

**Merton Mencap**

**Anti Money-Laundering  
Policy and Procedure**

**July 2017**



**Merton Mencap**  
**Anti Money Laundering**  
**POLICY & PROCEDURE**

**This policy and procedure has been adopted by Merton Mencap through its Executive Committee which remains responsible for its review.**

**Original signed version is kept at the Merton Mencap office.**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_

**Chair of Executive Committee**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_

**Chief Executive**

**Record of adoption and review of this policy and procedure:-**

**Adopted:** 16 September 2009  
**Reviewed:** 28 June 2011  
**Reviewed:** 29 April 2014  
**Reviewed:** 14 July 2017

# **Merton Mencap**

## **ANTI-MONEY LAUNDERING POLICY & PROCEDURE**

### ***POLICY***

This policy is necessary in order 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.

Merton Mencap 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, all incoming funds are required to be supported by documentation evidencing their source. We receive money from various sources and every reasonable effort is made to verify those sources.

### ***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 Merton Mencap's bank accounts, however fleetingly, if it is not expected, or there is any concern about its source or documentation.

Particular vigilance should be applied to:

- Unsolicited donations offered at short notice or via an unknown third party
- Donations offered in the form of a loan
- Donors who ask for all or part of a donation to be returned at a later date
- Donations offered for a specific project where the donor insists that a particular third party is used as a partner or supplier on the project
- Donations that are conditional upon the donor having control over a revenue or investment benefit from the donation, such as a share of income generated by the donation or the transfer of surplus capital at the donor's behest
- Payments from any organisation that are to be held in a Merton Mencap bank account for a period of time and then returned to the organisation or passed onto another organisation (known as conduit funding)
- Donations that have unusual or disproportionate conditions attached

- Donations where there are grounds for reasonable suspicion that it represents the proceeds of crime, or is not legally or legitimately owned by the donor
- Proposals that Merton Mencap should make offers of financial support, or loans of property or facilities

If any of the above apply, the potential donation should not be accepted but should be referred to the Chief Executive (or in his/her absence the Chair of Trustees) who will bring it to the attention of trustees at the next possible Executive Committee Meeting.

Donations should be refused and the potential donor reported to the Chief Executive (or in his/her absence to the Chair of Trustees) if:

- Donations are offered in foreign currencies (especially on condition that all or part of the principal sum should be returned to the donor in sterling)
- Donations are offered anonymously or through an intermediary who is not prepared to identify the donor
- The donor is believed to have acted illegally in the acquisition of funds, for example where funds are tainted because they may be the proceeds of crime
- The donor is not believed to have legal or legitimate ownership of the funds or the gifts in kind offered to the charity

If the Trustees suspect money laundering as a result of these situations or others, they will report this to the bank and to the appropriate police authorities.

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