



COUNTER TERRORISM AND ANTI-MONEY LAUNDERING POLICY

As a registered charity, Charity Right (the Charity) recognises the necessity to comply with charity law. This includes ensuring that its assets are safeguarded and properly used to meet its charitable objectives. We also have a duty to protect the public funds we receive. Our resources must not be used to support criminal or terrorist purposes.

This policy applies to all of the Charity's operations worldwide unless local legal requirements are more rigorous.

We will assess the risks of becoming involved with terrorism and money laundering, and of breaching applicable sanctions. We will put in place proportionate measures to manage those risks, while continuing to work in difficult and challenging places.

Charity Right is committed to:

- **having systems, procedures and controls in place to ensure that it manages the risk of becoming involved in financing or supporting terrorist activity, money laundering, or breaching sanctions**
- **for the highest risk transactions, checking that those Charity Right funds or works with are not on any lists of proscribed terrorist groups or persons, financial sanctions list or other regulatory compliance lists and assessing the risks if they are**
- **Ensuring country managers have awareness of the risks related to terrorist activity, money laundering, and breaching sanctions**
- **meeting its obligations to report to external authorities.**

We require all those receiving the Charity's funds in the UK to act in accordance with this policy to ensure that our funds and assets are not used to finance or support terrorist activity or to launder money.

This policy is necessary to comply with money laundering regulations and should be read within the context of wider finance and accounting procedures, confidentiality and data protection policies and procedures.

The offences in POCA 2002 apply to money or other property that someone has obtained through involvement in an activity that is criminal under UK law and that the offender knew or suspected to be such. TA 2000 applies to 'terrorist property'.

This is property that is likely to be used for terrorist purposes or the proceeds of terrorist acts, such as a reward for committing the act.

Charity Right

203 Westgate, Bradford, BD1 3AD

T: 01274 734839 E: info@charityright.org.uk



The Charity recognises that it is an offence to receive, retain or convert money or property known or reasonably suspected to fall into these categories.

Projects and Partners

The Charity works in countries which rank high on the **Global Terrorism Index (GTI)** on the annual report published by the Institute for Economics and Peace (IEP). Consequently, it recognises the need to carry out due diligence about the partner organisations it works with and the projects that it carries out.

The Charity endeavours to always work within the remit of its objects to empower Children, families and communities. Before engaging in a project, the project is discussed by the Board of Trustees and consideration is given to the following:

- Is the named project is a bona fide charitable endeavour?
- Is its work within the charity's objects?
- Are the trustees happy for the charity to support the project?

Donors

The Charity is committed to ensuring appropriate safeguards are in place to avoid the charity being used for money laundering purposes in accordance with our normal accounting and record-keeping procedures.

Procedure

All members of staff responsible for monitoring incoming funds will check the documentation associated with each item and verify the source of the funds.

Any anomaly in the documentation, or any unexpected amounts or payers, will be reported immediately to the Chief Executive who will investigate the item/s.

A report will be sent to the Trustee Board about anything which appears in the Charity's bank accounts, however, fleetingly, if it is not expected, or there is any concern about its source or documentation.

If the Trustees suspect money laundering, they will report this to the bank and the appropriate police authorities.

The Chair or the Treasurer, as the case may be, will direct what steps are to be taken to ensure the charity's compliance with all relevant money laundering regulations.

Charity Right

203 Westgate, Bradford, BD1 3AD

T: 01274 734839 E: info@charityright.org.uk

Resources:

<https://www.gov.uk/guidance/money-laundering-regulations-your-responsibilities>

<http://www.lawsociety.org.uk/support-services/advice/articles/quick-guide-to-the-money-laundering-regulations-2017/>

https://www.aat.org.uk/prod/s3fs-public/assets/Anti_Money_Laundering_Toolkit_Dec2016.pdf

The Money Laundering Regulations 2007 (MLR 2007)

The Terrorism Act 2000 (TA 2000)

The Proceeds of Crime Act 2002 (POCA 2002)