

Title of Document	Anti-Money Laundering Policy
Name of Department	Finance

What type of document is this?	Policy	This sets out instructions for how a particular procedure in Helping Hands is to be routinely carried out	
Which Helping Hands POL/SOP/W.I does this document relate to?	Anti-Corruption and Bribery Policy Handling Customer's Money Policy Gifts, Wills and Legacies Policy	Reference number of POL/SOP/W.I	HHH-POL-010 HHH-POL-003 HHH-POL-059

Which Operational Priority/Priorities does this document link to?	Governance Framework	Superior Client Care	People, Performance & Culture	Business Growth
	Maximising Efficiency & Cost Management			

Custodian of document	Chief Financial Officer	Committee/Group responsible for this document	Policy Committee
Approval date and committee chairperson signature	28.01.2025	When is its next scheduled review?	28.01.2028

Who does it apply to?	All Helping Hands staff					
	Does it apply to bank workers?	Yes	Does it apply to agency staff?	Yes	Does it apply to third party contractors?	Yes

Purpose of the Policy	<p>The purpose of this policy is to:</p> <ul style="list-style-type: none"> Prevent Helping Hands from being used for money laundering activities. Ensure compliance with legal and regulatory requirements. Protect the reputation of Helping Hands.
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ROLES AND RESPONSIBILITIES

Role	Responsibility
Chief Financial Officer	To hold the role of Money Laundering Reporting Officer (MLRO). Ensure that all areas of the business are aware of the policy requirements and that staff adhere to policy requirements.
Financial Director/Controller	To act as Deputy MLRO in the CFO's absence. To ensure the policy is embedded within the organisation and monitor relevant legislation or regulations with may impact the policy
Directors and Managers	Ensure the policy is implemented and embedded and monitoring any breach of policy
All Employees	To adhere to policy guidelines at all times.

1. Introduction

This policy outlines the procedures and responsibilities for preventing and detecting money laundering activities within Midshires Care Limited t/a Helping Hands **"Helping Hands"**. It ensures compliance with the UK's Money Laundering Regulations 2017, Proceeds of Crime Act 2002 and other relevant legislation.

By definition, 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.

Money laundering can occur in many ways. It may happen by dispersing money through many different bank accounts (to hide its origins), but can occur when the company is used unwittingly as a "trading partner".

This policy should be read in conjunction with the Company's Anti-Corruption and Bribery Policy – HHH-POL-010.

2. The role of the Money Laundering Reporting Officer

It is the responsibility of management to ensure the implementation and regular review of this policy.

The CFO acts as the money laundering reporting officer (MLRO) to receive disclosures from anyone involved in the company of any suspected money laundering activities. The Finance Director/Controller will act as temporary MLRO if the MLRO is not available.

The MLRO will be responsible for carrying out the company's anti-money laundering procedures.

The MLRO will ensure that proper records are maintained on all the relevant activities and steps taken to deal with them. The MLRO will be responsible for Suspicious Activity Report (SAR) are kept and any suspicious activity is reported to the National Crime Agency (NCA).

All employees must be vigilant and report any suspicious activities to the MLRO.

3. Identifying Money Laundering activities

There are many ways in which to spot money laundering or how to decide whether to make a report. Facts which tend to suggest that something 'odd' is happening may be sufficient for a reasonable suspicion of money laundering to arise.

Potentially anyone could be caught by the money laundering provisions if they suspect money laundering and either become involved with it in some way and/or do nothing about it, they may then be liable to prosecution.

4. Requirements of the Money Laundering Legislation

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 impose specific obligations on "relevant persons".

The term relevant person relates to the following activities carried out in the course of business; tax advice; accounting services; treasury management; investment or other financial services; credit institutions; audit services; legal services; estate agents; services involving the formation, operation or arrangement of a company or trust; dealing in goods wherever a transaction involves a cash payment equivalent to €15,000 (£12,000) or more.

Some activities undertaken by companies could be included within the scope of the money laundering regulations. Therefore, to ensure compliance with the regulations and legislation and for the purposes of this Policy Helping hands are considered a relevant person when acting in the course of business and activities carried on by them.

5. Customer Due Diligence (CDD)

Electronic or cheque payments to the Company are easily traceable through the banking system. As traceability is key and an individual walking in to pay a debt with cash is not necessarily traceable, it is best practice to insist on payment electronically from a UK Clearing Bank.

We will not permit customers to pay their invoices using cash to ensure we meet all money laundering requirements.

6. Reporting Suspicious Activities

If anyone knows, suspects or has reasonable grounds for thinking or suspecting that a person is engaged in money laundering or terrorist financing, they must report such matters to the MLRO immediately.

The MLRO will consider the report and any other information available.

Once the MLRO has evaluated the disclosure or other information, they will determine if:

- a. There are reasonable grounds for suspecting money laundering and the steps to be taken; or
- b. There is actual money laundering or terrorist financing; and
- c. Whether they need to report the matter to the National Crime Agency (NCA).

All disclosure reports referred to by the MLRO and reports made by them to the NCA will be retained for a minimum of 5 years.

7. Record Keeping

We will:

- Maintain records of all CDD information, transactions, and reports for at least five years.
- Ensure records are secure and accessible only to authorised employees.

TRAINING

Is training required?	Yes – for relevant employees
Details of training	We will provide regular Anti-Money Laundering training to all relevant employees to ensure they understand their responsibilities and the procedures for identifying and reporting suspicious activities.

COMPLIANCE

How is compliance with the POL going to be monitored	The policy custodian will monitor the regulatory bodies for potential impact and future updates on this policy. Internal audits will be undertaken periodically by the senior finance team to monitor the effectiveness of this policy. Any breaches to this policy will be initially addressed by the policy custodian and appropriate action taken.
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EQUALITY IMPACT ASSESSMENT AND PROCEDURAL INFORMATION

	Positive / Negative / N/A	Comments
Does the document have a positive or negative impact on one group of people over another on the basis of their:		
• age?	N/A	
• disability?	N/A	
• gender reassignment?	N/A	
• pregnancy and maternity (which includes breastfeeding)?	N/A	
• race (including nationality, ethnic or national origins or colour)?	N/A	
• marriage or civil partnership?	N/A	
• religion or belief?	N/A	
• sex?	N/A	
• sexual orientation?	N/A	

If you have identified any potential impact (including any positive impact which may result in more favourable treatment for one particular group of people over another), are any exceptions valid, legal and/or justifiable?	N/A	
If the impact on one of the above groups is likely to be negative:		
• Can the impact be avoided?	N/A	
• What alternatives are there to achieving the document's aim without the impact?	N/A	
• Can the impact be reduced by taking different action?	N/A	
• Is there an impact on staff, client or someone else's privacy?	N/A	<i>If yes, privacy impact assessment required</i>

What was the previous version number of this document?	N/A	
Changes since previous version	This is a new Policy	
Who was involved in developing/reviewing /amending the POL? [list titles]	Chief Executive Officer Finance Director Financial Controller Executive Assistant to CEO	
How confidential is this document?	Public	Can be shared freely within and outside of Helping Hands

References	
Associated Documents	<i>Anti-Corruption and Bribery Policy – HHH-POL-010</i> <i>Handling Customer's Money Policy – HHH-POL-003</i> <i>Gifts, Wills and Legacies Policy – HHH-POL-059</i>