



Equipping women, children and families
in India to discover a brighter future.

Friends of Calcutta Cathedral Relief Service (“the Charity”)

Financial Crime Policy and Procedures

Charity Commission No: 2663022

Inland Revenue No XN33280

- Purpose:** The Friends of CRS (“the Charity”) is a UK registered charity, the purpose of which is to further the work of the Calcutta Cathedral Relief Service (‘CCRS’) amongst the destitute and needy of the city of Kolkata in West Bengal or in other states where the CCRS is engaged, either through itself or one or more of CCRS’s collaborative partners.
- Commitment:** In carrying out its activities, the Charity is committed to the prevention of financial crime, in particular by (a) not facilitating money laundering, and (b) not breaching international financial sanctions.
- Definitions:** Money laundering is the conversion of illegal funds obtained from criminal activities into other assets in such a way as to conceal their true origin so that it appears the money has come from a legitimate or lawful source. Financial sanctions are imposed by the United Nations, European Union, United Kingdom and other countries. Financial sanctions target individuals, organisations and in some instances whole countries by restricting access to funds, economic resources, and financial services and markets.
- Receipt of Funds:** The Charity receives income from investments and from donations. Its investments are managed by Rathbones Financial Management on a discretionary basis, and the Charity is reliant on Rathbones’ safeguards in that respect. Donations are received from a variety of sources, mainly individuals, but also churches and other institutions, most of whom are known and trusted sources. Nearly all donations are received from donors in the United Kingdom, but on occasion a donation is received from an overseas source which is known to the Trustees of the Charity. Some donations are received through the Just Giving platform, and the Charity is reliant of the safeguards maintained by Just Giving in respect of those donations.
- The Trustees of the Charity will use due diligence to ensure that all money received on behalf of the Charity comes from a trusted source, and in the event that the origin of any such money is suspected of being tainted with dishonesty or illegality, the payment will be rejected.

6. **Transmission of Funds:** The Charity maintains accounts with registered banks in the United Kingdom and only makes payments through those banks. Most funds paid by the Charity are sent to CCRS in Kolkata and a strict protocol is followed for such payments, namely (a) CCRS sends the Charity a requisition for funds showing the purposes for which they are needed; (b) the requisition is approved by at least two of the Trustees; (c) the funds are sent to an account in the name of CCRS at the Central Bank of India in accordance with the licence which CCRS holds from the Government of India for the receipt of such funds. In the event that the Charity is asked to make payment to any other entity outside the United Kingdom, such payment will only be made with the agreement of the Trustees, and after satisfactory enquiries as to the legitimacy of the payee, and the purpose of the payment.
7. The only payments made by the Charity in the United Kingdom are in respect of liabilities incurred in the ordinary course of its activities.
8. **Recipients of Funds:** As the purpose of the Charity is to support the work of CCRS, the latter is the principal recipient of funds from the Charity. CCRS is registered as a “Society” under the laws of West Bengal and has its own written constitution. The Society has a membership limited to sixteen people of which three (the Bishop, the Presbyter (or Dean) of St Paul’s Cathedral (Calcutta) and the Director of CCRS) are ex officio members. The remaining members are either appointed or elected by the members of the Society in General Meeting. Trustees maintain frequent and regular contact with the Director of CCRS and with members of its Executive Committee.
9. Nari Dana is a social enterprise operating under the auspices of CCRS and is registered as a separate company. Some funds sent to CCRS are for the use of Nari Dana in order to support the business of the social enterprise.
10. **Use of Funds:** Requisitions for funds sent by CCRS to the Charity set out the purpose of for which the funds are needed. CCRS maintains detailed accounts and its accounts are audited. Financial reports are sent regularly to the Charity by CCRS. Trustees visit CCRS in Kolkata as often as practicable, and use these visits to monitor how funds are being used. CCRS frequently works with local partners on particular projects, and the Charity is reliant on CCRS to monitoring how any financial resources for such projects are spent.
11. While the Treasurer and General Secretary of the Charity are principally responsible for ensuring compliance with this Policy, all the Trustees have a duty to fulfil the commitment in paragraph 2 above, and in particular to raise concerns about any payments received or made, or use of any funds, which they consider may be in breach of that commitment.

Adopted: 26 July 2023