Anti-Money Laundering (AML) Policy

1. **Policy Statement**
   Red Trouser Day is committed to upholding the highest standards of integrity and transparency. As a registered charity, we take seriously our duty to prevent the misuse of charitable funds for criminal or unethical purposes. We do not tolerate fraud, corruption, bribery, or abuse of position, and we fully comply with the Proceeds of Crime Act 2002, the Terrorism Act 2000, the Bribery Act 2010, the Money Laundering Regulations 2007, and all relevant amendments.

2. **Purpose**
   This policy is designed to ensure Red Trouser Day complies with legal obligations to prevent money laundering and the funding of criminal or terrorist activity. It aims to safeguard the charity's reputation and ensure that all charitable funds are used for legitimate and ethical purposes.

Scope

3. This policy applies to all individuals associated with Red Trouser Day, including:
   - Trustees
   - Volunteers
   - Contractors or consultants
   - Donors
   - Partners and suppliers
   - Anyone representing or working on behalf of the charity

   We expect everyone to remain vigilant and report any suspicions of improper financial activity.

4. **What is Money Laundering?**
   Money laundering is the process of concealing the origins of money obtained through criminal means. This can involve seemingly legitimate donations or partnerships used to hide illegal activity. Even if done unknowingly, being involved in money laundering carries serious legal and reputational risks.

5. **Roles and Responsibilities**
   The Treasurer will act as Red Trouser Day's Money Laundering Reporting Officer (MLRO). In their absence, another trustee may be appointed to this role temporarily.

   The MLRO is responsible for:
   - Receiving and assessing reports of suspicious activity
   - Keeping appropriate records of all concerns or investigations
   - Reporting to the National Crime Agency (NCA) if required

6. **Due Diligence**

Before accepting large or unusual donations or engaging in financial relationships, the charity may:

- Verify the identity of donors or organisations
- Request the source and intended use of funds
- Maintain clear records of due diligence and decisions made

While we respect donor privacy, we must ensure donations do not compromise legal or ethical standards.

7. Raising Concerns

If you suspect or become aware of:

- A suspicious donation
- Unusual financial behaviour
- A person or organisation attempting to use the charity for criminal purposes

You must report it to the MLRO immediately using the appropriate disclosure form. This includes: Details of those involved

- Date and nature of the transaction
- Reasons for suspicion

All reports are handled confidentially and in line with our duty of care.

8. Record-Keeping

The MLRO will maintain detailed records of all disclosures, investigations, and decisions for at least five years, even if no further action is taken.

9. Training and Awareness

Trustees and key volunteers will be made aware of their responsibilities under this policy. Guidance and updates will be provided as necessary to ensure compliance.

10. Review

This policy will be reviewed annually or sooner if legal requirements change by the Board of Trustees. All approved policy updates will be shared with those affected.

RTD Policy Framework

Policy Area	Lead Policy	Linked Policies
Risk	Risk Management	SIR, ***AML***, Anti Bribery, Safeguarding
People	Safeguarding	SIR, Complaints
Finance	***Anti Money Laundering***	Tainted Donations, Anti Bribery
Conduct	Conflict of Interest	Complaints, SIR , Data Protection, Privacy
Information	Privacy	Acceptable IT Use, Complaints, Social Media, Data

		Protection

SIR – Serious incident Reporting AML – Anti Money Laundering