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Merħba

Welcome

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Safeguarding your Voluntary Organisation from Abuse

A Supporting Toolkit

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Office of the Commissioner
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Introduction of Participants

- Name & Surname
- Voluntary Organisation

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Introduction: Overview of the Toolkit

Overview of the Toolkit

Introduction:	Why is this guidance relevant to the VO sector? How might VOs be vulnerable?
Chapter 1:	VOs and terrorism
Chapter 2:	VO's due diligence, monitoring and verifying the end use of charitable funds
Chapter 3:	Fraud and financial crime
Chapter 4:	Holding, moving and receiving funds safely
Chapter 5:	Protecting VOs from abuse for extremist purposes

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Introduction to the Toolkit: Why are we here?

- We need to make sure that funds generated by the VOs reach their intended destinations.
- Help safeguard and maintain reputation.
- Help VOs operate within the law.
- Help to continue building correctness, transparency and accountability.

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Why is this guidance relevant to the VO sector? How might VOs be vulnerable?

- This toolkit is designed to give you the knowledge and tools you need to manage risks and protect your VO from abuse such as money laundering, funding of terrorism, and fraud.
- The aim is to help VOs put in place good standards of governance and accountability in place to safeguard themselves from abuse.

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Types of Abuse

- **Fraud** - It involves either false representation, failing to disclose information or abuse of position, undertaken in order to make a gain or cause loss to another.
- **Theft** - Appropriating property belonging to another with the intention of permanently depriving the other of it.
- **Money Laundering** - The process of turning the proceeds of crime into property or money that can be accessed legitimately without arousing suspicion.
- **Terrorist Financing** - The raising, moving, storing and using of financial resources for the purposes of terrorism.

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Why is this toolkit relevant to the VO sector?

- The number of cases of abuse in which there is evidence of sectorial involvement is very small in comparison to the size of the sector.
- However, such abuse is completely unacceptable.
- The impact is potentially significant for public trust and confidence in that organisation and the sector in general.
- The risk of links of abuse does not apply equally across the sector and there is no 'one size fits all' approach.

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How might VOs be vulnerable?

The abuse of VOs for illegal purposes, such as terrorism and money laundering, may take a variety of different forms, including:

- exploiting VO funding;
- abusing VO assets;
- misusing a VO name and status; and
- setting up a VO for an illegal or improper purpose.

It may also include inappropriate expressions of support by an administrator for a proscribed organisation or designated person or entity.

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Chapter 1: VOs and Terrorism

This chapter is designed to help VO administrators familiarise themselves with the legal framework which aims to protect Malta from terrorist abuse and understand how this affects VOs.

It provides advice on what you should do if you discover that your VO may be working with or connected to people or organisations on terrorist lists.

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Chapter 1: VOs and Terrorism "Must" or "Should" do?

Your legal duty:	It's vital that you:
Act in your VO's best interests	Implement realistic and reasonable risk management strategies to identify and mitigate risks to the VO's funds, assets and reputation.
Manage your VO's resources responsibly	Implement effective financial controls, including undertaking appropriate due diligence on partner organisations.
Act with reasonable care and skill	Take appropriate professional advice on matters where there may be material risk to the VO (eg. before entering into a high risk activity such as funding a project in a country where terrorists are known to operate).

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Chapter 1: VOs and Terrorism
Technical Terms

Beneficiary

Statute

Property

Serious Incident

Administrators

Proscribed Organisations

Terrorist Financing

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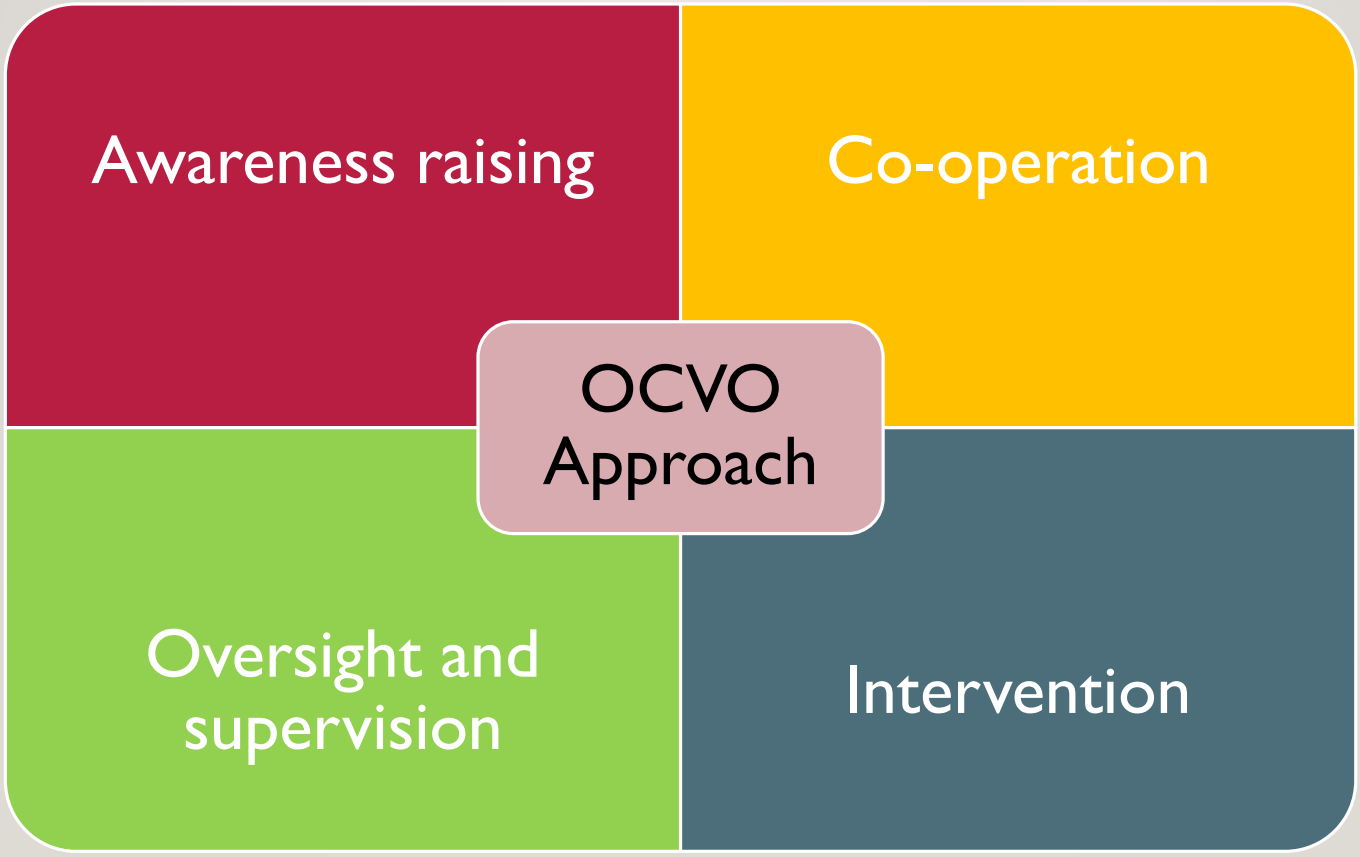
Chapter 1: VOs and Terrorism
Role of the OCVO in counter terrorism strategies



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Chapter 1: VOs and Terrorism
Malta's AML/CFT Strategy

1. Establish a national coordination mechanism
2. Strengthen the supervisory framework
3. Enhance internal capabilities
4. Enhance investigation and prosecution capabilities
5. Establish an effective asset recovery unit
6. Increase transparency of legal entities
7. Build on the existing international cooperation setup

The strategic initiatives will be completed by the end of 2020.

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Chapter 1: VOs and Terrorism
How might a VO be abused for terrorist purposes?

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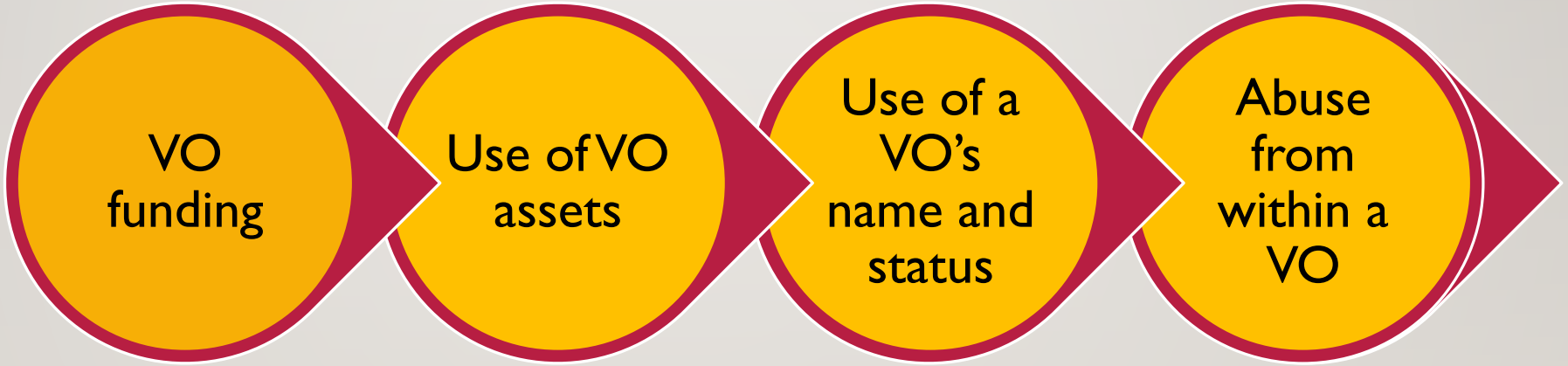
Chapter 1: VOs and Terrorism
How might a VO be abused for terrorist purposes?



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Chapter 1: VOs and Terrorism
Money laundering and Counter-terrorism Legislation

Please refer to the document for an overview of the appropriate legislation

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Chapter 1: VOs and Terrorism
Terrorist Financing

What is terrorist financing?

Terrorist financing is the raising, moving, storing and using of financial resources for the purposes of terrorism.

How might terrorist financing affect VOs?

The financial abuse of VOs by terrorists may take different potential forms:

- Raising funds
- Establishing a VO
- Diversion of funds
- Misuse of donations
- Money laundering
- Transportation of cash

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Chapter 1: VOs and Terrorism
Terrorist Financing

These risks increase if the VO's financial, due diligence and monitoring controls are weak.

It is the administrators' responsibility to assess and manage risks to ensure that a VO is protected from them.

Administrators must take all reasonable steps to minimise the risk that their VO's activities could be misinterpreted as promoting or supporting terrorism including by ensuring they are transparent about their work and rationale behind decisions.

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Chapter 1: VOs and Terrorism
What to report

Incidents which should be reported include:

- your VO (anyone connected with the VO) has known or has alleged links to a proscribed organisation or other terrorist/ unlawful activity or is placed on an international terrorist link;
- VO funds or assets have been used to pay bribes, protection money or ransoms;
- VO funds or assets have been used/ diverted (perhaps via a partner) to support a terrorist group or terrorist activity;
- your VO has been used to circumvent asset freezing measures;
- VO personnel have been harmed by terrorist groups, including if overseas on VO work/ operations
- your VO has been a victim of fraud and/ or money laundering

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Chapter 1: VOs and Terrorism
What to report

Administrators should also be aware of the risks to the VO being abused for extremist purposes; for example:

- when carrying out activities and events involving guest speakers; or
- when promoting literature and educational materials, perhaps via the VO's website and on social media.

By reporting serious incidents promptly you help show that you're discharging your duties and acting responsibly.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds

The aim of this chapter is to make all VO administrators aware of their duties and responsibilities in carrying out due diligence checks and monitoring in relation to the VO's involvement with external bodies and individuals.

Administrators are the custodians of their VOs. They are publicly accountable, and have legal duties and responsibilities under VO law to safeguard their VO, its funds and property.

The best way that administrators can ensure a VO's funds are not abused in the first place is by putting in place good governance and ensuring there is strong financial management, including having robust internal and financial controls and risk management procedures.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds

What are the risks of not having effective due diligence and monitoring?

Most of the time VOs have good relations with their donors, partner organisations and beneficiaries who give to or work with VOs in good faith. However, practical risks do exist and VOs can be abused in a number of ways, for example:

Donors

- Money laundering
- Proceeds of crime
- Tax avoidance/evasion

Beneficiaries

- Know your beneficiaries

Partners

- Know your partners

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
A risk based approach

A risk-based and proportionate approach is important and more appropriate than a 'one-size-fits-all' approach.

Administrators cannot apply a risk based approach randomly.

All VOs must have, as a minimum:

- some form of appropriate internal and financial controls;
- proper and adequate financial records for both the receipt and use of all funds together with audit trails of decisions made;
- records of both domestic and international transactions must be sufficiently detailed to verify that funds have been spent properly as intended and in a manner consistent with the purpose and objectives of the organisation;
- given careful consideration to what due diligence, monitoring and verification of use of funds they need to carry out to meet their legal duties;
- taken reasonable and appropriate steps to know who their beneficiaries are.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds

What do administrators have to do for due diligence?

What administrators need to apply to undertake due diligence can be described as the 'Know your' principles:

- know your donor;
- know your beneficiaries; and
- know your partner

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds

What do administrators have to do for due diligence?

The core elements of due diligence across each of the 'Know your' principles involve administrators taking reasonable steps to ensure they:

- **identify** – know who they are dealing with
- **verify** – where reasonable and the risks are high, verify this
- **know what the organisation's or individual's business is** and can be assured this is appropriate for the VO to be involved with
- **know what their specific business is with the VO** and have confidence they will deliver what the VO wants them to
- **watch out** for unusual or suspicious activities, conduct or requests

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
What do administrators have to do for monitoring and verifying the end use of funds?

Administrators must be able to demonstrate that funds have been used for the proper purposes for which they were intended. This is done through monitoring.

Monitoring will almost always include steps to verify the proper end use of funds. It involves steps aimed at ensuring:

- the VO's funds can be accounted for;
- there is an audit trail showing the expenditure of funds by the partner;
- the funds were received by the partner and if forwarded., there is an audit trail to show this
- the partner has actually delivered the project
- funds have been used for the purposes for which they were intended
- any concerns that need to be dealt with are identified

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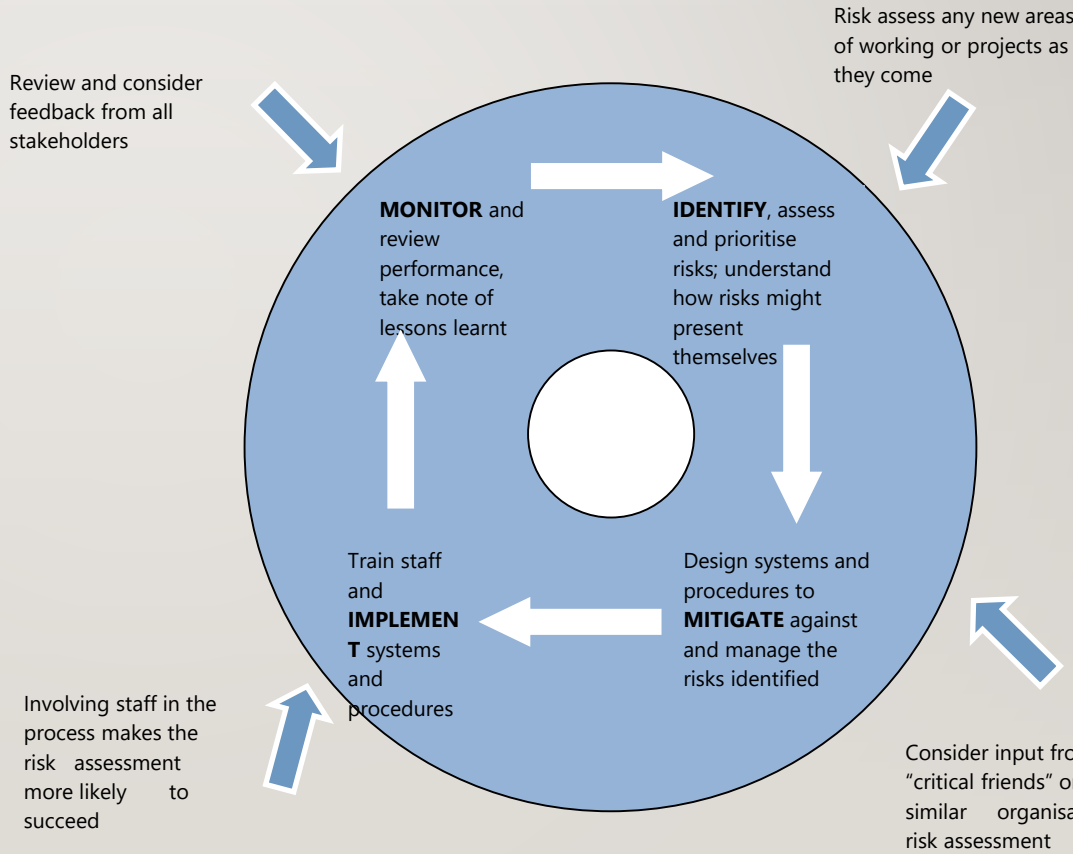
Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 1: Risk Assessment

The risk assessment cycle



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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 2: Risk Management

Strengths, weaknesses, opportunities and threats (SWOT) analysis

Strengths	Weaknesses	Opportunities	Threats
Attributes of the partner, project or activity that will help to achieve the objective or improve the outcome.	Attributes of the partner, project or activity that might cause problems, be harmful to the quality of the outcome, or prevent the objectives from being achieved.	Conditions or resources which could be used to help achieve the objectives, or which could help to improve the outcome.	Events or conditions which could restrict the achievability of the objectives, or which could damage the quality of the outcome.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 3: Risk Management

PESTLE analysis

Political

Factors include tax policy, employment law, reforms and political stability. VOs may need to consider where a government does not want services or goods to be provided.

Economic

Factors include economic growth, interest rates, exchange rates, inflation, wage rates, working hours and cost of living.

Social

Factors include cultural aspects, health and safety consciousness, population growth rate and various demographics.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 3: Risk Management

Technological

Factors include ecological and environmental aspects and available products and services. VOs may need to innovate, having considered the compatibility with their own technologies and whether they are transferable internationally.

Legal

Factors include any law which may impact on the VOs' operations, including NGO regulation and criminal and terrorist legislation which will differ from country to country.

Environmental

Factors include an awareness of climate change or seasonal or terrain variations which may affect VOs' service delivery methods.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 4: Risk Management

Risk Matrix

- Can be used in conjunction with the SWOT and PESTLE analyses.
- Administrators may find this method useful when assessing areas of risk, for example when planning a new project to be carried out with a new partner organisation.
- The identification of appropriate risks may be best undertaken by involving those with a detailed understanding of the VO's operations and work and/or detailed knowledge of the particular operating environment or the nature of particular projects.
- The level of risk should be measured by both the likelihood of something occurring and the severity of impact if it were to happen.
- The risk matrix can subsequently be used as a risk register for ongoing monitoring and review of risk throughout the life of a project. The following is an example of a section of a risk matrix.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 5: Risk Management

Risk Assessment Checklist – things to talk about

The activity/project:

- Is the activity clearly within the VO's objects?
- Are proper policies and procedures in place to prevent beneficiaries being put at risk?
- Are partners/staff/volunteers sufficiently trained to be able to carry out the work?
- What lessons has the VO learnt from its own previous experience, or that of other organisations working in the same area and/or type of activity?

Legal:

- Are there any specific laws and requirements to be aware of in carrying out the activity?
- Are there any local or EU sanctions in force?

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 5: Risk Management

Finance

- What is the VO's financial position and is there enough money available to support the proposed activity?
- Will there be an impact on tax (for example, VAT implications)?
- How will the money get to the project site? Will it go through bank accounts direct to the recipient?
- Will cash couriers be required?

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 5: Risk Management

Partners

- Are partners involved?
- What risks does this pose?
- Have these partners been involved before?
- Will a written agreement be in place?
- What are the risks of the partner not delivering?
- Can money be recovered if necessary?
- What problems might there be?

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable funds
Tool 5: Risk Management

External Factors

- What factors are outside the administrators' direct control?

VOs working internationally should ensure their risk assessment takes account of any relevant circumstances such as:

- internal conflict or other violent or military action
- known terrorist or criminal activity
- poor infrastructure in remote or sparsely populated areas
- changes in government/political environment
- lack of banking facilities
- high levels of bribery and corruption

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund
Tool 6: Know your donors

Know your donor - key questions

These questions are not intended to be asked in respect of each donor. However, administrators may need to consider them depending on the risk, including the size and nature of the donation, and whether it appears to have any suspicious characteristics.

General information

- Who are the donors?
- What is known about them?
- Does the VO have a well-established relationship with them?

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund
Tool 6: Know your donors

The nature of the donation and any conditions

- How big is the donation?
- Is it a single donation, or one of a number of regular donations, or the first of multiple future donations?
- Is the donation one of a series of interest-free loans from sources that cannot be identified or checked by the VO?
- Are there unusual or substantial one-off donations?
- Is there a condition that funds are only to be retained by the VO for a period and then returned to the donor, with the VO retaining the interest?

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund
Tool 6: Know your donors

What administrators should do if they are suspicious?

- If due diligence checks reveal evidence of crime, administrators must report the matter to the police and/or other appropriate authorities.
- If the administrators have reasonable cause to suspect that a donation is related to money laundering and/or terrorist financing, they are to report the matter to the police.
- Such issues should also be reported to the CVO, especially if significant sums of money or other property are donated to the VO from an unknown or unverified source. This could include an unusually large one-off donation or a series of smaller donations from a source you cannot identify or check.
- Check the donor against the lists of financial sanctions targets and proscribed organisations.
- Consider whether to refuse the donation.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund
Tool 7: Know your donor

Suspicious donations log - Information to include:

- Name of donor, amount received and date of receipt
- Form of donation – cash, cheque or bank transfer
- If not a cash donation – name of bank, account number, IBAN, name of cheque signatory
- Nature of suspicion / reason for query
- Any previous donations
- Any conditions attached to the donation
- Action to be taken.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund

Tool 8: Know your partner

Know your partner – key issues to think about

- Key partner details
- Representatives and structures
- Practical working relationship
- Accounting and internal financial controls
- External risk factors

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund

Tool 9: Know your partner

Proposed partner form includes the following:

- Basic Information
- Main Contact
- Administrators
- Senior Management
- Legal Status
- Bank details
- Proposed partnership work
- Assurance
- Examination of accounts
- Partnership agreement

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund

Tool 10: Know your partner

Outline partnership agreement to include:

- Date of Agreement
- Title of agreement / project
- Parties' names and addresses as per a legal document
- Brief overview and duration of project
- Duties of ALL parties involved
- Standard clauses
- Signatures (Including initials on each page)
- Annexes:
  - Implementation document;
  - Budget;
  - ALL reporting requirements;
  - Visiting and reporting schedule
  - Relevant policies.

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund

Tools 11 to 15 refer to Monitoring

- Tool 11: Grant monitoring report – declaration by partner organisations
- Tool 12: Monitoring visit checklist
- Tool 13: Options for on-site inspections
- Tool 14: Monitoring visit log
- Tool 15: Project monitoring checklist

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Chapter 2: VO's due diligence, monitoring and verifying the end use of charitable fund

Tool 16: Due diligence

Identify	→	Know who you are dealing with
Verify	→	Where reasonable, and risks are high, verify identities
Know their business	→	Be assured that it is appropriate for the VO's involvement
Know what their business is with your VO	→	Have confidence that they can deliver
Watch out	→	For unusual activities, conduct or requests

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Chapter 3: Fraud and financial crime

- This chapter aims to highlight some of the types of fraud and financial crime to which VOs are vulnerable and provide some practical advice for administrators on how to tackle it.
- The VO sector is very diverse, and sometimes highly specialised; not every VO will experience any or every type of fraud or crime mentioned.
- However, if administrators have an awareness of fraud and financial crime risks they will be better equipped to recognise them.
- This guidance will also help administrators to devise and implement measures to manage the risks.

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Chapter 3: Fraud and financial crime
Why might VOs be vulnerable to fraud and financial crime?

- Nobody would abuse a VO
- Depend on unsupervised one or two people
- Transfer funds locally or abroad
- May have partners to deliver projects
- Rely on goodwill
- International presence
- Complex financial systems
- Insufficient human resources
- Form a huge, diverse sector
- Unusual income and expenditure
- Work abroad might not be under direct supervision
- Set up as sham organisations

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Chapter 3: Fraud and financial crime
How can administrators manage the risks from criminal financial abuse?

- The risk from financial fraud and abuse can never be completely ruled out. However, proper and adequate internal financial controls play an important part in managing this risk.
- Administrators are responsible for the effective administration of the VO and have a legal duty to safeguard VO assets.
- Funders, donors, supporters and beneficiaries are entitled to expect proper standards of management and financial control.
- If the VO falls victim to financial crime resulting from administrators not putting adequate financial controls in place, then the administrators will have failed to meet their legal duties to the VO.

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Chapter 3: Fraud and financial crime
Other types of Crime

- We have already mentioned Fraud, Theft, Money Laundering and Terrorist Financing.
- **Income-related fraud** - This occurs when people within or connected to a VO attempt to divert funds for personal use or other non-VO purposes.
- **Expenditure-related fraud** – This occurs when people connected to a VO, for example, claim non-existent, over-inflated or inappropriate expenses or withdraw cash directly from the VO's bank account for personal use
- **Property and investment fraud** This occurs through the fraudulent use of VO property - for example personal use of VO vehicles, hiring them out, siphoning off fuel, claiming for overpriced or unnecessary repairs.

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Chapter 3: Fraud and financial crime
Other types of Crime

- **Procurement fraud -** Procurement fraud is a generic term describing fraud relating to the purchase of goods and/or the commissioning of services, as opposed to the simple theft of cash.
- **Fraudulent fundraising in the VO's name -** This usually involves misrepresenting to the public or other donors the destination of funds, or the amount going to a named VO.
- **Fraudulent invoicing and grant applications**
- **Identity fraud/theft**
- **Banking fraud -** A major risk under bank fraud is fraudulently setting up direct debits and standing orders to transfer funds to the fraudster's own bank account.

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Chapter 3: Fraud and financial crime Implementing controls

- Financial Controls

Administrators must ensure that their VO has financial and banking procedures in place which are appropriate to their VO and its activities and are fit for purpose.

Internal financial controls are essential checks and procedures that help VO administrators to:

- meet their legal duties to safeguard the VO's assets;
- administer the VO's finances and assets in a way that identifies and manages risk;
- ensure the quality of financial reporting, by keeping adequate accounting records and preparing timely and relevant financial information.

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Chapter 3: Fraud and financial crime
Implementing controls

- Human resources and recruitment

For those VOs that have staff or volunteers, effective fraud prevention starts with robust HR policies and procedures.

For smaller VOs this might mean nothing more than checking references for new staff and ensuring that they are aware of the financial controls in place.

For larger VOs with more staff and greater levels of income and expenditure, a more comprehensive recruitment and selection process will be appropriate.

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Chapter 3: Fraud and financial crime Implementing controls

The following measures may be helpful when reinforcing HR procedures:

- a self-declaration form for staff to confirm that they do not have an unspent conviction for fraud, theft or other relevant offence (as a minimum for smaller VOs, or a police conduct certificate)
- performing a credit check or screening on employees and volunteers who are handling finances or dealing with cash – employees or volunteers must be informed they will be subject to screening and have signed a consent form and data protection statement
- checking the references of previous employers when recruiting
- setting out the VO's policies and procedures covering anti-money laundering, fraud and reporting requirements (including whistleblowing) as part of a staff and administrator handbook
- assessing staff and administrator awareness of VO policies and procedures as part of the performance appraisal and review process

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Chapter 3: Fraud and financial crime
Practical advice on dealing with money laundering

It is important that administrators take reasonable steps to prevent the VO being used for money laundering purposes and know what to do if they have any suspicions.

To help prevent money laundering, VOs should assess the levels of risk to which they are exposed and adopt appropriate anti-money laundering procedures. These might include:

- Due diligence on donors
- Proper recording of donations and grants
- Staff well informed and able to recognise signs of money laundering
- Monitoring of the effectiveness of money laundering procedures

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Chapter 3: Fraud and financial crime
What are the warning signs for money laundering?

The following situations should be considered critically as possible indications of money laundering, especially if more than one of them occurs or they occur regularly.

- large unexpected donations from unknown individuals, organisations or other sources new to the administrators;
- donations on condition that particular individuals or organisations, who are unfamiliar to the VO, being engaged to carry out the work;
- money being offered as a loan to the VO for a period of time after which it is to be returned or sent elsewhere;
- similar 'loan' arrangements in which money is received by the VO in a foreign currency but is to be returned to the donor in Euro;

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Chapter 3: Fraud and financial crime
What are the warning signs for money laundering?

- unexpected or unexplained requests for the repayment of all or part of a donation;
- requests for assistance in recovering large sums of money where the VO is offered a percentage of the amount recovered through the use of the VO's bank account or allow the donor to use its name or letterheads on the pretext that it is a necessary part of the recovery process;
- unsolicited offers of short term loans of large cash amounts, repayable by cheque or bank transfer, perhaps in a different currency;
- being asked to allow transactions to pass through the VO's bank account;
- offers of goods or services which seem very expensive, unusual or carry high administration and other charges.

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Chapter 3: Fraud and financial crime
Fraud action and response plan

Why should a VO have a fraud action and response plan?

- If administrators and staff are aware of what to do if a fraud occurs or is suspected, they have a much better chance of reducing any potential negative impact. A fraud action and response plan can help with this and can also act as a deterrent to fraud in the first place. For very small VOs, such a plan may not be necessary. For others, a fraud action and response plan can be a relatively simple set of procedures; administrators of larger VOs with a wider range of activities or more complex operations are likely to need a plan and for it to be more comprehensive.
- As well as the obvious financial impact of fraud it is important not to underestimate the emotional impact of being a victim. If a VO has an action plan in place, which addresses both aspects, administrators and staff will be in a much better position to deal with the full impact and consequences of fraud.

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Chapter 3: Fraud and financial crime
Reporting fraud and money laundering

When should a report be made to the police?

- If administrators suspect a crime has been committed or the VO's money or help is being used for illegal purposes, they must report their concerns and the suspicious activities to the police and appropriate authorities as soon as possible.

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Chapter 4: Holding, moving and receiving funds safely

- This chapter explains the need for VOs to have and use bank accounts; what administrators' duties are when using the banking system; and the particular issues which may arise in connection with exchanging currencies.
- This chapter provides a number of practical Tools that administrators can use to help manage the risks and protect their VO's funds from harm.

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Chapter 5: Protecting VOs from abuse for extremist purposes

VO administrators and managers need to be aware of, and actively manage, activities which give rise to the risks that speakers or literature may:

- break the law, by, for example, inciting hate speech;
- encourage or glorify terrorism;
- incite racial or religious hatred;
- incite criminal acts or public order offences
- be outside of the VO's objects;
- put the VO's reputation or other assets at risk;
- be otherwise inappropriate under VO law,

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Chapter 5: Protecting VOs from abuse for extremist purposes What do administrators need to do?

The risks vary from one organisation to another. The higher the risks the more needs to be done. Administrators need to be vigilant and should put in appropriate measures in place, such as to:

- assess the risks in connection with the proposed event, meeting or publication, including those undertaken by partner organisations;
- ensure they know enough about proposed speakers and close partners;
- be clear about how speakers, partners, sponsors and publications are selected and approved;
- provide clear guidelines for speakers, authors, translators and editors;

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Chapter 5: Protecting VOs from abuse for extremist purposes What do administrators need to do?

- take steps to ensure proposed partner organisations and speakers are suitable;
- properly manage VO events to prevent inappropriate activities taking place and, if those steps do not work, to deal with them promptly;
- satisfy themselves that literature distributed by or made available by the VO does not break the law, is consistent with its purposes and does not place the VO or its assets at undue risk of harm;
- take steps to prevent the VO's activities and views from being misinterpreted;
- set procedures for responding to complaints and concerns.

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Conclusion

It is up to the each Voluntary Organisation to choose whether to use this toolkit.

Money laundering and financing for terrorism might sound as situations farfetched, but, you, administrators, staff and volunteers, must be aware that you may be surrounded by people whose interests and aims are not as noble as they seem. It is up to you!

Any Questions?

Thank you for your attention!