Christ the Redeemer College
London

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Amendment History

Version	Revision Summary	Date Approved	Author

Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy

1. Policy Statement

1.1 Christ the Redeemer College is committed to preventing money laundering, terrorist financing, fraud, bribery, corruption, and any other financial crime. The College will comply with all applicable legislation, regulations, and guidance relating to Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF).

1.2 The College recognises its responsibility to maintain effective systems and controls to identify, assess, manage, and mitigate the risks of money laundering and terrorist financing.

2. Purpose

2.1 The purpose of this policy is to:

- Protect the College from being used for money laundering or terrorist financing activities.
- Ensure compliance with relevant legislation and regulatory requirements.
- Establish procedures for identifying, assessing, and reporting suspicious activities.
- Promote awareness among staff and stakeholders regarding financial crime risks.

3. Scope

3.1 This policy applies to:

- Members of the Governing Board.
- Senior Management Team.
- Employees and contractors.
- Consultants and agents acting on behalf of the College.
- Students where applicable to financial transactions with the College.

4. Legal and Regulatory Framework

4.1 The College will comply with applicable legislation including:

- Proceeds of Crime Act 2002 (POCA).
- Terrorism Act 2000.

- Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 (as amended).
- Fraud Act 2006.
- Bribery Act 2010.
- Any subsequent legislation, guidance, or regulatory requirements.

5. Definitions

Money Laundering

5.1 Money laundering is the process of concealing, disguising, converting, transferring, or acquiring criminal property to make it appear legitimate.

Terrorist Financing

5.2 Terrorist financing involves providing, collecting, or using funds with the intention that they may be used to support terrorist activities.

6. Risk Assessment

6.1 The College shall conduct periodic assessments of the risks associated with:

- Student fee payments.
- Donations and sponsorships.
- International transactions.
- Third-party suppliers and contractors.
- Partnerships and collaborative arrangements.

6.2 The College will apply proportionate controls based on identified risks.

7. Due Diligence Procedures

7.1 The College will undertake appropriate due diligence measures, including:

7.1.1 Student Payments

- Verifying student identity where necessary.
- Monitoring unusual payment patterns.
- Investigating payments from third parties where appropriate.

7.1.2 Donors and Sponsors

- Verifying the identity of significant donors and sponsors.
- Assessing the source of funds where concerns arise.

7.1.3 Suppliers and Partners

- Conducting checks on new suppliers, contractors, and strategic partners.
- Maintaining records of due diligence undertaken.

8. Suspicious Activity Reporting

8.1 All staff must remain vigilant and report any concerns regarding suspicious transactions or activities.

8.2 Examples may include:

- Unusual cash payments.
- Requests to refund payments to a different account.
- Multiple payments from unrelated third parties.
- Attempts to conceal the source of funds.
- Transactions that appear inconsistent with normal business activity.

8.3 Any concerns should be reported immediately to the Principal or designated Money Laundering Reporting Officer (MLRO).

9. Record Keeping

9.1 The College will maintain adequate records relating to:

- Student payment transactions.
- Due diligence checks.
- Suspicious activity reports.
- Relevant correspondence and investigations.

9.2 Records shall be retained in accordance with the College's Data Protection and Records Retention Policies.

10. Training and Awareness

10.1 The College will provide appropriate training and awareness to relevant staff to ensure they:

- Understand AML and CTF risks.
- Recognise suspicious activities.
- Understand reporting procedures.
- Comply with this policy.

11. Confidentiality and Protection

11.1 Any individual reporting concerns in good faith will be protected from retaliation and victimisation.

11.2 Reports will be handled confidentially and in accordance with applicable legal requirements.

12. Policy Breaches

12.1 Failure to comply with this policy may result in disciplinary action and, where appropriate, referral to law enforcement agencies or regulatory authorities.

13. Policy Breaches

13.1 This policy will be reviewed annually or sooner where legislative, regulatory, or operational changes require amendment.