



MONEY LAUNDERING POLICY

Scope of the Policy

This Policy applies to all trustees, directors, staff, volunteers, advisors and friends of Our Moon Education. The Policy sets out the procedures that must be followed to enable the charity to comply with its moral and legal obligations.

Our Moon Education must ensure that all trustees, directors, staff, volunteers, advisors and friends of Our Moon Education are aware of this policy by publicising it and making it available to download via the website.

Purpose

The legislative requirements concerning anti-money laundering procedures are lengthy and complex. This Policy has been written to enable the charity to meet the legal requirements in a way, which is proportionate to the very low risk to the charity

The purpose of this policy is to make all aware of the current legislation, their responsibilities, and the consequences of non-compliance with this policy.

If a trustee, director, member of staff, volunteer, or advisor suspects money laundering and either becomes involved with it in some way and/or does nothing about it, potentially they could have liability under money laundering regulation. This policy sets out how their concerns should be raised.

Whilst the risk to the charity of contravening the legislation is low, it is extremely important that all are familiar with their legal responsibilities.

When Money Laundering Might Be Suspected

The charity recognises that it could be used as a vehicle to carry out financial crime through the following ways:

- Money being offered as a loan to the charity for a period of time after which it is to be returned or sent elsewhere
- Donations being made which are conditional upon particular individuals or organisations, who are unfamiliar to the charity, being engaged to carry out work by the charity
- 'Loan' arrangements in which money is received by the charity in one currency but is to be returned to the donor in another
- Requests for assistance in recovering large sums of money where the charity is offered a percentage of the amount recovered.
- Unsolicited offers of short-term loans of large cash amounts, repayable by cheque or bank transfer, perhaps in a different currency

- Being asked to allow transactions to pass through the charity's bank account
- Offers of goods or services which seem very expensive, unusual or carry high administration and other charges
- Large cash donations.

Money Laundering Reporting Officer

The person nominated to receive disclosures about money laundering activity within the charity is the Chair of Trustees i.e. The Money Laundering Reporting Officer.

Reporting Procedure

Report all disclosures to the "Money Laundering Reporting Officer" or directly to the Serious Organised Crime Agency (see below which the right contact is to report to).

Where you know or suspect that money laundering activity is taking/has taken place, or become concerned that your actions in a matter may amount to your involvement, you must disclose this as soon as practicable possible to the "Money Laundering Reporting Officer".
SHOULD YOU NOT DO SO, THEN YOU MAY BE PERSONABLY LIABLE TO PROSECUTION.

If you feel the activity involves the Money Laundering Reporting Officer, you must report it directly to the Serious Organised Crime Agency (SOCA).
SOCA -24/7 telephone number for SOCA is 0370 496 7622

The postal address for SOCA is:
Serious Organised Crime Agency
PO Box 8000
London SE11 5EN
<http://www.soca.gov.uk>

Once you have reported the matter you must follow any directions, he/they may give you. You must NOT make any further enquiries into the matter yourself.

At no time and under no circumstances should you voice any suspicions to the person(s) whom you suspect of money laundering, or you may commit the criminal offense of "tipping off".

Deciding Whether to Report

The following factors should be taken into account when deciding whether to report, if in any doubt please seek the advice of the MLRO.

- Review other transaction patterns and volumes;
- The length of any involvement/relationship with the charity;
- The number of any one-off transactions and linked one-off transactions;
- Is there actual or suspected money laundering taking place; or
- Are there reasonable grounds to know or suspect that is the case; and



- Any identification evidence held; and undertake such other reasonable inquiries you think appropriate to ensure that all available information is considered in deciding whether to report.

Donor due diligence and identification

It is important to note that the charity receives the large majority of its donations from individuals via donation processing partners such as Enthuse, Benevity, and others. These are all reputable and established organisations that will have their own rigorous anti-money laundering, terrorist financing, donor identification and due diligence policies, processes and procedures in place including collection of personal data such as name, address and, in some cases, date of birth. In addition, donations are generally received via debit or credit cards issued by banks that will have done rigorous due diligence checks.

With reference to donations paid directly to the charity, for example by cheque, bank transfer and in cash, the charity will seek to establish the identity of any donor by requesting their name, address and other contact details such as email address and telephone number. Our bank account details are not publicly available.

There are a number of possible scenarios which, on their own or in combination, would warrant further donor due diligence being carried out, including:

- Donations of unusually large and unexpected amounts, either as a one-off or linked series of transactions, from unknown individuals, organisations or other sources new to the charity, especially those from overseas in excess of £1000
- Donations of unusual or very specific amounts
- Donations made in cash in excess of £500
- Unexpected or unexplained requests for the repayment of all or part of any donation.

In the above circumstances, the Charity must obtain satisfactory evidence of the identity of the prospective client/donor, as soon as practicable (unless evidence of the client has already been obtained). This applies to existing clients, as well as new ones.

In all cases, the evidence should be retained for at least eight years from the end of the business relationship or transaction(s). If satisfactory evidence of identity is not obtained, then the business/donation cannot progress any further.

Record Keeping Procedures

The charity will maintain records of:

- Identification evidence obtained; and kept for eight years from the completion of the transaction
- Details of all relevant business transactions carried out for clients/donor for at least eight years from the completion of the transaction. This is so that they may be used as evidence in any subsequent investigation by the authorities into money laundering and



- The precise nature of the records is not prescribed by law, however, they must provide an audit trail during any subsequent investigation, e.g. distinguishing the client/donor and the relevant transaction and recording in what form any funds were received or paid.

This policy was last updated 12/2023

