

Anti-Terrorism, Anti-Fraud, and Safeguarding Against Misuse of Funds Policy

Policy Purpose

The Sponsorship Toolkit is dedicated to maintaining the integrity of our funds and resources, ensuring they are not misused for terrorist activities or subjected to fraud. This policy outlines our commitment to prevent misuse and corruption when providing support to partners and third parties.

Policy Scope

This policy applies to all programmes, initiatives and products belonging to The Sponsorship Toolkit. It encompasses all members of The Sponsorship Toolkit, including employees, board members, volunteers, contractors, and consultants. Partner organizations involved in our initiatives are also subject to this policy.

Policy Principles

- We are committed to upholding United Kingdom laws related to anti-terrorism financing, money laundering, and funds misuse.
- We promote best practices to prevent funds misuse and corruption.
- We integrate this policy within our organisational culture and ensure awareness among our personnel.
- We assess the risk of terrorism financing and implement appropriate precautions.
- We strive to understand and mitigate potential risks related to terrorism financing or money laundering.

Implementation of the Policy

a) Due Diligence for Partners

- Each Partner will be evaluated for terrorism financing risk.
- We will conduct due diligence on prospective Partners, including identity confirmation and screening against relevant lists.
- Ongoing project visits and reviews will be conducted by our staff.

b) Anti-Terrorism Practices for Partners

- Partners must comply with the anti-terrorism financing laws of their operating countries.
- We require Partners to have policies aligned with our principles. If lacking or insufficient, they must adopt our policy.

c) Payments and Fund Transfers

- All grant payments will be channelled through regulated financial institutions to approved beneficiaries.
- Detailed records of fund transfers will be maintained.

d) Monitoring and Reporting

- We will monitor partner activities to ensure funds are used appropriately.
- Additional precautions will be taken for Partners assessed as high risk.
- Any suspicious activity will be promptly reported to our Directors.

Policy History Initial policy adopted by The Sponsorship Toolkit on [Insert Date].

By adhering to this policy, The Sponsorship Toolkit remains committed to ethical conduct and safeguarding our resources against misuse, thereby contributing to a safer and more secure environment for our initiatives and partners.

Last updated: 15 August 2023