



Anti-Money Laundering (AML) Policy

This is a non-contractual policy, subject to review on an ongoing basis (at least once a year). Time to Help UK will amend this policy, following consultation, where appropriate.

Date of last review: 17/07/2025

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1. Policy Statement and Purpose

Time to Help (UK) is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This Anti-Money Laundering (AML) policy outlines our stance against money laundering and terrorist financing. We adhere strictly to the laws and regulations governing such activities, including but not limited to the Proceeds of Crime Act 2002, the Terrorism Act 2000, and the Money Laundering Regulations 2007.

The purpose of this policy is to set out our responsibilities in observing and upholding our position against money laundering and terrorist financing. It also aims to ensure that all employees, volunteers, and affiliates of Time to Help (UK) understand and comply with these obligations. This policy forms a fundamental part of our commitment to legal compliance and the protection of our organisation and its resources from being used to facilitate financial crime.

Through this policy, we seek to prevent, identify, and report any instances of money laundering and terrorist financing, thereby maintaining the integrity and transparency of our operations. We aim to foster a culture of awareness and vigilance across our organisation, ensuring that all activities are conducted ethically, legally, and in alignment with our mission of helping those in need.

2. Guidelines and Resources considered

Time to Help (UK) has considered and reviewed a wide range of legislation, professional guidelines, policies and tools to formulate its AML policy. This is to ensure that the policy created is of the highest quality which can be proved effective in mitigating any potential AML or TF risks.

The sources mentioned in the following list have paved the way of the AML policy we abide by at Time to Help (UK):

- **Legislation:**
Proceeds of Crime Act 2002 (POCA), Money Laundering Regulations 2017, Terrorism Act 2000 and Bribery Act 2010.
- **Guidelines:**
Charity Commission Guidelines, Financial Action Task Force (FATF) guidelines.
- **Analytical Tools:**
SWOT, PESTLE and RISK ASSESSMENT TOOLS.

3. What is Money Laundering?

Money laundering is the illegal process of making large amounts of money generated by criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source. The process is concerned with disguising the origins of illegally obtained money, ultimately integrating it into the legitimate economy.

Money laundering typically involves three key stages:

- 3.1.Placement:** Introducing illicit funds into the financial system.
- 3.2.Layering:** Concealing the source of the funds through a series of transactions and bookkeeping tricks.
- 3.3.Integration:** The laundered money is reintroduced into the economy, appearing as legitimate funds.

Understanding these stages helps in detecting and preventing money laundering. Our organisation must be vigilant in identifying activities or transactions that may be indicative of money laundering as part of our commitment to legal compliance and ethical responsibility.

4. Potential Risks and Time to Help's Vulnerability

Time to Help (UK), in its noble pursuit of charitable activities, may be inadvertently exposed to money laundering risks. Due to our diverse range of operations, including international activities, donations, and varied funding sources, Time to Help (UK) might be seen as an attractive channel for money launderers. The public respectability we carry as a charity, in particular, may persuade non-charitable enterprises to associate with us to conceal any of their dubious or criminal purposes.

Key areas of vulnerability include:

- 4.1.Donations:** Large or irregular donations from anonymous or high-risk sources could be attempts to launder money.
- 4.2.International Operations:** Our activities in regions with less stringent financial regulations or high levels of corruption may be exploited for laundering funds.
- 4.3.Volunteer and Employee Misuse:** Individuals within the organisation could misuse their positions to facilitate money laundering.
- 4.4.Partnerships and External Engagements:** Collaboration with external entities, if not properly vetted, could involve us in transactions that serve as fronts for laundering.
- 4.5.Financial Transactions and Grants:** Complex financial dealings or grants, especially those involving cross-border elements, could be manipulated for laundering purposes.

Recognising these risks, Time to Help (UK) is vigilant and proactive in implementing robust checks and balances to prevent and detect any misuse of our operations for money laundering.

5. The Law

In the UK, the legal framework for Anti-Money Laundering (AML) is primarily governed by several key pieces of legislation:

- 5.1. Proceeds of Crime Act 2002 (POCA):** This is the cornerstone of the UK's AML laws. It includes provisions for the confiscation, civil recovery, and investigation of proceeds from crime.
- 5.2. Money Laundering Regulations 2017:** These regulations set out detailed requirements for risk assessments, due diligence, and record-keeping for businesses. They require certain businesses to monitor their customers and report suspicious activities.
- 5.3. Terrorism Act 2000:** This act addresses terrorist financing and includes provisions that make it a crime to hold or make funds available for terrorist purposes.
- 5.4. Bribery Act 2010:** Though primarily focused on bribery, this act intersects with AML in cases where bribery is used to facilitate money laundering.

These laws are enforced by several UK authorities, including the Financial Conduct Authority (FCA), HM Revenue and Customs (HMRC), and the National Crime Agency (NCA). Compliance with these laws is mandatory for organisations and individuals engaged in financial business and other activities vulnerable to money laundering.

6. Charity Commission Guidelines

The UK Charity Commission provides comprehensive guidelines for charities to conduct due diligence, monitor transactions, and verify the end use of charitable funds. These guidelines are crucial for charities like Time to Help (UK) to ensure that they are not inadvertently used for money laundering or financing terrorism.

Key aspects and available tools are:

- 6.1.1. Due Diligence Requirements:** Trustees must carry out due diligence checks on donors, beneficiaries, and local partners and monitor the end use of funds. The Charity Commission's guidance underscores the legal duties and responsibilities of trustees in conducting these checks, managing associated risks, and ensuring proper monitoring and verification of funds.

6.1.2. Risk Assessment Cycle (Tool 1): This tool guides charities through the process of assessing risks associated with their operations and financial dealings.

6.1.3. SWOT Analysis (Tool 2): Strengths, Weaknesses, Opportunities, and Threats analysis helps in identifying internal and external factors that could impact the charity's vulnerability to financial abuses.

- **Strengths:** Time to Help (UK) has put in place a robust system to prevent money laundering by identifying its internal strengths surrounding finance and expenditure transparency. These strengths are the cornerstone of its procedures in combatting any risks that might occur.
- **Weaknesses:** Time to Help (UK) has not discovered any major weaknesses in the management of its finance, however, a few elements regarding staff training could be improved. Therefore, it has made arrangements to provide relevant training to the staff regarding risks associated with ML and TF. These initiatives will be repeated on an annual basis to ensure that the individuals are up to date with the necessary 'to-dos' in such unfortunate situations.
- **Opportunities:** Time to Help (UK) has set up initiatives to improve its risk management assessments and provide the staff with the relevant training to make its AML efforts more efficient. The charity has identified opportunities to collaborate with other non-profit organisations in the same boat to come up with effective techniques in combatting ML threats to secure their stakeholders.
- **Threats:** Time to Help (UK) will keep reviewing its frameworks, policies and governmental procedures to ensure that it is updated with all the consequences and threats of ML breaches.

6.1.4. PESTLE Analysis (Tool 3): Analysing Political, Economic, Social, Technological, Legal, and Environmental factors helps in understanding the broader context in which the charity operates and potential risks.

6.1.5. Risk Matrix (Tool 4): This tool helps in categorising and prioritising risks based on their likelihood and potential impact.

6.2. Monitoring and Verification Tools:

6.2.1. Risk Assessment Checklist (Tool 5): A checklist to ensure all aspects of risk assessment are covered.

6.2.2. Know Your Donor - Key Questions (Tool 6): A set of questions designed to vet donors and understand their motivations and the origins of their funds.

6.2.3. Suspicious Donations Log Template (Tool 7): For recording and monitoring donations that raise suspicions.

6.3. Partnership and Collaboration Tools:

6.3.1. Know Your Partner - Key Issues (Tool 8) and Verification of Proposed Partner - Form Template (Tool 9): These tools assist in evaluating and verifying the credibility and legitimacy of potential partners.

6.3.2. Outline Partnership Agreement (Tool 10): A template for drafting agreements with partners that include clauses to mitigate money laundering risks.

6.4. Project and Grant Monitoring Tools:

6.4.1. Grant Monitoring Report - Declaration by Partner Organisations (Tool 11) and Monitoring Visit Checklist (Tool 12): These tools help ensure that grants and projects are executed as intended and funds are used appropriately.

6.5. Inspection and Compliance Tools:

6.5.1. Options for On-site Inspections (Tool 13) and Monitoring Visit Log (Tool 14): Providing frameworks for conducting on-site inspections and maintaining records of such visits.

6.6. Project Oversight Tools:

6.6.1. Project Monitoring Checklist (Tool 15) and Due Diligence - Core Principles (Tool 16): These tools are designed to oversee project execution and ensure that due diligence principles are consistently applied throughout the charity's operations.

Adopting these tools and guidelines will significantly enhance Time to Help's capabilities in managing the risks associated with money laundering and ensuring that all funds are used in alignment with the charity's objectives and legal obligations.

7. The Financial Action Task Force (FATF) AML guidelines:

The Financial Action Task Force (FATF) is a global anti-money laundering and anti-terrorist financing organisation which provides international standards and guidelines

to prevent illicit financial activities. Time to Help (UK) is committed to implement these guidelines and uphold these standards in its practices to ensure that it is fully prepared to combat any illegal threats restricting its ability to make the world a better place.

It will take upon the following initiatives to lower the risks of such threats:

- 1) Time to Help (UK) will undertake detailed risk analysis before working in new areas/environments or with new partners. Despite having long standing and trustable relations with their current partners, Time to Help (UK) will also re-conduct risk analysis to ensure that they have not developed any unethical agendas or motivations.
- 2) The charity will conduct such risk assessments on a yearly basis for thorough satisfactory analysis of the countries/partners it will work with. Time to Help (UK) will consider reviewing the national TF abuse reports to understand the degree of TF risks in the countries it operates. Furthermore, it will review the audit reports of its partners to effectively analyse the compliance risks associated with them and to discover any previous malpractice conducted.
- 3) If Time to Help (UK) finds any TF risk factors, it will determine the likelihood of such risks and their impacts on its values and practices. This will help it calculate the effectiveness of its current internal control measures in mitigating those AML and TF risks. Time to Help (UK) will revise its internal control measures if they are found to be inadequate.
- 4) Time to Help (UK) is aware of the impact of potential money-laundering and TF activities on its organisation, staff and the community. Therefore, it will ensure to review its internal control measures yearly to be updated on any developments. These measures will also be reviewed after any major organisational change including but not limited to merging and expansion.
- 5) Due to its small size and structure, Time to Help (UK) is not required to have a professional audit conducted on its operations. However, in case of any major changes or identification of the risk factors, the organisation will consider inviting a professional auditor to conduct an independent audit on its activities. This will help in assessing any ML or TL risks and adapt to any changes.

Self – Regulatory Measures:

- 1) Time to Help (UK) is committed to take self-regulatory measures, including training and raising self-awareness among its staff, donors and partners regarding ML and TF concerns. It is passionate in implementing these initiatives internally (for its employees and donors) and in external jurisdictions (for its partners and international donors) to educate them about the existence of various threats. Adopting such measures will ensure the compliance of Time

to Help's stakeholders to ethical practices, preventing the occurrence of any illicit activities.

- 2) Time to Help (UK) is in coordination with numerous dominant non-profit organisations in the UK through seminars and personal meetings. This is helping the charity revolutionise its methods of operation by learning from the experiences of the organisations that have been impacted by any ML or TF risks— allowing Time to Help (UK) to compare its risk management mechanisms to those affected and strengthen them by filling any gaps.

Internal Governance and Control Measures:

Time to Help (UK) is aware of the significance of good governance and strong financial management resources in combatting ML and TF threats. Therefore, it will adopt robust internal and financial controls built on its domestic ML and TF risk assessment, the legislation requirements and the regulator (the charities commission) guidelines. This will allow Time to Help (UK) to fulfil its responsibility as a well-respected non-profit organisation by identifying any potential risks and following the protocol to deal with them immediately.

Time to Help (UK) has grouped its governance practices into the four categories. These categories have been established to cover all the relevant factors which can either boost the ML and TF risks or mitigate their effects. Following are the four categories:

a) Organisational Integrity:

Time to Help (UK) has created effective governance documents which incorporate its purpose, policies, reporting practices and much more. These documents also include a whistleblowing mechanism which provides the employees with the freedom to report any unethical or illegal activities anonymously. This mechanism will assist Time to Help (UK) in identifying any malpractice committed by its employees or board members, mitigating any ML or TF risks.

b) Partner and Donor Relationships:

Time to Help (UK) takes various reasonable steps to verify the validity of its donors and partners' identities and sources of finance. It has developed a selection criterion which includes researching reliable publicly available information and asking for more clarification (if required) through correspondence. Furthermore, the charity will also make use of reliable domestic and UN resources, including sanction lists to target and screen its partners to ensure their validity.

c) Financial Accountability and Transparency:

Time to Help (UK) ensures to be at the top of each of its projects to monitor their cash flows. It believes in keeping their financial records (i.e transactions and authorisation of those funds) to prevent any financial abuse and misuse of its resources. Time to Help's annual budget is approved by the four board members who also then monitor the funds throughout. This reduces the risk of any unethical practices as the financial control is not solely in the hand of a single individual. Furthermore, the payment and transfer decisions are approved by the Money Laundering Reporting Officer (Mr Yusuf Kar) who is well-aware of the ML and TF risks involved in such transactions. Therefore, he is best suited to ensure that there are no instances of any illicit activities. Any international transactions are required to be approved by two members: Yusuf Celik (International Programme Manager) and the MLRO. They work closely in coordination to ensure that the funds are being delivered where they are expected. Lastly, Time to Help (UK) also seeks professional accountancy assistance and its accounts are constantly reviewed by well-reputed accountants which further mitigates any risks of illegal financial activities.

d) Programme Planning and Monitoring:

Time to Help (UK) also mitigates the risks of illicit financial activities through effective planning and monitoring of its projects. This helps the charity ensure that the purpose for which it is collecting the fund is being fulfilled. It creates the budget of each project separately and all the expenditure is recorded through detailed project reports and receipts which helps it eliminate any risks associated.

8. Red Flags

After conducting a thorough analysis of its environments, operations and people using various analytical tools including SWOT and PESTLE, Time to Help (UK) has developed a comprehensive list of risks which are to be constituted as "Red Flags". These "Red Flags" are circumstances which can give rise to potential ML activities. Hence, the staff at Time to Help (UK) has been trained to successfully identify and report them.

Following are circumstances to be constituted as "Red Flags" in Time to Help's process of fundraising:

Unusual Transactions: Unexpected transactions which seem unusual due to their large size, constant frequency or any dubious manner of execution shall be investigated. The MLRO along with the reporting staff will cross-reference those transactions with the donor's reputation, previous contributions and source of

income. This will help Time to Help (UK) to identify any potential risks and, in the case of their existence, report them to the relevant authorities timely.

Suspicious behaviour: Time to Help (UK) has provided through training to its staff in studying the behaviour of the donors. It is equipped to deal with the donors which are anxious in making transactions or desire their payments to be processed unusually quicker. In such situations, the staff will initially conduct research about the donor's reputation through available public information. Finally, they will report to MLRO if there is any uncertainty or risk.

Frequent or large repayments: Time to Help (UK) has a 'no refund policy'. It will only consider providing a refund if it is certain that the donor has mistakenly donated due to choosing a direct debit donation instead of a 'one time'. In such circumstances, Time to Help (UK) will first verify the identity of the donor and only refund the amount to the same account the donation was received from. The donors requesting unexplained large repayments shall be investigated. The donors which have requested repayments on multiple occasions will also be thoroughly investigated to ensure that they are not involved in any unethical activities. Time to Help (UK) will freeze their payments if anything unsuspecting or unreliable is discovered about them. Their details will be forwarded to the relevant acting authorities and the charity will seek their guidance on the payments held.

Controversial individuals: Time to Help (UK) will conduct thorough due diligence on donors which are known to have been involved in suspicious activities. The charity will respect the anonymity of its donors; however, it will be investigating any amounts more than £5000. This investigation will be conducted through publicly available reliable information. The charity, per the Charity Commission's guidelines, will not further investigate any donations made by the institutions governed by the FCA. Similarly, any individuals making the donations through FCA regulated institutions will also not be investigated. Background checks might be conducted by the charity if it sees fit to ensure that the donations are being made in good faith.

Payment Procedures: The staff will mark the donation procedures which seem complex, confusing or illogical. Since money laundering is a layered process, Time to Help (UK) will review the structures of any suspicious payment procedures separately to ensure the effectiveness of its investigations.

9. Scope And Responsibilities

9.1. Trustee Responsibilities

Time to Help's trustees play a pivotal role in the governance and ethical oversight of the charity. Their responsibilities in relation to Anti-Money Laundering (AML) include:

- 9.1.1. Oversight and Compliance:** Ensuring that the charity remains compliant with AML legislation, including the Proceeds of Crime Act 2002, the Terrorism Act 2000, and the Money Laundering Regulations 2017.
- 9.1.2. Policy Implementation:** Overseeing the implementation and regular review of the AML policy, ensuring it is robust, effective, and up to date.
- 9.1.3. Risk Management:** Conducting regular risk assessments to identify, assess, and manage AML risks specific to the charity's activities and operations.
- 9.1.4. Due Diligence:** Ensuring thorough due diligence checks are carried out on donors, beneficiaries, and partners and monitoring the end use of funds.
- 9.1.5. Training and Awareness:** Promoting AML awareness and understanding amongst the board, staff and volunteers, ensuring regular training sessions are conducted.
- 9.1.6. Reporting and Accountability:** Establishing clear reporting structures for suspicious activities and ensuring proper accountability mechanisms are in place.

9.2. The Money Laundering Reporting Officer

The designated Money Laundering Reporting Officer (Chief Operating Officer) for Time to Help (UK) holds a crucial position in the AML framework.

Responsibilities of the MLRO include:

- 9.2.1. Reporting and Liaison:** Acting as the primary point of contact for all money laundering-related issues and liaising with law enforcement and regulatory bodies as required.
- 9.2.2. Suspicious Activity Oversight:** Receiving and reviewing reports of suspicious activities from within the charity and deciding on the appropriate action, including filing Suspicious Activity Reports (SARs) with the National Crime Agency (NCA) when necessary.
- 9.2.3. Record Keeping:** Maintaining detailed and confidential records of all AML activities, including due diligence checks, training records, and reports of suspicious activities.
- 9.2.4. Policy Guidance and Implementation:** Guiding the implementation of AML policies and procedures across the charity, ensuring they are understood and followed by all.
- 9.2.5. Training and Support:** Providing ongoing training and support to staff and volunteers on AML matters, ensuring a high level of vigilance and compliance.

9.2.6. Regular Updates and Reviews: Keeping abreast of changes in AML legislation and best practices and updating the charity's AML policies and procedures accordingly.

9.3. Contact Details of Time to Help (UK) MLRO:

COO: 0203239 1111, y.kar@timetohelp.org.uk

10. Know Your Donors

Time to Help adopts a rigorous "Know Your Donor" (KYD) principle as a critical component of its Anti-Money Laundering (AML) policy. This principle is designed to ensure that all donations received are from legitimate sources and are not used to launder money. The key aspects of the KYD principle include:

- 10.1. Donor Identification:** All donors, particularly those making significant contributions, must be identified. This process involves collecting basic information such as name, address, occupation, and the source of funds.
- 10.2. Verification of Donor Identity:** For sizable donations, additional verification steps are taken. This may include checking identification documents, cross-referencing against public databases, or conducting background checks, especially for donors from or residing in high-risk countries.
- 10.3. Understanding the Donor's Motivation:** Understanding why a donor is interested in supporting Time to Help (UK) is crucial. This involves direct communication to understand their motivation and ensure it aligns with our charity's values and objectives. Time to Help (UK) will carefully analyse large one-time donations or a series of small donations by requesting an explanation from the donors surrounding their motivations or agenda.
- 10.4. Monitoring Donor Behaviour:** Regularly monitoring donation patterns for any unusual activity. Significant changes in donation amounts, frequency, or method may warrant further investigation.
- 10.5. Donor Confidentiality:** Respecting donor privacy while balancing the need for transparency and compliance with AML regulations. Sensitive donor information is handled with the utmost confidentiality and in compliance with data protection laws.
- 10.6. Enhanced Due Diligence for High-Risk Donors:** Enhanced due diligence will be carried out for donors from high-risk countries, politically exposed persons, or those with links to risky sectors. This might involve deeper background checks and closer monitoring of their donations.
- 10.7. Refusal of Donations:** Time to Help (UK) reserves the right to refuse donations if they fail to pass our KYD checks or if accepting the donation could potentially harm the reputation of the charity.

- 10.8. Record Keeping:** Maintaining comprehensive records of all donor checks and related communications. These records are kept securely and in compliance with applicable data protection regulations.
- 10.9. Regular Training and Awareness:** Ensuring that all staff and volunteers involved in fundraising and donor relations are trained on the KYD principle and its importance in preventing money laundering.
- 10.10. Audit and Review:** Periodically auditing the KYD process to ensure its effectiveness and compliance with the latest AML laws and best practices.

11. Donations From Individuals

To minimise the risks associated with donations from individuals, Time to Help (UK) will implement the following steps:

- 11.1. Donor Identification and Verification:** We will collect and verify the identity of individual donors, especially for significant contributions, obtaining full names, addresses, and other relevant personal information.
- 11.2. Assess Donation Source:** We will inquire about the source of the funds for large or unusual donations to ensure they are not derived from illicit activities.
- 11.3. Monitor Donation Patterns:** Regular reviews of donation patterns will be conducted to detect any irregular or suspicious activities, such as sudden large donations or structured small donations.
- 11.4. Enhanced Due Diligence for High-Risk Donors:** Enhanced due diligence will be carried out for donors from high-risk countries, politically exposed persons, or those with links to risky sectors.
- 11.5. Record Keeping:** We will maintain detailed records of all donations and donor verifications for at least six years from the end of the financial year in which they were made (as required by the Charities Act 2011).
- 11.6. Refuse Suspicious Donations:** We will be prepared to refuse or return donations if the donor fails AML checks or if the source of funds cannot be verified as legitimate.

12. Donations From Institutions, Companies or Government

To minimise the risks associated with donations from institutions, companies or government, Time to Help (UK) will implement the following steps:

- 12.1. Corporate Due Diligence:** We will verify the legitimacy of the donating institution, company, or government body, checking their registration, ownership structure, and reputation.
- 12.2. Understand the Nature of the Donation:** We will clarify the purpose of the donation and any conditions attached, ensuring alignment with our objectives and independence.

- 12.3. Review Financial Standing:** The financial standing and history of the donating body will be investigated— looking for any red flags, such as involvement in financial misconduct.
- 12.4. Political and Sanctions Checks:** For donations from government bodies or politically exposed persons, checks against political exposure and international sanctions lists will be conducted.
- 12.5. Agreements and Documentation:** All donations will be accompanied by clear agreements or documentation outlining the terms and conditions.
- 12.6. Monitoring and Reporting:** Ongoing relationships with institutional donors will be monitored, and any suspicious activities will be reported in line with AML regulations.
- 12.7. Third-Party Verification:** Independent third-party sources will be used, where possible, to verify the legitimacy and reputation of the donor organisation.

13. Know Your Beneficiaries

In our commitment to maintaining integrity and transparency, Time to Help (UK) will implement a stringent beneficiary vetting process as part of our Anti-Money Laundering (AML) policy. The following principles will guide this process:

- 13.1. Independent Vetting:** We will independently vet all beneficiaries to ensure aid is directed appropriately and in line with our ethical standards.
- 13.2. No Donor Influence:** To safeguard against potential conflicts of interest and ensure impartiality, no donor will have the authority to intervene in or request specific allocation of aid to any individual beneficiary.

This focused approach ensures that all aid distribution by Time to Help (UK) is conducted fairly, ethically, and without undue external influence, aligning with our core values and AML commitments.

14. Know Your Partners

We will always collect and verify Partner Information before conducting any business with them. Time to Help (UK) will gather key information about potential partners, including organisational details and operational history, and verify this information for accuracy and relevance. We will:

- 14.1. Verify Partner Identity:** We will confirm the identity of our partners through official documentation, such as registration certificates and legal documents, to ensure their legitimacy.
- 14.2. Verify Partner's Reputation:** Assessing the reputation of partners will involve reviewing public information, references, and previous collaborations to ensure they meet our ethical standards.

- 14.3. Verify Partner's Relationship to Time to Help (UK):** The relationship with each partner will be evaluated to ensure alignment with our mission and values, including their understanding of and commitment to our objectives.
- 14.4. Monitor Partner Activity:** Regular monitoring of partner activities will include reviewing reports and financial statements, as well as conducting meetings, to ensure alignment with our objectives and AML compliance.
- 14.5. On-boarding Process:** A structured onboarding process for new partners will include briefings on our AML policy and compliance expectations.
- 14.6. Due Diligence:** Comprehensive due diligence using the Charity Commission's Tools 8, 9, and 10 will assess the partner's financial practices, governance, and operational integrity.
- 14.7. Sanctions and International Lists Check:** We will check partners, their senior staff, and directors against UK, EU, and USA consolidated sanction lists and other relevant international lists. This will ensure they have no associations with illegal activities or entities known for money laundering.
- 14.8. Check for Red Flags:** Vigilance for red flags, such as unusual financial changes or secrecy in operations, will be maintained (with any concerns thoroughly investigated).
- 14.9. Report:** Any irregularities identified will be reported internally and, where necessary, to external authorities in line with our AML policy.

15. Key Financial Risks for Time to Help (UK)

15.1. Fraud and Theft

Risk: Misappropriation of funds, theft of assets, or fraudulent activities by staff, volunteers, or external parties.

Management: Implementation of strong internal controls, regular audits, and fostering a culture of transparency and accountability.

15.2. Money Laundering

Risk: The use of Time to Help's operations to launder money from criminal activities.

Management: Conducting thorough due diligence on donors and partners, monitoring transaction patterns, and adhering to "Know Your Donor/Partner/Beneficiary" principles.

15.3. Bribery and Corruption

Risk: Involvement in bribery or corrupt practices, which could occur in dealings with external entities or internally.

Management: Establishing a clear anti-bribery policy, training staff and volunteers on identifying and avoiding corrupt practices and maintaining a zero-tolerance stance.

15.4. Terrorist Financing

Risk: Unwittingly providing financial support to individuals or groups involved in terrorism.

Management: Ensuring all funding and donations are scrutinised for potential links to terrorism, using tools and resources to screen against global watchlists.

15.5. Sanctioned Individuals, Organisations, and Countries

Risk: Engaging in transactions with individuals, organisations, or countries subject to international sanctions.

Management: Regularly checking global sanction lists, conducting rigorous background checks, and ensuring compliance with international trade and sanction laws.

By addressing these key financial risks, Time to Help (UK) strengthens its financial integrity and ensures compliance with legal and ethical standards.

16. Financing Overseas

Time to Help (UK) recognises the complexities and risks associated with financing overseas operations. To manage these risks effectively, the following extra steps will be incorporated into our approach:

- 16.1. Use of the Banking System:** All financial transfers for overseas operations will be conducted through the formal banking system. This ensures traceability and security of funds.
- 16.2. Clear Transaction Descriptions:** Every transfer will be accompanied by a clear description of the purpose of the funds. This includes detailed information about the activities being financed and the rationale behind the financial support.
- 16.3. Source and Destination Transparency:** We will provide complete information to our banking partners about the origins and destinations of the funds. This transparency is crucial for compliance with global financial regulations.
- 16.4. Understanding Local Banking Systems:** Prior to engaging in financial activities in any country, we will conduct a thorough assessment of the local banking system. This includes understanding its reliability, regulatory framework, and any potential risks associated with operating within that system.
- 16.5. Political and Social Context Awareness:** Time to Help (UK) will maintain an up-to-date understanding of the political and social landscapes of the countries in which we operate. This includes monitoring for any changes that could impact the risk profile of operating in those regions.
- 16.6. Risk Assessment and Comfort Level:** We will continuously evaluate the risks associated with operating in each country. Decisions to proceed with or halt

operations will be based on a comprehensive assessment of these risks and our comfort level in managing them.

- 16.7. Ongoing Monitoring and Review:** The overseas financing strategies will be subject to ongoing monitoring and regular reviews to adapt to any changes in the political, social, or economic environments of the countries we work in.

17. Procedures And Due Diligence

"Procedures and Due Diligence" is a crucial section of our AML policy, ensuring that every step, from donation receipt to end-user support, is conducted with integrity and compliance. This section outlines our comprehensive approach.

Our AML Procedure:

17.1. Donation Receipt

17.1.1. Identification and Verification: Upon receiving a donation, we will identify and verify the donor's identity, particularly for significant contributions, using a combination of documentation checks and, where necessary, background inquiries.

17.1.2. Source of Funds: We will ascertain the source of the funds to ensure they are derived from legitimate activities.

17.2. Fund Allocation

17.2.1. Internal Review: Each donation will undergo an internal review to allocate the funds appropriately based on current needs and organisational priorities.

17.2.2. Compliance Checks: This includes ensuring that the allocation of funds complies with legal requirements and our ethical standards.

17.3. Partner and Beneficiary Selection

17.3.1. Vetting Partners: We will conduct due diligence on all partners involved in the distribution of funds, using tools from the Charity Commission and additional checks against sanction lists.

17.3.2. Beneficiary Verification: Beneficiaries of the funds will be vetted to ensure they are legitimate recipients and align with our mission. This involves identity checks and understanding their situation.

17.4. Fund Distribution

17.4.1. Secure Transfer: Funds will be transferred securely, primarily through banking channels, with all necessary descriptions and compliance information.

17.4.2. Monitoring and Reporting: The transfer and utilisation of funds will be monitored. Any discrepancies or suspicious activities will be reported immediately.

17.5. End-User Support

17.5.1. Impact Assessment: We will assess the impact of the support provided, ensuring it meets the intended goals and benefits the right individuals or communities.

17.5.2. Feedback and Review: Gathering feedback from end-users and partners will be an essential part of our process, providing insights for future improvements.

17.6. Regular Policy Review

Trustee Meetings: These policies and procedures will be regularly discussed and reviewed at trustee meetings to ensure they remain effective and compliant with evolving AML regulations.

18. Reporting Suspicious Activities

18.1. What Warning Signs Should Staff Be Alert To?

At Time to Help (UK), staff and volunteers are trained to be alert to various indicators of suspicious activities, including:

18.1.1. Unusual Donation Patterns: Sudden large donations or repeated donations from unknown sources, especially if the donor insists on anonymity without a valid reason.

18.1.2. Complex Financial Transactions: Transactions that are overly complex and do not seem to have a clear charitable purpose.

18.1.3. Geographic Risks: Transactions connected to countries known for high levels of corruption or money laundering.

18.1.4. Inconsistent Information: Discrepancies in the information provided by donors, partners, or beneficiaries.

18.1.5. Evasive Behaviour: Individuals or organisations that are evasive or unwilling to provide necessary information for due diligence.

18.2. Reporting To The National Crime Agency And Charity Commission:

In the event of identifying suspicious activities, the following reporting procedures will be followed:

18.2.1. Internal Reporting: Any suspicions of money laundering or terrorist financing must be reported immediately to Time to Help's designated Money Laundering Reporting Officer (MLRO).

- 18.2.2. MLRO Assessment:** The MLRO will assess the report and determine if there is reasonable suspicion of money laundering or terrorist financing activities.
- 18.2.3. External Reporting:** If the MLRO concludes that the concerns are valid, they will file a Suspicious Activity Report (SAR) with the National Crime Agency (NCA).
- 18.2.4. Reporting to Charity Commission:** Where appropriate, especially in cases of significant financial loss or potential reputational damage, the incident will also be reported to the Charity Commission.
- 18.2.5. Confidential Record Keeping:** All reports, investigations, and subsequent actions will be documented and securely stored, maintaining confidentiality in line with data protection laws.

19. Record Keeping

In line with Charity Commission guidelines and best practices, Time to Help (UK) will adhere to the following record-keeping procedures:

- 19.1. Documentation of Transactions:** All financial transactions, including donations received and funds disbursed, will be accurately recorded and maintained.
- 19.2. Donor and Beneficiary Records:** Detailed records of all donor and beneficiary vetting processes will be kept, including identity verifications and due diligence checks.
- 19.3. Reports and Investigations:** Records of all reports related to suspicious activities and subsequent investigations will be securely maintained.
- 19.4. Retention Policy:** All records will be kept for a minimum period as required by law, ensuring compliance with AML regulations and facilitating any potential audits or investigations.

20. Training and Awareness

Time to Help (UK) recognises the importance of ongoing training and awareness in ensuring effective AML compliance:

- 20.1. Regular Training Sessions:** Staff and volunteers will receive regular training on AML policies, procedures, and the latest regulations.
- 20.2. Awareness Programs:** Awareness programs will be conducted to educate all members of the organisation about the risks of money laundering and their role in preventing it.
- 20.3. Updates on Changes in Law:** Any changes in AML-related laws or regulations will be promptly communicated to ensure up-to-date knowledge and compliance.

21. Review and Update of Policy

To ensure the AML policy remains effective and current, Time to Help (UK) will implement a regular review and update process:

- 21.1. Periodic Policy Reviews:** The AML policy will be reviewed periodically (every financial year) to assess its effectiveness and to make necessary adjustments in response to changing regulatory environments or operational changes within the charity.
 - 21.2. Incorporating Feedback:** Feedback from staff, volunteers, partners, and beneficiaries will be considered during policy reviews to enhance its applicability and effectiveness.
 - 21.3. Trustee Oversight:** Updates and revisions to the policy will be overseen by the trustees, ensuring alignment with both Charity Commission guidelines and the evolving needs of the organisation.
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Version	Date	Approved by	Notes
1.0	09/2023	The Board	(First Draft)
2.0	06/2024	The Board	
2.1	07/2025	Trustees	YK
2.2	07/2025		Amendments

End of Policy

