

Anti-Money Laundering and Counter-Terrorist Financing Policy

Pocket Money Adventures CIC | Version 1.1

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Purpose and scope

Applies to CIC grants, sponsorship, donations and trading. Prevent receipt or use of criminal property or terrorist funds under applicable POCA and Terrorism Act duties. PMA's educational activity is not automatically a regulated-sector business under the Money Laundering Regulations; reassess any change in activity. Nathan is the internal reporting lead, not an assertion of regulated-sector status.

Actual risk assessment

Do not assume every sponsor is a UK company, every payment is a bank transfer, all donors are identified or the live payment flow is verified. Assess source, payment channel, donor/organisation, geography, amount, restrictions and related-party risks before acceptance. Card/payment-processor receipts can be used if authorised, auditable and reconciled; standard grant/sponsorship payments do not accept cash or cryptocurrency.

Due diligence

For a payment or connected series above £5,000, verify legal identity, the payer relationship, signatory authority and source/purpose. Above £25,000, add documented financial/source checks. These are internal thresholds, not statutory reporting triggers; suspicious lower amounts still require review. A certificate of incorporation does not establish current signatory authority. Individuals and non-company organisations use proportionate equivalent checks. Assess ethical funding and conflicts separately.

Red flags

Escalate unexplained third-party payments, unusual amounts or frequency, threshold splitting, unclear origin, secrecy requests, pressure to refund elsewhere, unverifiable identity and inconsistent restrictions. Pause a suspicious transaction; do not return or move funds until a lawful route is established.

Reporting and lawful action

Report immediately to Nathan; concerns about him go to an uninvolved director or lawful external route. Assess with competent advice whether an NCA Suspicious Activity Report, terrorist-financing report or defence against money laundering is needed. Regulated-sector reporting offences are not described as applying universally to every CIC receipt; obligations depend on facts and applicable law. Do not proceed with a potentially prohibited transaction while the reporting/defence position is unresolved. Avoid unlawful tipping off or prejudicing an investigation.

Records, training and review

Keep verification, approvals, payment trail and rationale securely for normally five years after the relationship/transaction, or longer where finance or grant retention applies. Financial records normally six years; stricter grant terms govern. Brief finance-handling personnel annually and at induction; record completion. Review risk on new payment methods, countries, funding models, material transactions or concerns and at least annually.

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.