



Pro Touch Soccer Academy CIC

270-276 York Way, London, N7 9PQ

Email: info@protouchsocceracademy.com | Website:

www.protouchsocceracademy.com

Money Laundering & Terrorist Financing Prevention Policy

Prepared for: Pro Touch Soccer Academy — Director of Operations: Mus Turay

Date: 6 November 2025

Review date: 6 November 2026 (or sooner if legislation/risks change)

Purpose and scope

This policy sets out Pro Touch Soccer Academy's approach to preventing money laundering and terrorist financing, ensuring compliance with the UK Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) and related guidance. It applies to all trustees, directors, employees, contractors, volunteers and any third parties acting on behalf of the Academy.

2. Statement of commitment

Pro Touch Soccer Academy is committed to:

Preventing its services, funds and reputation from being used to launder criminal proceeds or finance terrorism.

Applying a risk-based approach, carrying out proportionate checks and record-keeping, and reporting suspicions to the National Crime Agency (NCA) where required

3. Legal and regulatory background

Key legal obligations include:

- The Money Laundering Regulations 2017 (as amended), setting duties to identify, assess and mitigate money-laundering and terrorist financing risk, keep records and report suspicious activity.

- Relevant sector guidance, such as that issued by the JMLSG, HM Government and the NCA, on applying a proportionate, risk-based approach.

4. Roles & responsibilities

Board of Trustees / Directors

- Hold overall responsibility for compliance and for ensuring adequate resources and oversight.

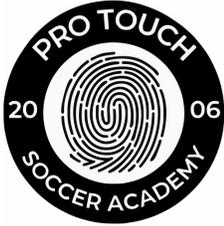
Money Laundering Reporting Officer (MLRO) / Nominated Officer

- Appointed MLRO: Chris Franco (info@protouchsocceracademy.co.uk / 0749544014).

- Responsibilities: receiving internal reports, assessing suspicions, deciding whether to submit a Suspicious Activity Report (SAR) to the NCA, and maintaining records.

All staff, volunteers and contractors

- Must complete AML training, apply due diligence where relevant, and report any



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suspicious immediately to the MLRO.

5. Risk assessment

Pro Touch Soccer Academy maintains a written risk assessment covering:

- Services and activities (e.g., sports programmes, mentoring, sponsorships).
- Types of funds received (cash, bank transfers, grants, donations, sponsorship).
- Donor and partner profiles.
- Delivery methods and third-party involvement.

Controls are proportionate to risk levels — enhanced due diligence applies for higher-risk situations.

6. Customer / donor / partner due diligence (CDD)

CDD will be applied where the Academy:

- Receives large or unusual payments.
- Enters a sponsorship, partnership, or funding arrangement.

Standard CDD:

Obtain and record the payer's or partner's name, address, registration number (if applicable), and contact details.

- Confirm identity or organisation status where appropriate.

Enhanced CDD:

- Required when the transaction or donor is from a higher-risk country, involves a politically exposed person (PEP), or appears inconsistent with the Academy's normal activities.

- Obtain additional documents, explanations of source of funds, and escalate to the MLRO.

7. Suspicious activity reporting

Internal reporting:

- Staff must report suspicions immediately to the MLRO using the internal report form.

MLRO responsibilities:

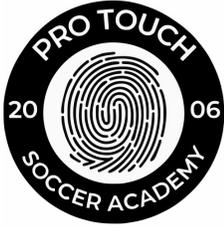
- Review the report, assess evidence, and decide whether to submit a SAR to the NCA.
- Keep full written records of all reports and decisions.
- Avoid "tipping off" the subject of the report.

8. Record keeping

The Academy will retain:

- Identification and verification records.
- Suspicion reports, SARs, and correspondence with the NCA.
- AML training records.

Records will be kept securely for at least five years from the end of the relationship or transaction.



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9. Training & awareness

All staff and volunteers receive AML training at induction and annually thereafter, covering:

- Recognising suspicious activity.
- Internal reporting procedures.
- Prohibitions on tipping off.
- The role of the MLRO.

10. Policy review

This policy will be reviewed annually or sooner if laws or organisational activities change. The Board will receive an annual AML assurance report from the MLRO.

11. Examples of suspicious activity

Staff should report to the MLRO if they observe:

- A donor or sponsor requesting to pay in cash for a large amount.
- A partner refusing to provide standard business information.
- Transactions inconsistent with known business relationships.
- Funds coming from unusual or overseas accounts without clear justification.

12. Appendices (to be developed)

- Appendix A: Internal Suspicion Report Form
- Appendix B: CDD Checklist and Accepted ID List
- Appendix C: MLRO Contact Details
- Appendix D: AML Training Log

13. Contact

Money Laundering Reporting Officer: Chris Franco – Director
info@protouchsocceracademy.co.uk 0749544014