

Anti-Terrorism and Anti Money Laundering Policy (V1.6, EN)

April 2023

Controlled Document Control Sheet			
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Purpose	To ensure that resources are used only for purposes that are consistent with the mission and that we avoid inadvertently lending support or allow resources to be diverted to individuals or organisations engaged in any form of criminality, violence or terrorism or the proceeds of crime to be laundered through our organisation.		
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Approved By	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Board <input type="checkbox"/> Concern Worldwide SMT <input checked="" type="checkbox"/> Board Committee <input type="checkbox"/> Steering Group <input type="checkbox"/> Director <input type="checkbox"/> Manager </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Regional Director <input type="checkbox"/> CMT <input type="checkbox"/> Country Director <input type="checkbox"/> Member of CMT <input type="checkbox"/> Subject Expert </td> </tr> </table>	<input type="checkbox"/> Board <input type="checkbox"/> Concern Worldwide SMT <input checked="" type="checkbox"/> Board Committee <input type="checkbox"/> Steering Group <input type="checkbox"/> Director <input type="checkbox"/> Manager	<input type="checkbox"/> Regional Director <input type="checkbox"/> CMT <input type="checkbox"/> Country Director <input type="checkbox"/> Member of CMT <input type="checkbox"/> Subject Expert
<input type="checkbox"/> Board <input type="checkbox"/> Concern Worldwide SMT <input checked="" type="checkbox"/> Board Committee <input type="checkbox"/> Steering Group <input type="checkbox"/> Director <input type="checkbox"/> Manager	<input type="checkbox"/> Regional Director <input type="checkbox"/> CMT <input type="checkbox"/> Country Director <input type="checkbox"/> Member of CMT <input type="checkbox"/> Subject Expert		
Name	Audit and Risk Committee		
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Cross Reference to other Controlled Documents	Code of Conduct and Associated Policies [Programme Participant Protection Policy, Child Safeguarding Policy, Anti Trafficking in Person's Policy], Anti-Fraud Policy, Whistleblowing Policy, Conflict of Interest Policy, Risk Management Policy, Ethical Fundraising Relationships with the Corporate Sector Policy and Guidelines		
Relevant Laws and Regulations	The UK legislation related to this Policy includes the Bribery Act 2010, the Criminal Finances Act 2017, Proceeds of Crimes Act 2002, Sanctions and Anti-Money Laundering Act 2018 and Terrorism Act 2000. The Irish legislation related to this Policy include the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended by Part 2 of the Criminal Justice Act 2013 and by the Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing) Amendment Act 2021("the CJA 2010").In addition the Proceeds of Crime Act 1996, as amended, the Anti Money Laundering and Countering the Financing of Terrorism Guidelines of Sept 2019, as amended in 2021 and the Criminal Justice (Corruption Offences) Act 2018.		

Date	Version	Changes	Created by
30/11/2012	1.0	Final Draft Initial Policy	Alastair Land
25/04/2016	1.1	Include National Staff CD under Home HR checking category	Conor Gorman
07/10/2019	1.2	Update and include checks on Suppliers to overseas fields.	Jim Hynes
30/06/2020	1.3	Update and include checks required by EU PRAG	Vicky Portnell / Jim Hynes
30/03/2021	1.4	Updated to include Appendix I, other minor changes (typos, terminology, formatting, etc.)	Stephen O'Connor / Jim Hynes
30/05/2022	1.5	Updated to broaden the scope to reference all anti-terrorism and anti-money laundering (AML) measures, to specifically reference AML compliance, to detail a process for designating some countries as high risk and allow for enhanced screening procedures, to confirm the direct application of the policy to subsidiaries and to specifically detail the screening checks they must carry out and to detail a process when screening produces a positive match in an existing relationship.	Maeve Seery/Aoife Gleeson
19/04/2023	1.6	Updated section 6 Reporting to remove reference to separate annual report to be issued to the ARC. Following agreement from ARC that the existing reports at each Committee meeting are sufficient.	Alice Flaherty

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1. POLICY STATEMENT

Concern Worldwide is unequivocally opposed to all forms of criminality, violence and terrorism and by extension, we strongly condemn and prohibit support of any kind to individuals or organisations involved/associated with such activities. Concern's mission and values guide us in this regard as well as our commitment to compliance, in particular that required by:

- Legal instruments;
- Contractual obligations to our donors/funders;
- The guidance and best practice recommendations of regulators.

It is important that Concern has effective, integrated and proportionate measures in place to ensure that its resources are used only for purposes that are consistent with its mission and that it avoids inadvertently lending support or allowing its resources to be diverted to individuals or organisations engaged in any form of criminality, violence or terrorism (hereinafter referred to as "terrorist financing").

In addition, Concern Worldwide will not tolerate or permit the proceeds of crime to be laundered through our organisation in an attempt to disguise their origin. This policy aims to clearly set out our measures to avoid terrorist financing and money laundering.

2. APPLICATION OF THE POLICY

The procedures outlined in this Policy apply to Concern offices, wherever located, unless otherwise stated. For the purposes of this Policy 'Concern' shall be taken to mean Concern Worldwide, Concern Worldwide UK and its subsidiaries, Concern Charity Trading, Concern Worldwide Korea Foundation and all Concern Worldwide overseas branch offices unless otherwise stated (collectively the "group"). Concern Worldwide US has its own separate and distinct policy which aligns with this Policy.

Where stated, partners should be taken to mean all national/local and international partners, sub grantees, consortia member organisations and private sector entities/suppliers with which Concern engages. Government engagement should not be considered a partnership for the purposes of this policy.

The procedures as outlined in the Policy apply equally in all countries of operation and Concern's approach to counteracting terrorist financing and money laundering, as outlined here, is deemed sufficiently robust to withstand pressures which may exist in those locations. Where countries are deemed by Concern to be at high risk of terrorist financing and /or money laundering, and more susceptible to exposure, enhanced measures can be put in place.

Appendix I to the Policy sets out Concern's process for designation of our countries of operation into a high risk category and the manner in which enhanced measures can be applied.

3. CONCERN'S APPROACH TO MANAGING THE RISKS OF TERRORIST FINANCING AND MONEY LAUNDERING

The measures taken by Concern to manage the risk of terrorist financing and money laundering are as follows:

- i. **Good Governance;**

The organisation has high standards of corporate governance in place. These include having constitution, a board and defined management structures in place. In addition, there is an annual organisational risk review and reporting to the Audit and Risk Committee of the Concern Worldwide Board on any matters of significance related to this Policy.

ii. Financial Management;

There are developed financial systems and controls in place to ensure that all funds received by Concern are fully accounted for, used effectively and spent in a manner that is consistent with the objectives of the organisation and any attaching conditions.

Key controls are outlined in documents such as the Delegation of Authority, the Overseas Finance Manual, the HQ Finance Manual and the Treasury Policy. High degrees of disclosure are provided through donor reporting and the organisation's annual report and accounts.

Section 5 of the Overseas Finance Reference Manual outlines the key controls and procedures that must be followed in relation to the banking arrangements and the transfer of funds to our countries of operation.

iii. Sanctions and Screening;

Economic sanctions restrict dealings with certain individuals or entities, apply restrictive measures against a whole country, and control exports of particular products. One of the largest sanctions risks for Concern is inadvertently dealing directly or indirectly with a restricted person or entity. Indirect dealing includes when a third party is acting on behalf of the restricted person.

As outlined in section 4, to mitigate these risks, Concern screens individuals and entities against a broad range of international lists and registers to determine whether they are the subject of any sanctions ("screening checks").

In addition, Concern monitors country specific sanctions (on a periodic basis) to determine if suitable humanitarian exemptions are in place to allow our continued operation in countries where sanctions apply.

iv. Relations with Partners;

Prior to entering into any arrangements with partner organisations, appropriate due diligence processes are carried out. These assess any potential partner's identity, management, financial position, programme activities, external relations and general capacity. This ensures that Concern only enters into partnership arrangements with organisations with whom it has a full understanding and confidence in their ability to manage resources and deliver quality programmes.

All partnership arrangements are governed by a comprehensive, legally binding agreement or memorandum of understanding (MOU) which provides Concern with rights to both monitor and manage the relationship. Any agreements entered into with Partners will, where required, include clauses requiring Partners to implement appropriate measures to guard against making funds or economic resources available by way of terrorist financing.

In addition, Partners will be subject to screening checks, as provided for in section 4.

v. Relations with Donors;

Concern is completely reliant on donors (whether they are institutional or individuals) to fund its activities. Concern's fundraising policies and processes include due diligence and anti-money laundering measures to ensure compliance with "know your donor" requirements. Those are set out in detail in Concern's Policy and Guidelines on Ethical Fundraising Relationships with the Corporate Sector. Particular vigilance is applied to the following:

- Unsolicited donations offered at short notice or via an unknown third party;
- Donations offered in the form of a loan;
- Donors who ask for all or part of a donation to be returned at a later date;
- Donations offered for a specific project where the donor insists that a particular third party is used as a partner or supplier on the project;
- Donations that have unusual or disproportionate conditions attached;
- Donations from a shell company or that is established as a trust and who is unwilling to provide additional information about its beneficial owners or underlying beneficiaries in response to a request for such information.

The standard screening checks referenced at section 4 do not mandate specific checks on donors, however these would occur if there were circumstances detailed in the Ethical Fundraising Relationships policy which merited investigation.

vi. Relations with Beneficiaries;

We have a presence in all of the countries where we utilise resources and Concern's programme activities are designed to ensure that there is effective engagement with beneficiaries. Concern has effective selection and verification processes in place for determining the eligibility of beneficiaries for inclusion in our programme. As a guiding principle Concern will not carry out screening checks against beneficiaries except in the circumstances outlined in section 4 below. Concern is certified against the Core Humanitarian Standard (CHS) and as such, our programme activities are designed to ensure that we are accountable to our beneficiaries.

vii. Awareness and Compliance;

Concern stays up-to-date with legal and regulatory changes both nationally and internationally, and communicates relevant information to ensure global compliance.

viii. Staff Training;

Concern raises awareness among staff and partners, and provides requisite training to implement this policy effectively.

ix. Concern's Policies;

Concern enforces a Code of Conduct (CoC) amongst its staff, who sign up to the Code on joining the organisation. The Code (and its associated policies) holds staff to the highest standards in terms of their personal behaviour and their use and application of Concern's resources. The following Concern policies are applicable:

- Programme Participant Protection Policy (Associated policy to the CoC)
- Child Safeguarding Policy (Associated policy to the CoC)
- Anti-Trafficking in Person's Policy (Associated policy to the CoC)
- Anti-Fraud Policy
- Whistleblowing Policy
- Conflict of Interest Policy
- Risk Management Policy
- Ethical Fundraising Relationships with the Corporate Sector, Policy and Guidelines

4. SPECIFIC SCREENING CHECKS REQUIRED BY THIS POLICY

In order to avoid inadvertent support to or connection with any undesirable bodies (organisations or individuals), and to ensure compliance with relevant legislation and donor/funder contractual obligations, Concern will conduct screening checks i.e. to screen the identities of various internal and external stakeholders against a series of international registers (see Appendix II). Concern has subscribed to a specialist system 'Bridger Insight Online'¹ which allows all the relevant international registers to be checked by one system.

This section outlines clear timeframes and what checks should be carried out at Head Office in Dublin, by our UK and Korea offices and in each of the overseas fields. The frequency of the screening required also varies, this represents a judgement based on a number of factors - mainly perceived risk and level of responsibility.

It should be noted that for US Government grants approval must be sought in advance for the use of third party providers / hawala / cash facilitators. Screening checks must be performed for all such providers.

¹ A manual has been prepared outlining how to access and use the Bridger Insight system.

4.1 Dublin Head Office Checks to be conducted

Check To Be Conducted	When?	Who Is Responsible?	If There Is a Match?	Recheck Required? ²
New Board and Committee members	Prior to an individual being confirmed as Council or Sub-Committee Member.	The Assistant Company Secretary (in conjunction with the Corporate Services Officer).	The individual should not be appointed to Board or the relevant Board Committee.	Annually i.e. for all persons who were members during the calendar year.
Senior Management Team (SMT)	Prior to an individual being offered a place on SMT.	Director of Human Resources (the check on the Director of Human Resources will be completed by the Director of Compliance Services).	The appointment should not be confirmed and details of the positive match should be passed to the Chief Operations Officer (COO).	Annually i.e. for all persons who were members during the calendar year.
Key Head Office management staff prior to a contract being offered (to avoid uncertainty this will comprise staff on grade 7 or above).	The same time as an individual's references are being investigated.	Director of Human Resources	No contract of employment should be offered to the individual.	Annually
International Staff who are to hold key field management positions (to avoid uncertainty this will comprise specifically the CD, Systems Director, Programmes Director and Country Financial Controller).	The same time as an individual's references are being investigated.	Director of Human Resources	No contract of employment should be offered to the individual.	Annually
Country Directors (National & International)	The same time as an individual's references are being investigated.	Director of Human Resources	No contract of employment should be offered to the individual.	Annually
Banks, whose accounts are managed by Head Office.	Prior to an account being opened with any new financial institution that has not been checked before.	Finance Director	The institution should not be used.	Annually i.e. for all banks with which accounts were in existence during the calendar year.

² In the event that an annual (repeat), check of an individual or organisation with which Concern has an existing relationship results in a verified positive match then the Chief Operations Officer (COO), should be informed.

Check To Be Conducted (cont.)	When?	Who Is Responsible?	If There Is a Match?	Recheck Required?
<p>Donors, specifically private individuals and /or corporates [<i>being a corporate profit making organisation or a corporate foundation which derives the majority of its funds from a corporate</i>]. For corporates it is necessary to screen the institution and three key individuals of the corporate i.e. Board Members/Directors.</p>	<p>For any donation in excess of €20k prior to it being accepted.</p>	<p>Head of Major Donors & Corporate Fundraising</p>	<p>The donation should not be accepted.</p>	<p>Annually</p>
<p>Partners (including all Agencies with which we have signed a Consortium Agreement³ and any other sub-grantees) being managed by Head Office. It is necessary to screen the institution itself and three key individuals of the Partner, i.e. Board Members/Directors (CEO/Finance Director etc).</p>	<p>Prior to any partnership agreement being signed/joint activities commencing.</p>	<p>The individual responsible for signing contracts and engaging with the partner and consortia is responsible for requesting that the Corporate Services Officer carry out the relevant check.</p>	<p>No partnership agreement should be signed and no joint activities undertaken.</p>	<p>Annually i.e. for all partners utilising grants from Concern during the calendar year.</p>
<p>New Alliance Partners. It is necessary to screen the institution itself and three key individuals of the Partner, i.e. Board Members/Directors.</p>	<p>Prior to being admitted to the Alliance.</p>	<p>The IPD Director is responsible for requesting that the Corporate Services Officer carry out the relevant check.</p>	<p>We inform our existing Partners and the new Partner should not be admitted to the Alliance.</p>	<p>No, unless a credible allegation is made linking the organisation to undesirable activity.</p>
<p>New Corporate Membership Organisations i.e. formal/institutionalised groupings/alliances that are intended to be on-going for more than three years and that charge a membership fee.</p>	<p>Prior to Concern joining the organisation.</p>	<p>The individual who wishes to commit Concern to the organisation is responsible for requesting that the Corporate Services Officer carry out the relevant check.</p>	<p>Concern should not join the organisation.</p>	<p>No, unless a credible allegation is made linking the organisation to undesirable activity.</p>

³ It is not necessary to check the Partners engaged by fellow Consortium Agencies.

Check To Be Conducted	When?	Who Is Responsible?	If There Is a Match?	Recheck Required? ⁴
Suppliers of goods, services and works where the value of the purchase transaction/contract exceeds €50,000 (in lump sum or in aggregate over 12 months).	Prior to receiving or committing to the receipt of the relevant goods or services.	The individual responsible for signing the contract and engaging with the supplier is responsible for requesting that the Corporate Services Officer carry out the relevant check.	The planned supply should be cancelled in its entirety and alternative suppliers sought.	Annually
<p>Beneficiaries where:</p> <ul style="list-style-type: none"> The beneficiary is a natural living person i.e. not a corporate or an organisation. <p>AND</p> <ul style="list-style-type: none"> The value being transferred to that person (either in cash or in kind), exceeds €30,000 in any one year. <p>(Examples of what is envisaged here would be scholarships, training grants etc.).</p>	Prior to transfers occurring.	The individual who wishes to commit Concern to the transfers is responsible for requesting that the Corporate Services Officer carry out the relevant check.	Concern should not support the intended beneficiary in any form.	No, unless a credible allegation is made linking the person to undesirable activity.
Ad Hoc Checks – There may be situations where there is a requirement to check individuals/entities not listed above. An example could be where a funder requires that programme staff and/or consultants are checked.	Prior to Concern entering into any contractual obligations which would require the additional checks to be completed.	The individual who wishes to commit Concern to the relevant arrangement is responsible for requesting that the Corporate Services Officer carry out the relevant check.	Refer matter to Chief Operations Officer (COO).	No, unless a credible allegation is made linking the organisation to undesirable activity.

⁴ In the event that an annual (repeat), check of an individual or organisation with which Concern has an existing relationship results in a verified positive match then the Chief Operations Officer (COO), should be informed.

4.2 Field Office Checks to be conducted

Check To Be Conducted	When	Who Is Responsible	If There Is a Match?	Recheck Required? ⁵
National Staff who are to hold key field management positions (to avoid uncertainty this will comprise specifically the Systems Director, Programmes Director and Country Financial Controller) ⁶	<ul style="list-style-type: none"> - For new staff members, prior to their appointment to the organisation. - For existing staff members, prior to their appointment to a key field position. 	Country Director	<ul style="list-style-type: none"> – For new potential staff members, they should not be offered employment. – For existing staff members, the matter should be referred to the relevant Regional Director / Head of Emergency Operations and Chief Operations Officer (COO). 	Annually i.e. for all persons who were members during the calendar year.
Any staff not already checked at time of recruitment where the individual is included as key personnel under a new award which requires an updated check to be performed (e.g. USAID)	Prior to submission of the application for the award or (when appointments are made during the course of an award), prior to the nomination of the person to the donor for the role.	Country Director	<ul style="list-style-type: none"> – If the individual is a proposed hire, no contract of employment should be offered to the individual. – If the check was conducted as part of a promotion, internal transfer or assignment to a particular project, see section 2.4.2. 	Annually

⁵ In the event that an annual (repeat) check of an individual or organisation with which Concern has an existing relationship results in a verified positive match, then the relevant Regional Director/Head of Emergency Operations and Chief Operations Officer (COO), should be informed.

⁶ Should it be a requirement under local legislation you should disclose to new potential staff members, partners or beneficiaries that these checks will be conducted

Check To Be Conducted (cont.)	When	Who Is Responsible	If There Is a Match?	Recheck Required?
Banks, whose accounts are managed by the field.	Prior to an account being opened with any new financial institution who has not been checked before.	Country Director	The institution should not be used.	Annually i.e. for all banks with which accounts were in existence during the calendar year.
Partners (including sub-grantees and Consortium Partners) being managed by the field. It is necessary to screen the institution itself and three key individuals of the Partner, i.e. Board Members/Directors ⁷ .	Prior to any partnership agreement being signed/joint activities commencing.	Country Director	No partnership agreement should be signed and no joint activities undertaken.	Annually i.e. for all partners utilising grants from Concern during the calendar year.
Suppliers of goods, services and works where: <ul style="list-style-type: none"> – The value of the purchase transaction/contract exceeds €50,000 Or <ul style="list-style-type: none"> – The supply of the particular goods/services sought might confer an advantage on a subversive organisation e.g. the collection of data or the direct distribution of goods to target populations. Or <ul style="list-style-type: none"> – The geographic area of supply is identified as high risk by HO SMT and checks are specifically required in that area 	Prior to receiving or committing to the receipt of the relevant goods or services.	Country Director	The planned purchase should be cancelled in its entirety and alternative suppliers sought.	Yes, it should be completed at each qualifying supply unless it has already been checked less than 12 months previously.

⁷ Should it be a requirement under local legislation you should disclose to new potential staff members, partners or beneficiaries that these checks will be conducted

Check To Be Conducted (cont.)	When	Who Is Responsible	If There Is a Match?	Recheck Required?
<p>Beneficiaries where:</p> <ul style="list-style-type: none"> – The beneficiary is a natural living person i.e. not a corporate or an organisation. <p>AND</p> <ul style="list-style-type: none"> – The value being transferred to that person (either in cash or in kind), exceeds €30,000 in any one year. <p>Examples of what is envisaged here would be scholarships, training grants, capital grants for construction etc.</p>	Prior to transfers occurring	The individual who wishes to commit Concern to the transfers is responsible for requesting that the Corporate Services Administrator carry out the relevant check.	Concern should not support the intended beneficiary in any form.	No, unless a credible allegation is made linking the person to undesirable activity.
Ad Hoc Checks – There may be situations where there is a requirement to check individuals/entities not listed above. An example could be where a funder requires that certain programme staff are checked.	Prior to Concern entering into any contractual obligations which would require the additional checks to be completed.	The individual who wishes to commit Concern to the relevant arrangement is responsible for requesting that the Country Director carry out the relevant check.	Refer matter to relevant Regional Director/Head of Emergency Operations and Chief Operations Officer (COO).	No, unless a credible allegation is made linking the organisation to undesirable activity.

4.3 Subsidiary Office Checks to be Conducted

Concern Worldwide UK [CWUK] and Concern Worldwide Korea Foundation [CK]

Check To Be Conducted	When?	Who Is Responsible?	If There Is a Match?	Recheck Required?⁸
Board and members Committee	Prior to an individual being confirmed as Council or Sub-Committee Member.	CK: The Director of Operations CWUK: The Director of Finance and Operations	The individual should not be appointed to Board or the relevant Board Committee.	Annually i.e. for all persons who were members during the calendar year.
Senior Management Team (SMT) / Executive Team	Prior to an individual being offered a place on the team.	CK: The Director of Operations CWUK: The Director of Finance and Operations The check on the Directors above will be carried out by the Corporate Services Officer for CWW.	The appointment should not be confirmed and details of the positive match should be passed to the Chief Operations Officer (COO) of Concern Worldwide.	Annually i.e. for all persons who were members during the calendar year.
Key Head Office management staff prior to a contract being offered (to avoid uncertainty this will comprise staff on grade 6 or above).	The same time as an individual's references are being investigated.	Director of Human Resources or equivalent	No contract of employment should be offered to the individual.	Annually
Banks, whose accounts are managed by the respective Head Office of the subsidiary.	Prior to an account being opened with any new financial institution this has not been checked before.	Finance Director or equivalent in Dublin	The institution should not be used.	Annually i.e. for all banks with which accounts were in existence during the calendar year.

⁸ In the event that an annual (repeat), check of an individual or organisation with which CWUK OR CK has an existing relationship results in a verified positive match then the Chief Operations Officer (COO) of Concern Worldwide, should be informed.

Check To Be Conducted	When?	Who Is Responsible?	If There Is a Match?	Recheck Required? ⁹
Partners (including all Agencies with which we have signed a Consortium Agreement ¹⁰ and any other sub-grantees) being managed by the subsidiary company office. It is necessary to screen the institution itself and three key individuals of the Partner, i.e. Board Members/Directors.	Prior to any partnership agreement being signed/joint activities commencing. This should normally be done as part of the due diligence checks.	The individual responsible for signing contracts and engaging with the partner and consortia is responsible for requesting that the Director of Finance and Operations (UK) or the CK Head of Operations carry out the relevant check.	No partnership agreement should be signed and no joint activities undertaken.	Annually i.e. for all partners utilising grants from Concern during the calendar year.
New Corporate Membership Organisations i.e. formal/institutionalised groupings/alliances that are intended to be on-going for more than three years and that charge a membership fee.	Prior to CWUK/CK joining the organisation.	The individual who wishes to commit Concern to the organisation is responsible for requesting that the Director of Finance and Operations (UK) or the CK Head of Operations carry out the relevant check.	CWUK/CK should not join the organisation.	No, unless a credible allegation is made linking the organisation to undesirable activity.
Suppliers of goods, services and works where the value of the purchase transaction/contract exceeds €50,000 (in lump sum or in aggregate over 12 months).	Prior to receiving or committing to the receipt of the relevant goods or services.	Director of Finance and Operations (UK) or the CK Head of Operations	The planned purchase should be cancelled in its entirety and alternative suppliers sought.	Annually

⁹ In the event that an annual (repeat), check of an individual or organisation with which CWUK OR CK has an existing relationship results in a verified positive match then the Chief Operations Officer (COO) of Concern Worldwide, should be informed.

¹⁰ It is not necessary to check the Partners engaged by fellow Consortium Agencies.

Check To Be Conducted	When?	Who Is Responsible?	If There Is a Match?	Recheck Required? ¹¹
Ad Hoc Checks – There may be situations where there is a requirement to check individuals/entities not listed above. An example could be where a funder requires that certain programme staff and/or consultants are checked.	Prior to CWUK/CK entering into any contractual obligations which would require the additional checks to be completed.	The individual who wishes to commit CWUK/CK to the relevant arrangement is responsible for requesting that the Director of Finance and Operations (UK) or the CK Head of Operations carry out the relevant check.	Refer matter to Chief Operations Officer (COO) of Concern Worldwide.	No, unless a credible allegation is made linking the organisation to undesirable activity.
Donors, specifically private individuals and /or corporates [<i>being a corporate profit making organisation or a corporate foundation which derives the majority of its funds from a corporate</i>]. For corporates it is necessary to screen the institution and three key individuals of the corporate i.e. Board Members/Directors.	For any donation in excess of €20k prior to it being accepted.	The individual who wishes to commit CWUK/CK to the relevant arrangement is responsible for requesting that the Director of Finance and Operations (UK) or the CK Head of Operations carry out the relevant check.	The donation should not be accepted. Due diligence procedure for rejecting donations should then be followed (CUK)	Annually

¹¹ In the event that an annual (repeat), check of an individual or organisation with which CWUK OR CK has an existing relationship results in a verified positive match then the Chief Operations Officer (COO) of Concern Worldwide, should be informed.

4.3 Quality Control of Checks

The COO will designate the responsibility of administering the Bridger Insight system. Checks will be carried out twice yearly (mid-year and end of year) to review the activity of each relevant member of the Concern Group to ensure compliance and that screening checks are being conducted and matches are being correctly closed i.e. either recognised as real matches or proven to be false ones, on the system.

In the event that any member of the Concern Group is not conducting on-going checks, or is not closing off matches correctly, the relevant SMT Member/Executive Management member/ Regional Director//Head of Emergency Operations will be contacted in order that corrective action can be taken. All Overseas fields and responsible managers in Dublin, London and Seoul will be asked at the end of each year to confirm that they have complied with this policy and that all necessary checks have taken place (this will happen at the same time as they are being asked to confirm that all of their relevant registrations are up to date).

At any time, spot checks may be carried out on any member of the Concern Group to ensure that checks are complete and up to date.

As part of the internal audit programme the internal audit manager will carry out periodic checks of all members of the Concern Group to ensure that this policy is being adhered to in full.

4.4 Waivers

In **exceptional** circumstances there may be legal and security considerations which make it inadvisable for a small number of Concern's overseas fields to conduct **some** of the checks outlined in section 4.2. The Concern Worldwide COO has sole authority to issue a waiver and will only do so in the following circumstances:

- **Legality Issues:** Where national legal systems prohibit either the checking of individuals against certain international lists or the refusal of employment if there is a match.
- **Security Issues:** Where the conducting of certain checks will cause an unacceptable security risks to Concern resources and staff in the field.

In order to apply for a waiver the relevant Country Director may apply in writing to her/his line manager (the relevant Regional Director or Head of Emergency Operations), who will in turn consult with the IPD Director/Emergencies Director (as appropriate); if they agree with the application, they will request approval from the Concern Worldwide COO for a waiver. The written application must be accompanied by:

- i. A detailed written request outlining the reasons for the request and the specific checks for which the waiver is being sought.
- ii. Competent legal advice as to why carrying out the relevant check in country would be contrary to local law (only relevant if a waiver is being sought due to a legality issue).
- iii. A proposal as to what alternative procedures can be adopted to meet the underlying objective.

Any waivers granted will be from specific required checks and will be limited in duration. All waivers granted will be reported to governing bodies annually (see below).

4.5 Process when a check results in a match

4.5.1 Engaging an Individual or Organisation For Whom There Is A Positive Match.

There may be very rare situations in which the organisation wishes to engage an individual or organisation for whom there has been a positive match on the Bridger Insight system. In such a situation it **may** be possible to apply to the relevant authorities for permission to engage the individual/entity.

The Concern Worldwide COO is responsible for assessing whether such applications should be made and overseeing the submission of any application deemed appropriate. Should a member of the Concern Group feel that an application is merited, the relevant SMT Member/Executive Management team Member/Regional Director/Head of Emergency Operations/Country Director should contact the COO. The COO will in all cases discuss any such proposals with the Chair of the Concern Worldwide Audit and Risk Committee, and with the *Serious Incident Monitoring Group*. **No individual or organisation for which there is a positive match should be engaged without this advance consultation and approval.**

4.5.2 Process when a Positive Match appears for a Current Employee or Partner

If any current employee, vendor/supplier/service provider or partner organisation appears on any of the lists checked, and it is determined that it is not the result of a mismatch then this shall be notified immediately by the Head office Directorate, subsidiary company office or overseas Field office to their relevant SMT Member / Executive Management team Member/ Regional Director / Head of Emergency Operations / Country Director. Where the match pertains to an employee then notification to the Director of HR must also be made. Those notified should contact the Concern Worldwide COO. The COO will in all cases refer any such incidences to the Chair of the Concern Worldwide Audit and Risk Committee, and the *Serious Incident Monitoring Group* (including a representative of any other Concern group organisation providing funding to that country programme in question). A decision as to next steps will be taken as promptly as possible.

5. Responsibility of All Concern Staff

Should any Concern employee identify any suspicious transaction or activity involving the use of resources provided by Concern, that they think is linked to a criminal/violent/terrorist organisation/activity they should report this using the guidelines contained in Concern's *Anti-Fraud* or *Whistleblowing* Policies. Any suspicions which are reported in this way should be raised immediately with the Concern Worldwide COO.

6. Reporting

Regular reports on activities carried out pursuant to this policy will be prepared and reviewed by the Serious Incident Monitoring Group. These reports provide an update of checks performed, results obtained, any waivers granted or other significant issues in relation to this policy. The Concern Worldwide COO provides an update from this SIMG report to the Audit and Risk Committee of Concern Worldwide. This reporting confirms that Concern Worldwide is:

- Unequivocally opposed to all forms of criminality/violence/terrorism and prohibits support of any kind to individuals or organisation involved/associated with such activities.

- Aware of the legislative and contractual requirements to which the organisations are subject and implementing an effective and appropriate policy to ensure the actions of Concern Worldwide do not lead to a breach of these requirements.
- Conducting appropriate checks to ensure compliance with its policy.

6. Review of this Policy

Due to the constantly evolving nature of legislative/contractual requirements in this area and the threat posed to the organisation, it is necessary that this policy is kept under regular review to ensure it remains effective. This policy will be reviewed by Concern Worldwide SMT and the Audit and Risk Committee every 2 years.

Appendix I – Designation of Countries as High Risk

Concern's designation of countries into a high risk category for the process of putting in place enhanced measures to counteract terrorist financing and money laundering is determined by applying the following considerations.

Consideration	Comment
1. Is the country subject to any material international comprehensive (country wide) sanctions regime which Concern is obliged to adhere to for that particular country? ¹²	If Yes enhanced measures should be applied
2. Is the country one which the Charities Regulatory Authority deems to be high risk from a money laundering and terrorist financing perspective? ¹³ The countries are those listed in EU Commission Delegated Regulation 2016/1675 - EUR-Lex - 32016R1675 - EN - EUR-Lex (europa.eu)	If Yes, enhanced measures should be applied
3. Is the country one which any significant third party supplier to Concern considers to be higher risk? ¹⁴	If Yes, enhanced measures should be considered
4. Is the country one where terrorists, proscribed groups and designated individuals/ entities are known to operate or have influence?	If Yes, enhanced measures should be considered
5. Is the country one where any of the following factors prevail: weaker government and levels of regulation, instability, conflict or other complex emergencies?	If Yes, enhanced measures should be considered

The Corporate Services Compliance Officer in Dublin carries out this check annually. As outlined above, where the responses to Questions 1 and 2 are positive, then enhanced measures should be applied and in all other cases they should be considered.

The decision as to:

- whether or not to apply enhanced measures, and
- where enhanced measures are to apply, what those specific measures should be

Shall be jointly taken by the relevant Regional Director, the IPD Director/Emergency Director, the Director of Compliance Services and the COO, with notification of the decision taken being made to SMT and the Audit and Risk Committee.

The application of enhanced measures to a country should be annually reviewed by the decision makers named above no later than the end of the first quarter.

The enhanced measures which can be applied in addition to the standard measures detailed in section 4 can be some or all of those detailed below:

1. Additional checks on National Staff who hold certain positions and have not been checked already.
2. Additional checks on Partner Staff who hold certain positions and have not been checked already.
3. Lowering the threshold for when checks are required on suppliers.

¹²For example, consider UN, EU, US and UK sanctions which are material in view of donor funding in that country of operation

¹³[guidance-on-anti-money-laundering-and-counter-terrorist-financing-for-charities.pdf](#) (charitiesregulator.ie).

¹⁴ Concern's insurance broker shares a list of "sanctioned countries" each year at the point of annual renewal of our worldwide insurances - Regulatory and Legal Disclosures - Ireland - WTW (wtwco.com).

Appendix II – List of International Registers subscribed to for the purposes of this policy

CA – Public Safety Canada
CA – OSFI Enforcement
CA – Suppression of Terrorism
CA – Special Economic Measures against Iran
CA – Special Economic Measures
EU – European Commission
EU – European Union List
Interpol
UK – Disqualified Directors
UK – Her Majesty’s Treasury Financial Sanctions
UK – HM Revenue and Customs
UK – Home Office
UK – London Police
UK – Metropolitan Police
UK – UK Home Office Proscribed Terrorist Groups
UN – United Nations Children and Armed Conflict – Persistent Offenders
UN – United Nations Security Council Resolution 1267 (1999) 1989 (2011) and 2253 (2015) concerning ISIL (Da’esh), Al-Qaida and associated individuals and entities
UN – United Nations Security Council Resolution 1988 (2011)
UN – United Nations Security Council Resolution 2231 (2015) – Iran Nuclear Proliferation
UN – Security Council Resolution 2140
UN – Security Council Resolution 1533
UN – Security Council Resolution 1718
UN – Security Council Resolution 1970
UN – Security Council Resolution 2048
UN – United Nations Development Programme
UN – United Nations International Criminal Tribunal for the Former Yugoslavia
UN – United Nations Office for Project Services
UN – United Nations Security Council 1518 (2003) - Iraq
UN – United Nations Security Council 1591 (2005) - Sudan
UN – United Nations Security Council 2127 (2013) – Central African Republic
UN – United Nations Security Council 2206 (2015)
UN – United Nations Security Council 2374 (2007) – Mali
UN – United Nations Security Council 751 (1990) and 1907 (2009) – Somalia and Eritrea
US – OFAC CAPTA Sanctions
US – OFAC Foreign Sanctions Evaders List
US – OFAC Sectoral Sanctions Identifications
US – The System for Award Management (SAM)
US – US Excluded Parties List System (EPLS)
US – U.S. OFAC – EO13808
US – U.S. OFAC – Palestinian Legislative Control List
US – U.S. Office of Foreign Asset Control (OFAC) – Advisory to the Maritime Petroleum Shipping Community
US – U.S. Office of Foreign Asset Control (OFAC) – Civil Penalties Actions
US – U.S. Office of Foreign Asset Control (OFAC) – Enforcement Information
US – U.S. Office of Foreign Asset Control (OFAC) – Ownership Interest – Associated Sanctions
US – U.S. Office of Foreign Asset Control (OFAC) – Sanctions Ownership or Control
US – U.S. Office of Foreign Asset Control (OFAC) – SDN List
World Bank List of Debarred Firms