

Therapy Dogs Nationwide Anti-Money Laundering Policy

Scope

Our charity is committed to preventing money laundering and complying with all relevant legislation and regulations. We have implemented due diligence measures and carry out risk assessments, put in place internal controls and monitoring systems to prevent money laundering.

Commitment

This policy statement provides a framework for how our charity will deal with the threat of money laundering. It is a useful tool for focusing our minds and those of our employees to make us constantly aware of the risks. We will review and update this policy regularly to ensure it remains effective and relevant to our charity's operations.

Named Individuals and Their Responsibilities

We have appointed a nominated officer who is responsible for ensuring that the charity's anti-money laundering policies and procedures are effective, and for reporting any suspicious activity to the relevant authorities. All employees and volunteers must be aware of their responsibilities under this policy.

Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of Therapy Dogs Nationwide (the "Charity"). Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Due Diligence Measures and Monitoring Checks

We have procedures in place for identifying and verifying organisations and individuals, such as contractors, partners and donors, which include obtaining identification documents, conducting risk assessments and monitoring checks. We will keep records of all due diligence measures carried out, including identification documents, risk assessments, policies, controls and procedures, and training records.

Training

We will ensure that all employees and volunteers are trained and aware of their responsibilities under this policy.

Monitoring Controls

We have put in place monitoring controls to ensure that our policies and procedures are being carried out effectively.

Sanctions

With the crisis in the Ukraine both the Commission and banks are focussing much more on the risk of breaching sanctions. This is a complex area as the sanctions applied can be to individuals, organisations or even countries, the sanctions applied vary and other countries also apply sanctions. In some circumstances a charity may obtain a licence from OFSI or rely on an exception in the legislation.

However, other than those exemptions, it is against the law to receive money, goods or economic resources from, or send these to, — an individual or organisation subject to financial sanctions. In the event of any grounds to suspect the charity may be involved, or may become involved with a sanctioned individual, organisation or work in a sanctioned country, the first step is to read the OFSI guidance below, then seek and comply with their advice.

Record Keeping

We will keep records of all customer due diligence measures carried out, including donor/contractor/partner identification documents, risk assessments, policies, controls and procedures, and training records.

Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	Sept 23	Initial draft approved	Annually

Regulatory Guidance

Gov.Uk –

- [-Your responsibilities under money laundering supervision](#)

Charity Commission.

- [Know your donor key questions.](#)
- [Know your partner, key issues to think about.](#)
- [Know you donor – checklist.](#)
- [Protecting charities from harm](#) – compliance toolkit.
- [Advice on suspect donations.](#)
- [Donations from outside the UK.](#)
- [End use of funds.](#)
- [Designated persons list.](#)
- [Tainted donations.](#)

OFSI

- [OFSI Charity Sector Guidance on Sanctions.](#)
- [UK Sanctions Guidance.](#)
- [UK Sanctions List](#)