



Wolfson College Cambridge

WOLFSON COLLEGE CAMBRIDGE

ANTI-MONEY LAUNDERING POLICY

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Wolfson College: Anti-money laundering policy statement

The College is committed to ensuring the highest standards of integrity in all of its financial dealings. It will therefore ensure that it has in place robust financial controls so that it can protect its funds and ensure continuing public trust and confidence in it. The College could potentially be used as a vehicle through which criminals seek to launder the proceeds of crime (**PoC**). Additionally, the College, or a member of staff, is at risk of committing a money laundering offence if they accept PoC in circumstances where they have knowledge or a reasonable suspicion that payment is from PoC.

Members of staff need to be vigilant to the risk of accepting PoC and play their role in assisting law enforcement agencies in combatting money laundering. The Proceeds of Crime Act 2002 (POCA) (as amended from time to time) imposes obligations on the College and its staff in respect of money laundering and associated activities.

Purpose

The purpose of this policy is to

- assist staff with identifying red flags that may be indicative of money laundering activities;
- reduce the risk of the College being used as a vehicle through which criminals can launder PoC; and
- let staff know what they should do if they have a concern that the College is at risk of accepting PoC.

Failure to comply with this policy can lead to disciplinary action.

What is money laundering?

Money laundering is the practice of cleaning up money that has, for some reason, been obtained illegally. Often there is a complex trail involved so that the practice cannot be easily identified or traced.

The term “money laundering” covers several offences each of which relate to the improper handling of PoC so that they appear to come from a legitimate source. Money laundering underpins most forms of organised crime and is often linked with the financing of terrorism. However, it can also benefit individuals engaging in bribery and dishonest activities such as receiving stolen goods or tax evasion.

Key areas of risk for the College

Money laundering can take many forms, but in relation to the College, it could involve, but will not be limited to:

- Cash payments
- The payment of fees
- The payment of fees from third parties
- The donation of sums to fund-raising campaigns
- The donation of sums for no obvious reason
- The payment in advance of fees; and
- The requested return of donation or fees paid in advance.

A non-exhaustive list of warning signs or “red flags” that a payment might be part of a money-laundering scheme is set out in Appendix 1.

Procedures

1. Cash payments

Although there is no guarantee that payments made through a bank transfer are not PoC, the risk to the College is increased where the College accepts payments in cash. Accordingly, it should be the exception that cash payments of more than £100 are accepted.

In exceptional cases, the College may allow a larger payment to be made in cash. Before agreeing to accept a large cash payment the Finance Manager will consider the circumstances relating to the payment and make further enquiries. Such enquiries might include asking for an explanation of why the payment is being made in cash, information on how the cash was obtained and proof of this. Where a satisfactory explanation is not provided, the College must not accept the cash payment. The Finance Manager must retain a record of the decision made and, in circumstances where there is a suspicion that the payment is derived from PoC, the College should consider whether to make a suspicious activity report to the National Crime Agency and report the matter to the Charity Commission.

2. Donations

Donations are a particular area of potential risk, both in terms of money laundering and for the College's reputation. To mitigate the risk, the College should know where the money it is being given comes from and should be able to identify and be assured of the provenance of substantial donations. A good, open and transparent relationship between the College and its donors is essential for building trust and confidence. The College has a policy governing due diligence on donors and the receipt of donations [*provide link*].

3. Requests for repayments

The College's policy is that any refunds or repayments of sums paid to the College can only be remitted to the bank account from which the payment was made. If a request is made for a refund to be made to a different account, in particular one that belongs to someone other than the original payer, the request must be referred to the Finance Manager promptly.

4. Nominated Officer

The following functions under this policy are to be undertaken by a Nominated Officer. For the purposes of this policy, the Nominated Officer is the Bursar and, in their absence, the Finance Manager:

- The Nominated Officer will be responsible for carrying out the charity's anti-money laundering procedures.
- The Nominated Officer acts as the money laundering reporting officer to receive disclosures from anyone involved in the College of any suspected money laundering activities.
- In respect of disclosures received, the Nominated Officer must retain a record of the decision made and, in circumstances where there is a suspicion that the payment is derived from PoC, the College should consider whether to make a suspicious activity report to the National Crime Agency and report the matter to the Charity Commission.

- The Nominated Officer will ensure that proper records are maintained on all the relevant activities and steps taken to deal with them.

5. Disclosure

If anyone knows, suspects or has reasonable grounds for thinking or suspecting that a person is engaged in money laundering, they must report such matters to the Nominated Officer immediately. Disclosure should be made on a standard form available from the Nominated Officer as set out in Appendix 2.

6. Training

On joining the College any staff whose duties will include undertaking a finance function will receive anti-money laundering training as part of their induction process. All staff undertaking a finance function will receive annual refresher anti-money laundering training. Such training will include the applicable law, the operation of this policy and the circumstances in which suspicions might arise.

The College will make and retain for at least five years records of its anti-money laundering training.

If any member of staff has concerns or would like further information on what they should do in the event of a concern about money laundering, the member of staff should contact the Bursar or the Finance Manager immediately.

Appendix 1

WARNING SIGNS OR RED FLAGS

Payments or prospective payments made to or asked of the College can generate a suspicion of money laundering for a number of different reasons.

For example:

- large cash payments.
- multiple small cash payments to meet a single payment obligation.
- payments or prospective payments from third parties, particularly where:
 - o there is no logical connection between the third party and the student, or
 - o where the third party is not otherwise known to the College, or
 - o where a debt to the College is settled by various third parties making a string of small payments.
- payments from third parties who are foreign public officials or who are politically exposed persons (“PEP”).
- payments made in an unusual or complex way.
- unsolicited offers of short-term loans of large amounts, repayable by cheque or bank transfer, perhaps in a different currency and typically on the basis that the University is allowed to retain interest or otherwise retain a small sum.
- donations which are conditional on particular individuals or organisations, who are unfamiliar to the College, being engaged to carry out work.
- requests for refunds of advance payments, particularly where the College is asked to make the refund payment to someone other than the original payer.
- a series of small payments made from various credit cards with no apparent connection to the student and sometimes followed by chargeback demands.
- the prospective payer wants to pay up-front a larger sum than is required or otherwise wants to make payment in advance of them being due.
- prospective payers are obstructive, evasive or secretive when asked about their identity or the source of their funds or wealth.
- prospective payments from a potentially risky source or a high-risk jurisdiction.
- the payer’s ability to finance the payments required is not immediately apparent or the funding arrangements are otherwise unusual.

Appendix 2

CONFIDENTIAL - Suspected Money Laundering Reporting Form <i>Please complete and send this (in a physical format) to the Nominated Officer</i>	
From:	Department:
Contact Details :	
DETAILS OF SUSPECTED OFFENCE [Please continue on a separate sheet if necessary]	
Name(s) and address(es) of person(s) involved, including relationship with the College:	
Nature, value and timing of activity involved:	
Nature of suspicions regarding such activity:	
Details of any enquiries you may have undertaken to date:	
Have you discussed your suspicions with anyone? And if so, on what basis?	
Is any aspect of the transaction(s) outstanding and requiring consent to progress?	
Any other relevant information that may be useful?	
Signed:	Date:
Nominated Officer contact details: Contact name: Joanna Cheffins Job title: Bursar Address: Wolfson College, Barton Road, Cambridge, CB3 9BB Phone number: 01223 335939	
<i>Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. To do so may constitute a tipping off offence.</i>	