

Anti-Fraud, Anti Money Laundering (AML) Policy

Introduction

As a medical charity operating with industry partners, donors, grant makers, and national and international funders, BSACI acknowledges the financial crime risks to which it is exposed, including fraud, money laundering, terrorist financing, sanctions breaches, and associated reputational and regulatory harm. BSACI adopts a zero-tolerance approach to fraud, bribery, corruption, money laundering, terrorist financing, and sanctions violations.

1. Purpose of Policy

To safeguard BSACI against fraud and money laundering by ensuring compliance with legal and ethical standards.

2. Scope of policy

This policy applies to BSACI employees, trustees & committee members, consultants, suppliers and other third parties on what money laundering & fraud is, how to recognise it and how to report concerns and instances of them, and the principles underpinning good practice, risk mitigation and due diligence. It is designed to align with the expectations of the Charity Commission for England and Wales, including guidance on internal financial controls, trustee duties, safeguarding charitable assets, and serious incident reporting. It demonstrates BSACI's commitment to taking proportionate, reasonable, and risk-based steps to prevent financial crime across all areas of activity.

3. Statement

This Policy outlines the British Society for Allergy & Clinical Immunology's (BSACI) commitment to maintaining the highest standards of integrity, transparency, and accountability.

Through this policy and associated BSACI policies and procedures, we aim to deter, detect and investigate activity which may involve fraud & money laundering and give guidance on what BSACI employees, trustees & committee members, consultants, suppliers and other third parties are expected to do to ensure that we counter these.

BSACI Trustees aim is to combat fraud and anti-money laundering (AML) through robust Due Diligence procedures. This involves a risk-based approach to verify the identity and legitimacy of partners and donors, ensuring that funds are not derived from or used for illegal activities.

4. Culture and Ethical Standards

BSACI promotes a culture grounded in integrity, accountability, and ethical conduct. Trustees, senior leaders, and staff are expected to model exemplary behaviour and uphold the highest standards of governance.

5. Definitions

Money laundering is defined in the Proceeds of Crime Act (2002) as:
the process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises.

The [Fraud Act 2006](#) defines fraud as a single offence committed in three distinct ways:
by false representation, by failing to disclose information when under a legal duty to do so, or by abusing a position of trust, all requiring dishonesty with intent to make a gain or cause a loss (or risk of loss) for oneself or another.

6. Roles and Responsibilities

All BSACI employees, trustees & committee members, consultants, suppliers and other third parties are responsible for familiarising themselves and complying with this policy. All employees must complete mandatory training and be alert to the risk of fraud and money laundering.

BSACI Trustees are responsible for maintaining robust internal systems of control to help prevent and detect fraud in line with the [Charity Commission guidance on internal financial controls for charities](#);

Independent Examiners are appointed to prepare financial statements annually in accordance with BSACI accounting policies, and comply with the Memorandum and Articles of Association, the Companies Act 2006, Accounting and Reporting by Charities: Statement of Recommended Practice (SORP) applicable to charities preparing their accounts in accordance with the Financial Reporting Standard in the UK and Republic of Ireland.

7. Other helpful guidance

The Charity Commission guidance in relation to fraud which provides further [information and advice](#).

The Home Office [guidance](#) to organisations on the offence of failure to prevent fraud.

Help sheets and further resources on the [Prevent Charity Fraud website](#).

8. Reporting suspicious transactions or activity

BSACI expects all employees, trustees & committee members, consultants, suppliers and other third parties to report all reasonable suspicions of fraud. We will notify BSACI Trustees who will investigate all instances of actual, attempted and suspected fraud and work with

and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action.

If you are unsure whether a matter falls within the scope of this policy or wish to report suspected fraudulent activity, this can be discussed with the Chief Executive initially. If you feel this is not appropriate or it relates to the Chief Executive, you can contact the BSACI Treasurer directly by calling the BSACI 0207 501 3910 and obtaining the contact for the BSACI Treasurer.

Anyone could be committing an offence under AML law if they suspect money laundering is taking place, or if they become involved in such activity in some way and do nothing about it. If any BSACI employees, trustees & committee members, consultants, suppliers and other third parties suspect that money laundering activity is happening or has taken place it must be reported as soon as possible. Failure to do so could result in prosecution.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Employees can obtain free independent advice from charity Protect on 0203 117 2520.

9. Steps to take

- (a) If you become aware of suspected fraud or irregularity, write down your concerns immediately. Make a note of all relevant details, such as what was said in phone or other conversations, the date, the time and the names of anyone involved.
- (b) Report the matter immediately to the CEO. If the CEO is implicated in the matter, it should be reported directly to the BSACI Treasurer.
- (c) When you report your concerns, arrange to hand over your notes and any evidence you have gathered to the appropriate investigator. Confidentiality for all parties will be maintained over reports.

You must not:

Contact or discuss the matter with the suspected perpetrator.

Discuss the case facts, suspicions, or allegations with anyone else inside or outside of BSACI unless asked specifically to do so for example by those investigating or;

Attempt to personally conduct investigations or interviews yourself.

10. Investigation Process

The BSACI CEO oversees investigations and records allegations unless conflicted, in which case the Treasurer will assume responsibility. The President will appoint a trustee as lead investigator; if implicated, trustees will decide the lead. All investigations follow BSACI disciplinary procedures and legal requirements.

Results are shared only with those who need to know, protecting reputations and limiting liability. If fraud allegations are unsubstantiated, the reporter is informed. Investigations are

conducted discreetly, impartially, and limited to relevant matters. A written report of findings is prepared upon completion.

11. Post investigation

In the event of fraud, BSACI will implement all necessary changes to systems and procedures to prevent recurrence. Investigations may identify deficiencies in supervision or weaknesses in internal controls; where such issues are found, timely corrective measures will be introduced.

Where appropriate, BSACI may refer cases of significant fraud to the police with a view to initiating criminal proceedings.

If BSACI incurs a financial loss, steps will be taken to recover any benefits or advantages obtained through fraudulent activity, as well as associated costs, from the individuals responsible. Legal advice will be sought as required.

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