

MONEY LAUNDERING POLICY

LAST REVIEWED:

APPROVED BY THE BOARD OF TRUSTEES: 16/04/2024

DATE OF NEXT REVIEW: 16/04/2026



Good Vibrations takes its responsibility for ensuring the establishment and maintenance of systems of internal control for the prevention and detection of fraud, irregularities and corruption as non-negotiable and will not tolerate fraud, corruption or abuse of position for personal or institutional gain. It is therefore the policy of Good Vibrations to comply fully with applicable provisions of the Proceeds of Crime Act 2002, Terrorism Act 2000, Bribery Act 2010 and Money Laundering Regulations 2007 and all amending legislation.

1. MONEY LAUNDERING

By definition, money laundering is the practice of cleaning up money that has, for some reason, been obtained illegally. Often there is a complex trail involved so that the practice cannot be easily identified or traced.

Money laundering can occur in many ways. It may happen by dispersing money through many different bank accounts (to hide its origins), but can occur when the charity is used unwittingly as a “trading partner”. This could be directed at the charity or through an organisation where we have a close relationship, such as a funder.

2. DUE DILIGENCE

Good Vibrations will carry out procedures that help to identify donors, or other providers of income, before entering into a relationship or transaction with them.

Good Vibrations will, where applicable:

1. Identify the donor and verify their identity.
2. Take adequate measures where some donors need or want their privacy.
3. Accept that in some cases, the identity of the donor may not be easy to verify, in which case other measures need to be developed.
4. Continuously monitor the situation and;
5. Maintain proper records of all checks made.

3. DISCLOSURE

If anyone knows, suspects that a person is engaged in money laundering or terrorist financing, they must report such matters to the CEO immediately. Disclosure should be made in writing and requires:

- Details of the people involved
- Type of transaction
- The relevant dates
- Why there is a suspicion
- When and how activity is undertaken
- Likely amounts of money involved if known

The CEO will acknowledge receipt of the disclosure within 10 working days.

The funds will be frozen while an investigation takes place.

No communication about the freezing of funds, or investigation, should be made to the donor. If this happens the person making communication could be seen to be “tipping off” the donor, a criminal act.

The CEO will consider the report and any other information available and forward this to the Chair of the Board of Trustees.

Once the CEO has evaluated the disclosure or other information, they will work with the Chair of Trustees to determine if:

- There are reasonable grounds for suspecting money laundering and the steps to be taken; or
- There is actual money laundering or terrorist financing; and
- Whether they need to report the matter to the National Crime Agency (NCA).

All disclosure reports referred to by the CEO and reports made by them to the NCA will be retained for a minimum of 7 years.