



Anti-Money Laundering (AML) Policy 2025

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Anti-Money Laundering (AML) Policy		
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Summary/Description:		
This document sets out the details pertaining to All Nations Christian College Anti-Money Laundering (AML) practices		
Edition 1 – First version in effect		

ALL NATIONS CHRISTIAN COLLEGE

To cultivate biblically rooted, hope-filled and culturally relevant engagement with God's mission by training and equipping disciples of Jesus Christ in partnership with the global church

ANTI-MONEY LAUNDERING POLICY

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2. COMMITMENT

All Nations Christian College is committed preventing money laundering and terrorist financing through its operations. As a registered charity, we recognize the risk that charitable funds may come from or be misused for illicit purposes. We comply with UK Money Laundering Regulations 2017, Proceeds of Crime Act 2002, and Charity Commission guidance.

Non-compliance with this legislation carries financial penalties and reputational consequences for both the College and its employees (including possible individual staff criminal prosecution that could result in up to 14 years imprisonment or a large fine). As such it is essential that the College and their staff are aware of the POCA offences and operate in accordance with policies and procedures that limit the risk of the College being used to launder money.

3. LEGISLATIVE FRAMEWORK

All Nations Christian College practices with regard to contributions of resources are in accordance with the following regulations, policies and procedures:

- Proceeds of UK Crime Act 2002 (POCA)
- UK Money Laundering Regulations 2017

Prevent legislation with the UK Counter-Terrorism and Security Act 2015

4. AIMS AND SCOPE

This policy outlines the measures that All Nations Christian College takes to prevent receipt or use of illicit funds or resources and the procedures to follow if the college identifies evidence or suspicion of such activity.

This policy applies to all employees, volunteers, Board members, and all people with whom it engages in business and legal relations.

5. DEFINITIONS

5.1. Key Money Laundering Definitions:

Anti-Money Laundering (AML): A general term which covers the measures to prevent money laundering, terrorist financing and use of proceeds of crime.

Money Laundering: Refers to concealing the origin of illicit funds or other resources. It is a scheme in which criminals try to disguise the identity, original ownership, and destination of money they have obtained through criminal conduct. The laundering is done with the intention of making it seem that the proceeds have come from a legitimate source.

Terrorist Financing: Refers to providing funds or other material support for terrorist activities.

Proceeds of Crime: Refers to any property, money, or assets obtained directly or indirectly through criminal activity in any jurisdiction. This includes cash, real estate, vehicles, investments, or any other valuables acquired as a result of unlawful conduct such as fraud, drug trafficking, money laundering, or corruption

Due Diligence: In this context it refers to verifying identity and legitimacy of stakeholders (such as donors, beneficiaries, and partners) and their funds and activities.

6. POLICY

This policy will apply when there is a likely possibility of illicit activity connected to the source or use of funds or other material resources

7. AML COMMITMENT

7.1. Top level commitment

All Nations Christian College is committed to tackling money laundering at the highest level. The College clearly articulates its zero-tolerance policy on money laundering in its practices.

7.2. Risk assessment

The College assesses risks in fundraising, donations, grants and overseas transfers. It applies enhanced checks for large or unusual donations, donations from hi-risk jurisdictions and complex or anonymous funding sources. The AML policy is reviewed annually in consultation with the Finance and Resources Committee and the Senior Leadership Team and reviews the risks presented by money laundering as part of this.

7.3. Due diligence

The College is committed to conducting appropriate due diligence on all third parties to mitigate the risk of money laundering.

The **Finance Department**, **Senior Leadership Team (SLT)**, and the **Board** are responsible for ensuring that due diligence is completed before entering into any contractual or partnership arrangements.

With regard to inbound resources this includes:

- Verifying identity for significant donations over £10,000 in one instance or cumulative thresholds.
- Understanding source of funds for high-value or unusual contributions.
- Screening donors against sanctions and watchlists.

With regard to outbound resources, this includes

- Verifying identity for significant suppliers, partners and beneficiaries where the value exceeds £10,000 in one instance or cumulative thresholds.
- Understanding the use of funds or other resources in line with our charitable objectives and legislative frameworks in countries of operation, for high-value or unusual contributions.
- Screening suppliers, partners and beneficiaries against sanctions and watchlists.

The **Finance Department Handbook (Section 12.1 – Procedure: New Supplier Verification)** outlines the process for verifying all new suppliers. This includes background and integrity checks to confirm business legitimacy, beneficial ownership, sanctions status, political exposure, and any adverse media or legal findings. Documentation is kept securely and filed on the Finance drive in the folder 2. Expenditure/Supplier details.

The same level of due diligence is applied by the SLT and the Board when establishing new donors, suppliers, partnership, significant beneficiaries, or strategic agreements.

No engagement, contract, or partnership may proceed until the due diligence process has been satisfactorily completed and approved. All findings and supporting documentation must be retained in accordance with the College's record-keeping requirements. Ongoing monitoring will be conducted for higher-risk relationships, and any red flags or concerns identified during or after the due diligence process must be escalated to the **Compliance Officer** or **SLT** for review before proceeding.

7.4. Communication and training

The College ensures that employees, volunteers and Board members receive training on the College's anti-money laundering policy when joining and then every two years.

8. PROCEDURES

8.1. Who needs to be checked?

The College has four main categories of counterparties who need to be checked:

- Donors,
- Suppliers,
- Partners, and
- Beneficiaries.

The risk of involvement with illicit activity and how it impacts the College varies depending on the type of counterparty.

For all counterparties the College:

- Verifies their identity
- Assesses materiality of the risk
- Keeps records regarding the identity and associated checks for 5 years (or as specified by the relevant jurisdiction)
- Undertakes ongoing monitoring

Depending on the type of counterparty and the materiality of the risk, other procedures may be implemented.

8.2. How are AML checks done

8.2.1. Donors

Donors may provide funds or donations in kind. The source of their funds (even if providing donations in kind) must be verified if the value of the donation (or the cumulative value of series of donations) exceeds a threshold of £10,000.

Identity Verification

When receiving significant funds, the finance department will collect and verify donor details including:

- Full name, date of birth, and address.
- Government-issued ID for high-value donations.
- Use reliable databases or tools to confirm identity and prevent impersonation.

Risk-Based Assessment

The finance department will assess donor risk based on:

- Donation size and frequency – additional checks triggered for donations in excess of £10,000 over a rolling two years period
- Geographic location – additional checks triggered for donations from high-risk countries
- Politically Exposed Person (PEP) – additional checks triggered for PEPs
- Relationship history with the organization – additional checks triggered if there is a significant change in an established pattern of donation.

Enhanced Due Diligence

Donations of £10,000 or above are classified as 'large donations' and will trigger enhanced due diligence including verification of donor identity, funds origin, and senior-level approval.

For large (in excess of £100,000) or unusual donations, the finance department will

- Request supporting documentation (e.g., bank statements, proof of income).

For international donors & donations from high-risk jurisdictions, the finance department will check

- Sanctions lists (UN, EU, OFAC)
- Politically Exposed Persons (PEPs) databases
- Publicly available media for adverse media or links to financial crime, corruption, or terrorism financing.

Ongoing Monitoring

The finance department will monitor donation patterns for:

- Large, unexpected contributions.
- Multiple anonymous or cash donations in a short period.

The donor checks for existing donors are refreshed every 3 years.

8.2.2. Partners

Partners may have formal or informal agreements or may be co-owners of assets or legal entities. Whilst the College does not usually have direct control of Partners, there is a risk that their activity may breach our commitment to AML.

Identity Verification

The finance department collects and verifies:

- Legal name, registration details, and business address
- Legal structure
- Beneficial ownership information to identify individuals who own or control the partner entity

Risk-Based Assessment

The finance department will assess partner risk based on:

- Geographic – additional checks are triggered for high-risk jurisdictions
- Industry – additional checks are triggered for organisations in high-risk industries
- Ownership – additional checks are triggered for complex or opaque ownership structures (shell companies, trusts, nominees).

Enhanced Due Diligence

For partners triggering Enhanced Due Diligence, partners and their beneficial owners are checked against:

- Global Sanctions lists (UN, EU, OFAC)
- Politically Exposed Persons (PEPs) databases
- Negative news or adverse media for links to financial crime, corruption, or terrorism financing.

The finance department also seeks to understand

- Partner's financial stability and source of funds.
- Nature of business activities and expected transaction patterns.

For very high-risk partners, the finance department also requests supporting financial statements or bank references.

Ongoing Monitoring

On engagement, partners are requested to inform the college on changes to:

- Change in ownership or control.

At least every three years the AML checks are renewed.

Where the partnership involves shared responsibility for transactions, the transaction patterns for anomalies.

8.2.3. Suppliers

Suppliers can be exploited for money laundering or terrorist financing through trade-based schemes, false invoicing, or complex supply chains. When onboarding or monitoring suppliers the College makes the following checks.

Identity Verification

When appointing a new incorporated supplier, the finance department collects and verifies:

- Legal name, registration details, and business address
- Incorporation documents
- Tax identification numbers
- Proof of operational address
- Company structure and beneficial ownership
- Registration with official authorities

When appointing a new individual or unincorporated supplier, the finance department collects and verifies:

- Full legal name, date of birth, and address
- Government-issued ID

Risk-Based Assessment

The finance department will assess donor risk based on:

- Size of expenditure – additional checks triggered for services or products where the expenditure (cumulatively over a two-year period is (or is likely to be in excess of £10,000)
- Structure – additional checks triggered when there are opaque or complex corporate structures
- Geographic – additional checks are triggered for high-risk jurisdictions
- Politically Exposed Person (PEP) – additional checks triggered for suppliers involved with PEPs
- Industry – additional checks are triggered for sectors prone to money laundering

Enhanced Due Diligence

For large expenditure, complex structures or prone industries, the finance department will

- Request supporting documentation (e.g. company accounts and their AML policy).

For suppliers (and their beneficial owners) from high-risk jurisdictions, the finance department will check

- Sanctions lists (UN, EU, OFAC)
- Politically Exposed Persons (PEPs) databases

- Publicly available media for adverse media or links to financial crime, corruption, or terrorism financing.

Ongoing Monitoring

On appointment, suppliers are requested to inform the college on changes to:

- Their compliance status
- Ownership or business structure

Every 3 years, the finance department verifies

- Identity
- Compliance status
- Ownership or business structure

As a normal part of the college's purchasing procedures, transactions can only be completed with confirmation of fulfilment of the legitimate use of funds.

In addition transaction patterns are monitored for anomalies.

8.2.4. Beneficiaries

Beneficiaries of the services or products of the college may constitute an AML risk. Beneficiaries include students and organisations using courses. In certain circumstances, the College may advance funds to further its charitable objectives. The most usual advance is to use bursary funds to pay for student education delivered by the college. Our Prevent Policy defines the steps we take to ensure that none of our activity supports Terrorist Activity.

When the advance is through an internal transfer by the finance department, the college has inherent confirmation of the appropriate use of funds.

Where the advance is through a Partner organisation, the Partner AML procedures apply.

In the rare circumstances where the advance is to a third-party, the following procedures apply.

Identity Verification

For individuals the finance department collects and verifies

- Full legal name, date of birth, and address
- Government-issued ID

For organisations the finance department collects and verifies

- Legal name, registration details, and business address
- Incorporation documents
- Tax identification numbers
- Proof of operational address
- Company structure and beneficial ownership

Risk-Based Assessment

The finance department will assess beneficiary risk based on:

- Geographic – additional checks are triggered for high-risk jurisdictions
- Industry – additional checks are triggered for organisations in high-risk industries
- Ownership – additional checks are triggered for complex or opaque ownership structures (shell companies, trusts, nominees).

Enhanced Due Diligence

For beneficiaries triggering Enhanced Due Diligence, partners and their beneficial owners are checked against:

- Global Sanctions lists (UN, EU, OFAC)

- Politically Exposed Persons (PEPs) databases
- Negative news or adverse media for links to financial crime, corruption, or terrorism financing.

Ongoing Monitoring

As a normal part of the college's purchasing procedures, transactions can only be completed with confirmation of fulfilment of the legitimate use of funds.

8.3. What to do if an AML issue has been identified

Identification of Suspicious Activity

Employees must remain vigilant for indicators of money laundering or terrorist financing, including:

- Unusual or inconsistent beneficiary information.
- Transactions that do not align with the beneficiary's profile or stated purpose.
- Attempts to avoid providing required identification or documentation.

Immediate Actions

If AML concerns arise:

- Do not alert the beneficiary (to avoid tipping off).
- Escalate internally to the Compliance Officer or SLT immediately.
- Document all observations and supporting evidence.

Investigation & Reporting

- The Compliance Officer or SLT will review the case and determine if they need to make a Suspicious Activity Report (SAR) to the National Crime Agency (NCA) and make a report to the Charity Commission or equivalent filing as required under applicable law.
- Cooperate fully with regulatory authorities during investigations.

Freezing or Blocking Transactions

- Where legally required, freeze or block transactions linked to suspected money laundering or sanctioned individuals/entities.
- Notify relevant authorities promptly as per jurisdictional requirements.

Record Keeping

- Maintain detailed records of all Suspicious Activity Reports (SARs), investigations, and actions taken for at least 5 years or as required by law.

8.4. What to do if AML Checks Cannot Be Completed

If the College is unable to complete the required AML checks due to missing information, refusal to provide documentation, or inability to verify identity:

Immediate Actions

- Do not proceed with any payments, transfers, or benefits until checks are completed.
- Escalate the case to the Compliance Officer or SLT for review.

Risk Assessment

- Assess whether the inability to complete checks indicates a high-risk scenario or potential money laundering.
- Consider whether Enhanced Due Diligence (EDD) or alternative verification methods are possible.

Decision Process

If verification remains incomplete:

- Reject the transaction or relationship.
- Terminate onboarding for the beneficiary.
- Document the reasons for non-completion and actions taken.

Reporting

If suspicion of money laundering or terrorist financing exists:

- File a Suspicious Activity Report (SAR) to the National Crime Agency (NCA) or equivalent with the relevant authority.
- Make a report to the Charity Commission.
- Maintain confidentiality and avoid tipping off the beneficiary.

Record Keeping

Keep detailed records of:

- Attempts made to complete checks.
- Communications with the beneficiary.
- Final decision and any reports filed.

9. ROLES, RESPONSIBILITIES, POLICY APPROVAL AND REVIEW

The **Board of Trustees** has legal oversight and responsibility for all College policies, providing leadership and active support for them and being responsible for ensuring that:

- A legally compliant and fit for purpose AML policy is in place and approved by them.
- Satisfactory arrangements are made for its effective implementation, including the provision of resources.
- The Senior Leadership Team monitors, evaluates and periodically reviews this policy and recommends any changes to first the Finance and Resources Committee and then the Board of Trustees for approval.
- Investigations brought under the terms of this policy are managed satisfactorily by the Senior Leadership Team.
- Decision-making complies with all relevant legislation and regulatory bodies.
- They receive details from the Senior Leadership Team of reported incidents and outcomes of cases (particularly where AML checks could not be completed, a significant impact on someone has occurred or lessons need to be learned), or of a serious incident or one which could be of reputational risk to the College which should be reported to either the National Crimes Agency (NCA), Office for Students and/or the Charity Commission.

The **CEO and Senior Leadership Team** are responsible for:

- The implementation and management of this policy; ensuring that procedures are implemented consistently and with clear lines of authority and actively and visibly leading the College's AML policy and practice.
- Ensuring the principles of this policy are incorporated into all aspects of the College's business practices
- Ensuring this policy is continually improved in consultation with students and staff.
- Conducting and overseeing College-wide money laundering risk assessments, ensuring they are documented, regularly reviewed (at least annually or when significant changes occur), and reported to the Finance and Resources Committee and Board of Trustees. Monitoring, evaluating and periodically reviewing this policy and for obtaining approval from the Finance and Resources Committee and the Board of Trustees for any changes made.
- The management of investigations.
- Ensuring decision-making complies with all relevant regulatory bodies.
- Reporting details to the Board of Trustees of reported incidents of outcomes of cases (particularly where AML checks could not be completed, a significant impact on someone has occurred or lessons need to be learned), or of a serious incident or of one which could be of reputational risk to the College.

The Head of Finance is responsible for :

- Ensuring that the principles of this policy are incorporated into all aspects of the College's financial management including those related to donors, suppliers, partners and beneficiaries.
- Leading on financial risk assessments related to money laundering, ensuring controls are in place and effective, and feeding results into the College-wide AML risk review process.
- Ensuring that these policies are continually improved in consultation with staff.

The **Finance Team** under the supervision of the Head of Finance is responsible for implementing the risk assessments, checks and recording keeping.

Senior Leadership Team, Head of Finance and Departmental Heads are responsible for liaising with one another to ensure any projects are properly planned and that the risks involved are assessed and managed in line with this policy.

All individuals across the College are responsible for:

- Familiarising themselves with this policy on appointment/at induction/orientation;
- Demonstrating an active commitment to this policy by:
 - treating others with integrity
 - reporting all money laundering cases that they become aware of via the procedures laid out in this policy.
 - challenging instances where money laundering could occur.
- If **involved in an investigation**, whether those making an allegation or those being accused of money laundering according to the terms of this policy:
 - ensuring they present their case with integrity and in a timely fashion and/or
 - ensuring they comply with any investigation and the procedures in this policy.

The HR Lead is responsible for managing the administration of any investigation process.

10. POLICY COMMUNICATION

This document can be found on the College website: www.allnations.ac.uk.

The Finance department will make every effort to respond to any request to provide this policy in a different format. Such requests should be sent to info@allnations.ac.uk.

This policy will be included in staff induction and staff are to receive training on AML principles every two years. This training will be rolled out following the implementation of this policy from 15th December 2025.