Beverley Baptist Church
www.beverleybaptist.com

Anti money-laundering, terrorist financing and bribery Policy

This policy has been adapted from the template within the Stewardship *Anti money-laundering, terrorist financing and bribery policy and guidance notes.*

1. General policy

1.1 The Leadership Team (charity trustees) of Beverley Baptist acknowledge the need to have policies and procedures in place to combat money laundering, terrorist financing and bribery which meet the requirements set out in the Terrorism Act 2000, Proceeds of Crime Act 2002, Bribery Act 2010, Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

1.2 Our policy is to operate financial controls and, on a risk rated basis, to carry out other checks, sufficient to ensure that, as far as possible:

- The church has reasonable knowledge and understanding of those providing funds to it and that those funds come from legitimate sources
- Grants or other payments of money made by the church are transferred securely so as to reach the intended recipient
- The church has reasonable knowledge and understanding of the character, nature, and work undertaken by the recipient organisation or individuals
- Grants provided by the church have been used as directed and have not been diverted for use by terrorist organisations
- Grants and other payments made by the church have not been used as bribes.

1.3 The Leadership Team (charity trustees) have provided sufficient training to ensure that staff and volunteers are aware of their responsibilities and are able to properly discharge them.

1.5 In constructing this policy the Leadership Team (charity trustees) have paid due regard to the guidance provided by the Charity Commission. Leadership Team (charity trustees) are recommended to read the whole of the Charity Committee's guidance in this area.

1.6 The overall responsibility for this policy and its implementation rests with the Leadership Team (charity trustees) of Beverley Baptist.

2. Donors and inflows

2.1 Using a risk rated approach, the church takes reasonable steps to identify donors that provide unusual gifts; or donors that provide 'one-off' gifts or accumulated gifts in any one year that exceed £10,000.

2.2 Where relationships are strong and long-standing, these checks will be largely informal unless there are circumstances identified that cause sufficient concern to warrant more formal checks. More formal checks will be required for new and developing relationships.

2.3 Some examples of circumstances that may give rise to a level of concern include:

- One-off donations that exceed £10,000 received from individuals previously unknown to the church
- Donations that carry restrictions that require the funds to flow through the church to external parties, particularly where these parties are located in areas that are more susceptible to corruption or which are known to be close to terrorist hot-spots
- Donations in excess of £1,000 that are received in cash
- Donations received that are 'out of character' with previously established patterns of giving
- Donations where perceived amount of tax paid might not me commensurate with the level of Gift Aid being claimed
- Out of the ordinary, large anonymous donations.

2.4 Where formal checks are implemented these are intended to:

- Identify the donor
- Identify the source of funds from which the donation originated.

2.5 In cases where suspicions of money laundering or terrorist financing are identified, these should be reported in accordance with the procedures set out in section 4 of this policy.

3. Grants and outflows

3.1 Beverley Baptist implements financial controls sufficient to ensure that grants and other outflows of funds reach their intended recipients. Specifically this means that:

- Grants and financial support can be made by transfer of funds from the church's bank accounts directly to the bank account of the recipient, or preferably via the UK-registered charity to which they are associated
- Where the recipient is an organisation, the bank account of the recipient will be in the name of that organisation rather than an individual. Where the bank account is not in the name of the organisation, proper enquiries should be made to confirm that the trustees of the recipient organisation:
    - have authorised the use of that account, and
    - have in place robust mechanisms for ensuring that all the funds paid into the account are received by the ultimate recipient with deductions that are no more than reasonable in the circumstances to cover the administrative cost of handling the onward transmission
- Where transfers can't be made, cheques will be used, made payable to an organisation rather than an individual, unless following procedures as above
- Grants and other transfers will only be made in cash of any currency in extreme or unusual circumstances and only with the knowledge and consent of the Leadership Team (charity trustees).

3.2 Using a risk rated approach, the church takes reasonable steps to identify and understand the nature of the work carried out by all recipients. The church adopts a more formal approach for individual recipients or recipient organisations:

- Where relationships are less well developed
- That operate in regions of the world where regulation is less well developed and are known to be more susceptible to corruption
- That operate in conflict zones or known terrorist hotspots
- Where recipients fall under the definition provided by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 of politically exposed persons (PEP)
- Where the governing structure of the recipient has recently changed
- Where the emphasis of the work undertaken by the recipient has recently changed.

3.3 Formal identification of recipients may include:

- The use of independent and reliable source material including:
    - Documents issued by, or evidence obtained from government departments
    - Documents issued by, or evidence obtained from registering authorities or agencies
    - Photographic identification, where the image can be compared to the likeness of recipient in person
    - Database services such as those provided by Experian and similar organisations.
- Other research including:
    - Personal commendation
    - Internet research
    - Face-to-face visits
    - Third party due diligence.

3.4 In cases where suspicions of money laundering or terrorist financing are identified, these should be reported in accordance with the procedures set out in section 4 of this policy.

3.5 The church will take reasonable steps to ensure the recipient of the grant understands the intended purpose of the grant and the limits of the use of the funds. This will include making it clear that none of the funds granted will be used for actions which fund terrorism or bribery.

3.6 Using a risk rated approach, the church will take reasonable steps to ensure that the grant provided has been used in the way that was intended and that it has not been diverted towards terrorist organisations or for terrorist activities. Such reassurance may take the form of:

- Confirmation from a senior member of the recipient organisation that the grant has been used as intended
- Receipts evidencing that grants have been used as expected
- A written analysis of where the funds have been spent
- Other means of research including, but not limited to, annual communications with the recipient, and visits from them whilst in the UK, and unhindered discussion regarding the work they are involved in and how any donations have assisted that work.

3.7 Beverley Baptist has a zero-tolerance policy to bribery. Where the church identifies or has reasonable suspicion that grants have been used for the purposes of bribery it will with immediate effect stop sending further grants, until suitable assurances can be provided that further grants will not be used for bribery.

4. Reporting suspicions

4.1 Any volunteer or member of staff that has become aware or has reasonable suspicions of transactions that might constitute money laundering or terrorist financing or believes that grants have been used as bribes should report these to one of the Leadership Team (charity trustees).

A criminal offence may be committed where a person makes an unlawful disclosure which is likely to prejudice a money laundering investigation. For this reason reasonable suspicions should not be discussed with persons that do not need to know. In most cases, this will mean disclosure should be limited to reporting to the Charity Treasurer.

4.3 In cases where the trustees are satisfied that the transactions do constitute money laundering or terrorist financing or that the suspicions are well founded, a 'suspicious activity report' (SAR) will be made to the National Crime Agency (NCA), or subsequent equivalent organistion.

4.4 Whilst it is recognised that the church is not operating in the regulated sector, it may have an obligation to submit a SAR. The trustees may commit an offence if they have 'knowledge' or 'suspicion' of money laundering activity or criminal property, do something to assist another in dealing with it, and fail to make a SAR. As a consequence, where no SAR is planned, although it is considered that there is a risk that a SAR may be required, the Leadership Team (charity trustees) will take appropriate legal advice to be provided in writing.

5. Staff training

5.1 The Leadership Team (charity trustees) will provide suitable and relevant training to its staff and volunteers that may be impacted by these issues to ensure that they understand this policy and are made aware of changes and developments in the law that impact onto their responsibilities.

6. Adoption of this policy

6.1 The Leadership Team (charity trustees) of Beverley Baptist formally accepted this policy at the Leadership Team (charity trustees) meeting held on 2nd July 2026.