

HULME GRAMMAR SCHOOL

ANTI MONEY LAUNDERING POLICY

This policy is applicable from EYFS through to year 13

1 INTRODUCTION

- 1.1 It is the policy of the School to comply fully with applicable provisions of the Proceeds of Crime Act 2002 (as amended by the Serious Organised Crime and Police Act 2005), the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, the Terrorism Act 2000 and all amending legislation. In addition, it aims to fully comply with the guidance issued by the Charity Commission in respect of the protection of charities from fraud and financial crime.
- 1.2 The purpose of this policy is to ensure the School's compliance with all anti-money laundering (AML) laws and regulations as detailed above, to assist law enforcement in combating illegal money laundering, and to minimise the risk of the School's resources being used for improper purposes.
- 1.3 By definition, money laundering is the practice of cleaning up money that has, for some reason, been obtained illegally. Acquisitive criminals will attempt to distance themselves from their crime by finding safe havens for their profits where they can avoid confiscation orders, and where those proceeds can be made to appear legitimate.
- 1.4 Money laundering can occur in many ways. It may happen by dispersing money through many different bank accounts (to hide its origins), but can also occur when the School is used unwittingly as a 'trading partner'.

2 SCOPE

- 2.1 This policy aims to ensure that the School prevents, where possible, the commission of a criminal offence and therefore should be read in conjunction with the School's Anti-Corruption and Bribery policy.
- 2.2 This policy applies to everyone involved in the School, including the Governors, senior leadership team, employees, volunteers, suppliers, contractors and consultants.
- 2.3 The Governors are required to ensure everyone is aware of this policy, has access to it and receives appropriate comprehensive and up to date training on it.
- 2.4 Failure to comply with this policy can lead to disciplinary action.

3 PROCEDURES

- 3.1 The Governors will be responsible for maintaining and updating as appropriate the School's AML procedures.
- 3.2 The Governors will receive disclosures from anyone involved in the School of any suspected money-laundering activities. These may come to the Governing Body via the Principal, or from School staff directly, if appropriate..
- 3.3 The Governors will ensure that adequate records are maintained to evidence the School's compliance with this AML policy including all staff disclosures and any key decisions

relating to the management of the money laundering risk including, where appropriate decisions resulting from informal conversations.

4 DUE DILIGENCE

- 4.1 The School should carry out procedures that help it identify donors, partners, grantees and pupils and their families (Partners) before accepting or entering into a relationship or transaction with them.
- 4.2 The School should, where applicable:
 - 4.2.1 identify the Partner and verify their identity and address;
 - 4.2.2 must take adequate measures where some Partners need or want their privacy intact;
 - 4.2.3 accept that in some cases, the identity of the Partner may not be easy to verify, in which case the Governors should consider what other measures they should take to satisfy themselves of the source of funds, taking further advice where necessary;
 - 4.2.4 continuously monitor the situation; and
 - 4.2.5 maintain proper records of all checks made.

5 POLICY ON DISCLOSURE

- 5.1 If anyone knows, suspects or has reasonable grounds for thinking or suspecting that a person is engaged in money laundering or terrorist financing, they must immediately report such matters to the Principal, or if necessary to the Governing Body directly. Disclosure should include:
 - 5.1.1 details of the people involved;
 - 5.1.2 type of transaction and the relevant dates;
 - 5.1.3 why there is suspicion;
 - 5.1.4 when and how the activity is undertaken; and
 - 5.1.5 where known, the likely amounts, etc.
- 5.2 The Principal or Governors will acknowledge receipt of the disclosure within an agreed response period.
- 5.3 If a disclosure is made to the Principal they will immediately report the matter to the Governors. The Governors will consider the disclosure report and any other available information. All disclosures made to the Head and thereafter the Governors must be held in strict confidence and should not at any point be disclosed to the party/individual to whom it relates.
- 5.4 Once the Governors have evaluated the disclosure or other information, they will determine if:

- 5.4.1 there are reasonable grounds for suspecting money laundering and the steps to be taken; or
 - 5.4.2 there is actual money laundering or terrorist financing; and
 - 5.4.3 whether they need to report the matter to the National Crime Agency (NCA) via a suspicious activity report (SAR), as noted below.
- 5.5 Where the Governors know or suspect money laundering they must report this to the NCA. This should be by way of a SAR and there should be no unwarranted delays in making such a report.
- 5.6 Where a SAR has been made to the NCA the Governors, Head or any other person at the School who may be aware of the SAR must not inform or notify the party/individual to which the report has been made that:
- 5.6.1 a lawful disclosure has been made; or
 - 5.6.2 that there is a money laundering investigation taking place.

Failure to comply with this may prejudice an investigation and could result in the commission of a criminal offence under section 333 of the Proceeds of Crime Act 2002.

- 5.7 All disclosure reports referred to the Principal or Governors and reports made by them to the NCA will be retained for a minimum of five years.

Anti Money Laundering policy reviewed: February 2024

Next Review Due: February 2027