managed professionally and quickly.

Managers and Supervisors

All managers and supervisors are responsible for:

- Ensuring colleagues understand and comply with anti-money laundering requirements.
- Supporting colleagues in identifying and reporting suspicious activity
- Monitoring activity within their service areas for potential anti-money laundering activities.
- Escalating any compliance failures to the MLRO.

The Procurement Team

The Procurement team plays a key role in preventing and criminal misuse of supplier arrangements. The team are responsible for:

- Completing due diligence checks to verify supplier identity and legitimacy.
- Ensuring procurement transactions follow approved processes and are not being used to conceal criminal activity.
- Escalating suspicions to the MLRO.

- Maintaining accurate records of due diligence checks.

The Lettings Team

Lettings colleagues are often the first to encounter risks linked to tenancy fraud, criminal property use or suspicious financial behaviour. The team is responsible for:

- Completing identity verification, including Right to Rent Checks.
- Identifying and responding to suspicious behaviour or unusual payment patterns.
- Reporting concerns to the MLRO.
- Remaining vigilant to signs of illegal property use such as drug cultivation or human trafficking.

Governance & Assurance Team

The Governance and Assurance team is responsible for:

- Ensuring this policy is maintained, reviewed and kept up to date.
- Preparing quarterly internal control reports to Audit and Assurance Committee, including anti-money laundering related concerns.
- Undertaking periodic oversight of anti-money laundering control frameworks within Procurement and Lettings.

6. Our approach

Plus Dane is committed to a proactive, risk-based approach to preventing and detecting money laundering. This approach ensures compliance with legal and regulatory obligations, protects the organisation from criminal activity and safeguards our customers, colleagues and communities.

6.1 How money launderers may target Plus Dane

Many criminals use property purchase as a means of laundering the proceeds of their crimes. Criminals will also use properties for illegal activities such as drug dealing, prostitution and cultivating cannabis.

By definition, money laundering involves the proceeds of crime. Allowing criminals to launder money allows them to profit from their crimes.

As a result, Plus Dane may be impacted through the delivery of services such as:

- Through sale of homes.
- Misuse of let or unoccupied homes through illegal activity such as sub-letting or criminal behaviour.
- Through letting our homes to unverified applicants or those who do not have the right to rent.

6.2 How we reduce and control the risk of money laundering

A key aspect of preventing money laundering is knowing who we are dealing with. Obtaining proof of identity is a minimum requirement before we transact on any level with any individual or organisation. It is essential that proof of identity is obtained:

- When Plus Dane becomes involved in a new business relationship.
- When an occasional transaction is carried out to a value of €15,000 (circa £12,000) or above.
- For all new customers upon first contact with them. If unable to meet in person with a new customer face-to-face, the Money Laundering Reporting Officer (MLRO) should be contacted for advice on how to proceed.

An individual's identity is ascertained by viewing:

- One original document providing proof of name.
- One original document providing proof of address.
- The Government's approved list of acceptable forms of identification can be found in Appendix 2.
- Report any suspicious activity to the MLRO.

6.3 Risk assessment and risk rating

Plus Dane applies a risk-based approach to anti-money laundering. This means that the type and extent of checks we undertake must be proportionate to the level of money laundering or terrorist financing risk presented by the customer, the transaction and the way we interact with them.

6.4 Organisation-wide risk assessment (OWRA)

The MLRO is responsible for maintaining an organisation-wide money laundering and terrorist financing risk assessment covering Plus Dane's products and services, delivery channels, customer types and geographic exposure.

The OWRA will be reviewed at least annually, and additionally when there is a material change in Plus Dane's activities or risk profile (for example: introduction of a new product/service, new delivery channel, significant fraud trend, or regulatory change).

Key outcomes from the OWRA (including material changes to risk appetite, controls or residual risk) will be reported through established governance routes (including Audit & Assurance Committee reporting) to support oversight and assurance.

6.5 Risk rating for customers and transactions

Colleagues must consider the risk level of a customer/transaction and apply proportionate checks. Risk factors may include (but are not limited to):

- **Customer risk:** reluctance to provide information, unusual behaviour, use of intermediaries/third parties, complex ownership/control structures, or inconsistencies between known circumstances and the transaction.
- **Product/service risk:** property sales/resales (including shared ownership resales), large refunds, non-standard payment arrangements, or transactions that are unusual for the customer/service area.
- **Delivery channel risk:** inability to meet face-to-face, remote/on-line engagement, or where identity evidence cannot be verified through usual methods.

- **Geographic risk:** links to high-risk jurisdictions (for example where funds originate overseas or where a customer/entity is based outside the UK).
- **Transaction risk:** large values, unusual urgency, attempts to avoid normal processes, use of cash, multiple small payments, or payments from/to third parties with no clear rationale.

Where a higher risk is identified, colleagues must apply enhanced checks and seek advice from the MLRO (or Deputy MLRO) before proceeding. Risk assessments and decisions must be documented and retained in accordance with Plus Dane's record-keeping requirements.

6.6 Customer Due Diligence (CDD) requirements

CDD is the process of identifying and verifying who we are dealing with and understanding the purpose and nature of the relationship/transaction. CDD helps Plus Dane prevent its services being used to launder the proceeds of crime or to finance terrorism.

When CDD must be completed

- Before entering into a new business relationship or progressing a transaction where CDD is required for the activity being undertaken.
- Before carrying out an occasional transaction with a value of €15,000 (circa £12,000) or above (including a series of linked transactions).
- At any time there are doubts about the adequacy, accuracy or validity of previously obtained identification information.
- When a customer's circumstances or behaviour changes in a way that increases money laundering risk (for example: change in payer, unusual payment pattern, third-party involvement, or material change in funding).

Standard CDD (individuals)

- **Identify** the customer and obtain evidence of their name and address (see Appendix 2).
- **Verify** that the evidence is genuine and belongs to the customer (for example: check photograph likeness, consistency of addresses, expiry dates and signs of alteration).
- **Understand the purpose** of the relationship/transaction and whether it is consistent with what we know about the customer and the service being provided.
- **Record and retain** copies/records of checks completed and decisions made.

CDD for non-individuals (companies and other entities)

- Obtain and verify the entity's identity (for example: legal name, registration number, registered address and trading address).
- Identify and verify the individuals who are authorised to act on behalf of the entity.
- Identify and take reasonable measures to verify the entity's ownership and control structure, including (where applicable) beneficial owners and persons with significant control.

- Understand the purpose and intended nature of the relationship/transaction and whether it is consistent with the entity's activities.
- Where ownership/control is complex, unclear, overseas or otherwise higher risk, colleagues must seek advice from the MLRO (or Deputy MLRO) before proceeding.

Source of funds and payment controls

- Colleagues must consider where funds are coming from and whether the source of funds is reasonable and consistent with what is known about the customer and the transaction.
- Evidence of source of funds must be obtained where proportionate to the risk and nature of the transaction (for example: bank/building society statements showing accumulation of funds, completion statements, evidence of savings, inheritance, property sale, salary, or regulated lending).
- Where payment is offered by a third party with no clear link to the transaction, or where payment arrangements appear unusual, colleagues must not proceed without guidance from the MLRO (or Deputy MLRO).
- Any request to pay a large sum in cash, to split payments to avoid checks, or to route funds through multiple accounts must be treated as a risk indicator and escalated.

Ongoing monitoring and refresh

- CDD does not end once identification has been obtained. Colleagues must remain alert to unusual activity, changes in behaviour or payment patterns and any inconsistency between information held and what is observed.
- CDD information must be refreshed where risk changes or where there are doubts about previous checks.
- Concerns must be escalated promptly to the MLRO (or Deputy MLRO) in line with section 8.

6.7 Enhanced Due Diligence (EDD)

EDD means applying additional checks and obtaining additional information where the risk of money laundering or terrorist financing is higher. EDD must be proportionate to the level of risk and must be completed before proceeding with the transaction or continuing the relationship.

When EDD is required

- Where the customer/transaction has one or more higher-risk features identified through the risk assessment and risk rating process.
- Where the customer is not met face-to-face and adequate verification cannot be achieved through standard methods.
- Where the customer, payer, beneficial owner or controlling person is linked to a higher-risk jurisdiction (for example where funds originate overseas or where an entity is based outside the UK).
- Where there is a complex or opaque ownership and control structure, including where beneficial ownership cannot be clearly established.

- Where funds are provided by, routed through, or refunded to a third party with no clear and legitimate rationale.
- Where there is any suspicion of money laundering or terrorist financing, or where a transaction appears unusual, unnecessarily complex or inconsistent with what is known about the customer.

What EDD involves

- **Obtain additional identity evidence** and/or further verification steps (for example: additional documents, independent verification, or further checks of document authenticity).
- **Obtain additional information** on the purpose of the relationship/transaction and why the proposed structure or payment route is being used.
- **Obtain and assess source of funds** evidence in more detail, and where appropriate consider the broader context (for example how funds were accumulated). Where the risk is high, the MLRO may require evidence to support **source of wealth**.
- **Understand ownership and control** in more detail for entities (including clarifying beneficial ownership, control mechanisms and, where applicable, parties acting on behalf of others).
- **Enhanced monitoring** during the relationship/transaction, including closer review of payment patterns, changes in payer, or attempts to vary the transaction.

Approvals and escalation

- Colleagues must seek guidance from the MLRO (or Deputy MLRO) where EDD is required or where they are unsure what level of checks is proportionate.
- Where concerns remain unresolved, or where there is suspicion of money laundering/terrorist financing, the matter must be escalated in line with section 8 and the transaction must not proceed unless and until the MLRO confirms it is appropriate to do so.
- All EDD checks, evidence obtained and decisions made must be documented and retained in line with Plus Dane's record-keeping requirements.

7. Expectations of Plus Dane Colleagues

All colleagues are expected to be aware of and follow the organisation's anti-money laundering policies and procedures. These policies and procedures are designed and written to comply with current Anti-Money Laundering (AML) legislation and aim to protect the organisation and its colleagues against any attack by money launderers.

Colleagues should always be alert for anything suspicious. Key areas of risk where money laundering may occur across the business are:

- Property sales, including Right to Buy and Right to Acquire
- Development activities
- Arrears recovery

- Procurement activity

Colleagues must always ascertain where any funds being used have come from. Plus Dane must only accept original, hard-copy bank statements for the source account which clearly shows the accumulation of the funds. If a satisfactory explanation cannot be provided or there is still suspicion, the concerns must be reported to the MLRO.

Key money laundering risk factors specific to the Plus Dane's business are:

- Illegal substances can often be farmed in residential properties and used as a means to launder money. This can present a danger to other residents due to an increased fire risk.
- Human trafficking and exploitation of women and children is a fast-growing area of criminality and properties can be used as accommodation for the victims of trafficking.
- Tenancy fraud and sub-letting.
- Drug trafficking and illicit laboratories with the related problems of anti-social behaviour and danger to residents.

Fraud, whether perpetrated by colleagues or from another source, creates the proceeds of crime which are then laundered. Housing Associations are susceptible to the same risks as any business. Some examples are:

- Collusion fraud by contractors or suppliers to corrupt the tendering process or colleagues involved in such collusion
- Gratuities or incentives to colleagues as an incentive to award contracts
- Criminals setting up front companies or shell companies to defraud associations.

The Regulations require that Plus Dane puts a number of risk sensitive policies and procedures in place to mitigate the risk of its services being targeted by criminals to launder the proceeds of crime.

Whilst there can never be a definitive list of suspicious activities, the following examples should raise suspicion of potential money laundering:

- Checking a new customer's identity is difficult (e.g. there is reluctance to provide details of their identity).
- The size of a transaction is not consistent with previous activity, or the financial circumstances of an existing customer have changed dramatically (e.g. a customer on Housing Benefit suddenly has the funds to buy a house).
- Money is paid by a third party who has no obvious link with the transaction.
- The customer wants to pay a large sum in cash.
- A customer makes an approach to purchase a property then pulls out when asked for identification.
- An individual, organisation or third party offers to fund a specific project or initiative for no apparent reason.

Further examples of suspicious transactions which could indicate money laundering will be described during anti-money laundering training sessions and in updates sent out by the MLRO.

The organisation requires that colleagues **'think risk'** and pay particular attention to customers and transactions which raise suspicion.

Whilst training will outline the overview of the requirements of colleagues in respect of money laundering, it should be noted that new money laundering schemes are being devised all the time, many of which are predicated on digital interventions. Colleagues must remain vigilant and report any suspicious no matter how minor it seems.

8. How to report money laundering

In all cases of suspicious activity, a reasonable explanation should be sought as well as clarification of where any money is coming from. If a satisfactory explanation cannot be provided or there is still suspicion, the concerns must be reported to the MLRO.

All questions in relation to money laundering issues should be addressed to the Head of Treasury by email to moneylaunderingqueries@plusdane.co.uk . Colleagues can access further information on Intro.

8.1 Sanctions and Redress

The sanctions and redress that can be applied against individuals should be read in conjunction with the organisation's Disciplinary Policy and Procedure.

The types of sanction which may apply are:

- Civil – sanctions can be taken to recover money and/or assets which have been fraudulently obtained, including interest and costs.
- Criminal – Plus Dane will work in partnership with the Police and the Crown Prosecution Service to bring a case to court against an offender. Outcomes, if found guilty, can include fines, a community order or imprisonment and of course, a criminal record.
- Disciplinary – procedures will be initiated when a colleague is suspected of being involved in fraudulent or illegal activity.

Plus Dane Housing will seek financial redress whenever possible to recover losses due to money laundering. Redress can take the form of confiscation under the Proceeds of Crime Act 2002, Money Laundering Regulations, compensation orders, a civil order for repayment, or a local agreement between Plus Dane and the offender. Funds recovered will be returned to Plus Dane for use as originally intended.

9. Assurance

Plus Dane will maintain a robust internal control framework to ensure ongoing compliance with the Anti-Money Laundering legislation, regulation and internal policy requirements. The following arrangements for the basis of the organisation's approach.

A quarterly Internal Controls Report will be presented to the Audit & Assurance Committee summarising:

- any money-laundering concerns raised (current year and prior year)
- fraud cases, whistleblowing concerns, declarations of interest compliance
- gifts and hospitality activity
- key first-line and second-line anti-money laundering controls and performance indicators
- trends, themes and emerging risks.

Where a suspicious activity is escalated to the MLRO, the MLRO will investigate, document findings, and determine whether a Suspicious Activity Report (SAR) must be submitted to the National Crime Agency (NCA).

The MLRO will ensure that transactions subject to reporting do not proceed without appropriate consent from the NCA, where required.

Continuous Improvement Policies, procedures, and internal controls will be reviewed at least every three years, or sooner where legislative or regulatory changes occur.

Learning from identified anti-money laundering concerns, emerging criminal methodologies, audit findings, and colleague feedback will be incorporated into the ongoing development of the AML framework.

These assurance arrangements ensure that Plus Dane maintains effective, risk-sensitive controls across the organisation, supports compliance with statutory requirements, and upholds its zero-tolerance approach to money laundering and related criminal activity

First line – Operational Management	**Second line – Governance and Assurance Oversight**	**Third line – Internal and External Audit**
Operational teams including Procurement, Lettings, Rent & Income, Development and Repairs, are responsible for carrying out due diligence, monitoring customer activity, completing required checks and escalating concerns to the MLRO or Deputy MLRO. Colleagues must remain alert to suspicious behaviour and follow anti-money laundering procedures at all times.	The Governance & Assurance Team provides oversight of AML controls, including assurance reviews within Procurement and Lettings. The MLRO and Deputy MLRO conduct enhanced monitoring (including weekly review of rent refunds over £1,000), maintain AML records, and advise colleagues on concerns	Internal Audit periodically reviews the effectiveness of AML controls and reports findings to management and the Audit & Assurance Committee. Plus Dane implements audit recommendations to strengthen the overall control environment

1. Equality Impact Assessment

The policy is intended to be applied consistently across all colleagues and tenants. No differential impact has been identified, and the approach supports fair and equitable treatment for all individuals, regardless of their protected characteristics.

10. Modern slavery & human trafficking

There are close links between those perpetrators of money laundering and modern slavery / human trafficking. When applying this policy colleagues should review the wider scenario and assess whether there is any evidence of slavery or human trafficking. If it appears that there is, or potentially is, colleagues should raise a cause for concern in line with Plus Dane's Safeguarding Procedure.

11. Data Protection Impact Assessment

A DPIA is not required as no new data-processing risks were identified.

12. Legislative and regulatory considerations

This policy has been developed to ensure Plus Dane Housing remains compliant with the following key pieces of legislation and regulatory standards:

13.1 Primary Legislation

- **Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("The Money Laundering Regulations").** Defines the legal obligations placed on organisations carrying out regulated activities, including:
    - conducting customer due diligence (CDD).
    - applying enhanced due diligence (EDD) in higher-risk situations.
    - monitoring business relationships on an ongoing basis.
    - maintaining records of identity, transactions and risk assessments.
    - appointing a Money Laundering Reporting Officer (MLRO).
    - reporting suspicious activity to the National Crime Agency (NCA).

  Plus Dane is supervised by HMRC for compliance with the Regulations.
- **The Proceeds of Crime Act 2002:** Sets out the primary criminal offences relating to money laundering, including:
    - Concealing, disguising, converting, transferring or removing criminal property
    - Entering into or facilitating arrangements concerning criminal property.
    - Acquiring, using or possessing criminal property.

  POCA also establishes asset recovery powers including confiscation, civil recovery and cash seizure, and creates offences for failure to disclose and tipping off.
- **The Terrorism Act 2000:** Creates offences related to the financing of terrorism, including**:**
    - fundraising for terrorist purposes.
    - using or possessing property for terrorism.
    - facilitating the retention or control of terrorist property.
    - money laundering connected to terrorist financing.
- **The Criminal Finances Act 2017:** Strengthens the UK's ability to tackle money laundering and recover criminal assets. Key provisions include:
    - Unexplained Wealth Orders (UWOs).
    - Information-sharing powers for regulated bodies.
    - Enhancements to suspicious activity reporting.

13.2 Regulatory and Functional Standards

- **HMRC Supervision Requirements (under the Money Laundering Regulations)** Plus Dane is supervised by the HMRC for anti-money laundering compliance for business activities including:
    - Where Plus Dane requires a Category 'A' Consumer Credit Licence (CCL) for aspects of its business, such as the granting of second charge shared equity mortgages (shared ownership schemes).
    - Where Plus Dane acts on behalf of another organisation in the sale of a property or in respect of the sale of a property on behalf of the occupier who is the co-owner. In these circumstances Plus Dane would be acting pursuant to instructions from another and this would fall within the definition of estate agency work.
    - Where Plus Dane instructs a third party, such as an estate agent, to sell property on its behalf those actions may also fall into the description of estate agency work where there is shared equity with the resident.

  This requires Plus Dane to maintain risk-sensitive systems and controls, carry out due diligence, and comply with suspicious activity reporting duties.

- **National Crime Agency – Suspicious Activity Reporting:** Organisations and MLROs are required to:
    - submit suspicious activity reports where knowledge or suspicion of money laundering exists.
    - seek "appropriate consent" before proceeding with certain transactions.
    - maintain secure records of reports made.

- **Regulator of Social Housing (RSH) – Governance and Financial Viability Standard:** Requires registered providers to have:
    - an effective system of internal controls.
    - risk management arrangements that identify and mitigate financial crime, including money laundering.
    - assurance reporting to governing bodies.

- **Government Functional Standard GovS 013: Counter Fraud:** Sets expectations for managing economic crime risks, including money laundering. Requires a structured approach to:
    - fraud risk assessment
    - internal controls
    - training and awareness
    - governance and oversight.

13.3 Compliance Defence

Plus Dane maintains this Anti-Money Laundering Policy, associated procedures, due-diligence processes and reporting arrangements to ensure compliance with:

- the Money Laundering Regulations.

- the Proceeds of Crime Act.
- the Terrorism Act.
- wider counter-fraud and financial-crime legislation.

These measures support Plus Dane in demonstrating that it has taken reasonable steps to and proportionate steps to prevent money laundering and to comply with statutory duties.

13. Links to other Plus Dane policies

- Financial Regulations
- Terms & Conditions of Employment
- Standing Orders
- Code of Conduct
- Data Protection Policy
- Anti-Fraud, Bribery and Corruption Policy
- Whistleblowing Policy
- Income Policy
- Right to Buy and Right to Acquire Policy

Appendix 1 - Legislation and regulations

Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("The Regulations").

The Regulations apply to a wide range of credit and financial services carried out by Plus Dane. It includes large cash transactions worth at least €15,000 (approx. £12,000 depending on the exchange rate) or more as a single transaction or set of associated transactions.

Whilst not all areas of the Regulations apply to Plus Dane, there are a number of activities carried out by the organisation that would mean the regulations do apply. A summary of this is as follows:

- Consumer credit activities and other regulated lending activities. Plus Dane has a consumer Credit Licence in place.
- Lending including recoverable grant funding - This is not currently relevant to Plus Dane.
- Money service businesses (i.e. businesses that provide services transmitting or converting money) - This is not currently relevant to Plus Dane.
- Granting second charge mortgages - This is not currently relevant to Plus Dane.
- Acting on behalf of the occupier who is the co-owner – this would be relevant to Plus Dane in the context of its shared ownership portfolio in a resale context. In these circumstances, we would be acting pursuant to instructions from another, and this would fall within the definition of estate agency work for the purposes of the Regulations, and the regulator would be HMRC.
- Instructing a third party, such as an estate agent, to sell property on our behalf - those may also fall into the description of estate agency work where there is shared equity with the resident.

Due to the in-scope activities described above, Plus Dane is required to maintain risk sensitive policies covering its activities. This includes:

- Putting in place checks, controls and procedures to anticipate and prevent money laundering or terrorist financing.
- Training for colleagues in those procedures and in the law relating to money laundering and terrorist financing.
- Appointment of a nominated Money Laundering Reporting Officer (MLRO) to receive/consider internal disclosures and make Suspicious Activity Reports to the National Crime Agency. The MLRO for Plus Dane is the Head of Treasury.

- Establishing colleague screening measures for appointed officers and those working within regulated activities.
- Putting in place procedures to identify customers and verify their identities before entering into a business relationship or transaction, to obtain information on the purpose or nature of the business relationship and to conduct ongoing monitoring of the business relationship as appropriate.
- Keeping records obtained in establishing customers' identity and of business relationships for five years.
- Organisation-wide risk assessments.
- Procedures for reporting suspicious activity.

The Proceeds of Crime Act 2002

The Proceeds of Crime Act 2002 applies to all individuals within the UK, and offences under this Act carry severe penalties including imprisonment for up to 14 years.

The primary offences relating to money laundering under this Act are:

- Concealing, disguising, converting, transferring or removing criminal property from the UK
- Entering into or becoming involved in an arrangement which facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person.
- The acquisition, use and/or possession of criminal property regardless of value. An offence is committed even if the proceeds of crime are used in a transaction between Plus Dane and a customer. Proceeds can result from offences which seem trivial, such as a customer benefits by not pointing out an administrative error made by someone else. The crime could be committed by Plus Dane's customer in relation to their tenancy (e.g. tenancy fraud), or the proceeds of crime being used to pay Plus Dane for its services or transactions.

There are also two third party offences:

- Failure to disclose knowledge or suspicion of money laundering to the nominated MLRO or, in the case of an MLRO, their failure to report to the National Crime Agency as appropriate
- Tipping off any person that a disclosure has been made.

The Terrorism Act 2000 (as amended August 2008)

The primary offences relating to terrorist funding are set out in this Act as follows:

- Fundraising for the purpose of terrorism
- Using or possessing money or other property for the purposes of terrorism

- Involvement in funding arrangements
- Money laundering – facilitating retention or control of property (including money) which is destined for, or is the proceeds of, terrorism
- Involvement in arrangements to conceal, remove from the jurisdiction, transfer to nominees or any other retention or control of terrorist property may also be considered as money laundering under this Act.
- Commercial considerations never override the need to comply with Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("The Regulations").
- Positive management action will be exercised in order to minimise the risk of our services being abused for the purposes of laundering funds including the allocation of sufficient resources to the development, documentation and training necessary to ensure compliance.
- Transactions with individuals or businesses whose conduct gives rise to suspicion of involvement with illegal activities will be reported to the National Crime Agency (NCA) and will not proceed without consent from NCA.

Appendix 2 - Documents which can be used to verify identity

The following documents are acceptable for identifying a customer in a face-to-face transaction.

Proof of name	**Proof of address**
Current signed passport	Utility bill (gas, electric, satellite television, landline phone bill) issued within the last three months
Original birth certificate (UK birth certificate issued within 12 months of the date of birth in full form including those issued by UK authorities overseas such as Embassies High Commissions and HM Forces)	Local authority council tax bill for the current council tax year
EEA member state identity card (which can also be used as evidence of address if it carries this)	Current UK driving licence (but only if not used for the name evidence)
Current UK or EEA photocard driving licence	Bank, Building Society or Credit Union statement or passbook dated within the last three months
Full old-style driving licence	Original mortgage statement from a recognised lender issued for the last full year
Photographic registration cards for self-employed individuals in the construction industry -CIS4	Solicitors letter within the last three months confirming recent house purchase or land registry confirmation of address
Benefit book or original notification letter from Benefits Agency	Council or housing association rent card or tenancy agreement for the current year
Firearms or shotgun certificate	Benefit book or original notification letter from Benefits Agency (but not if used as proof of name)

Proof of name	Proof of address
Residence permit issued by the Home Office to EEA nationals on sight of own country passport	HMRC self-assessment letters or tax demand dated within the current financial year
National identity card bearing a photograph of the applicant	Electoral Register entry or NHS Medical card or letter of confirmation from GP's practice of registration with the surgery

Documents we will not accept include, but are not limited to:

- Provisional driving licence
- Mobile phone bills
- Credit card statements

If you have visited a customer at their home address, a record of that visit will suffice as evidence that the individual lives at that address (i.e. as a second document).
For face-to-face transactions, colleagues should take a copy of the documents used to identify the customer and those copies should be retained with the customer's file.

Non-UK individuals
Identification of non-UK individuals may be undertaken using national identity cards, official correspondence from a government department or photo card driving licence. Colleagues should also be aware that many fraudulent documents are in circulation, and they should be carefully checked to ensure that they are genuine.

Refer to the MLRO for guidance on how to carry out identification checks on other entities.