

CCA Financial Sanctions, Anti-Terrorism and Anti-Money Laundering Policy

CCA is committed to ensuring its resources are used solely to further its charitable aims and objectives.

Therefore, CCA will take all reasonable steps to ensure that:

- None of its funds or property are made available to parties that are subject to financial sanctions or are otherwise proscribed by the United Nations or World Bank, or by the governments of the United Kingdom, European Union, or United States.
- None of its funds or property are used for purposes of terrorism
- It is not connected with money laundering

To this end, CCA will:

- be confident regarding the sources of its funds
- select and screen recipients of funds:
- ensure Trustees and, where appropriate, partners are trained and supported, to be aware of risks;
- report any suspected breaches of legislation and sanctions to the appropriate bodies;

All Trustees shall immediately report to the Chair, or if the Chair is the Trustee in question, the Hon Secretary, any belief or suspicion that CCA funds or property have been or might have been or are intended to be used by any sanctioned or proscribed party, or by any party for the purposes of terrorism. The report will then be assessed and responded to, including notifications to all relevant authorities and donors.

Who must follow this policy: All Trustees must follow this policy which applies in all geographic areas where CCA or its partners operate.

Keywords and Definitions

Financial sanctions: Financial sanctions are imposed by the United Nations, European Union, United Kingdom, United States, and other countries. They take different forms including:

- asset freezes which restrict access to funds and economic resources
- restrictions on various financial markets and activities in certain countries
- directions to cease business of a specified type
- directions to cease all business with certain sanctioned individuals or organisations.

Money Laundering: is the process of making illegally-gained proceeds (i.e., "dirty money") appear legal (i.e., "clean").

Charities can be targets for money laundering, if criminals believe they can put money into the charity and get it back out again. This could be through refunds, loan repayments, or payments to an organisation or people the criminal controls.

Terrorism: an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or an international governmental organisation, or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.