KARAMOJA TUMAINI NETWORK · KTN

Anti-Terrorism, Sanctions and Anti-Money Laundering

Making sure KTN's money reaches children, and nobody else

Policy Category Governance Policy · Classification: Public

Adopted by the Board of Directors July 2026

Status Version 1.0 · Effective July 2026 · Next review July 2028

A KARAMOJONG-LED CHILD PROTECTION ORGANISATION · KAMPALA & NAPAK, UGANDA

OUR COMMITMENT

Karamoja Tumaini Network does not knowingly provide funds, goods, services, employment or any other benefit, directly or indirectly, to any individual or entity subject to counter-terrorism or international sanctions measures, and does not accept funds from any such source.

KTN screens the people and organisations it pays, employs, engages or takes money from, keeps a dated record of having done so, and stops any transaction where a possible match arises until the matter is resolved. Where KTN cannot satisfy itself, it declines. No funding opportunity and no operational convenience overrides this.

WHY IT MATTERS

KTN works with children who were trafficked, sold and moved by people who profit from them, along a corridor that runs to an international border, in a sub-region where cash is the ordinary means of exchange. That is precisely the profile these rules exist to address, and KTN accepts it without defensiveness. Money that leaks to a trafficking network does not go missing: it pays for harm to the children this organisation exists to protect. That is a safeguarding matter first.

WHERE IT APPLIES

Every person KTN pays, employs or governs through, every organisation it pays, and every source it takes money from. Every transaction in which KTN receives, holds, transfers or disburses value, in cash, by bank transfer, by mobile money or in kind. Children and families receiving protection services are never screened.

HOPE · HEAL · EMPOWER

Every shilling that enters and leaves has a name behind it, and KTN answers for both.

ANTI-TERRORISM, SANCTIONS AND ANTI-MONEY LAUNDERING POLICY · KARAMOJA TUMAINI NETWORK

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List of Tables

List of Figures

This policy contains no numbered figures. Its process content is carried in the tables listed above, chiefly the screening requirements at Table 3, the screening method at Table 6, the possible-match procedure at Table 7 and the risk register at Table 8.

Policy Approval

This Anti-Terrorism, Sanctions and Anti-Money Laundering Policy was considered and approved by the Board of Directors of Karamoja Tumaini Network in July 2026 and takes effect from that date as a governance instrument of the organisation. Compliance with it is mandatory for everyone within the scope set out in Chapter 2.

Field	Detail
Policy status	Approved
Approval authority	Board of Directors
Approval date	July 2026
Effective date	July 2026
Version	1.0
Board resolution reference	KTN/BRD/RES/2026/______

The Board Secretary enters the resolution number from the minutes of the approving meeting before the signed copy is filed.

APPROVAL SIGNATURES

Chairperson, Board of Directors

Karamoja Tumaini Network · July 2026

A Statement of Commitment from the Board

This Board adopted this policy before KTN holds the institutional funding that will require it, and it did so deliberately. The controls are far easier to build into a small organisation than to retrofit into a growing one, and a funder is entitled to see them working before it commits anything.

We are honest about what KTN can operate today. There is no commercial screening subscription and no separate Screening Officer. There are free public lists, a manual search, a dated record of every check, and a quarterly independent sample by the Finance and Audit Sub-Committee. We would rather state that plainly than describe a system KTN does not have. What we will not accept is a check that was not recorded, or a payment that went ahead because someone was in a hurry.

One line runs through the whole of this policy and the Board wants it read first: getting a child to safety never waits for a search. Where an urgent protective payment must be made, it is made, screened immediately afterwards, and the reason recorded. Everywhere else, the transaction stops until the question is answered, however senior the person asking.

Chairperson, Board of Directors

Karamoja Tumaini Network

Adopted by resolution of the Board of Directors, July 2026.

Document Control

Field	Detail
Policy title	Anti-Terrorism, Sanctions and Anti-Money Laundering Policy
Registered name	Karamoja Tumaini Network Limited, a company limited by guarantee without share capital, Reg. No. 80034272074698, incorporated on 1 July 2025 under the Companies Act; permitted to operate as a Non-Governmental Organisation by the National Bureau for Non-Governmental Organisations under permit number INDP000745-NB, file number MIA/NB/2026/06/7454
Version	1.0
Status	Approved and adopted by the Board of Directors
Approval date	July 2026
Effective date	July 2026
Policy owner	Karamoja Tumaini Network, acting through its Board of Directors
Policy custodian	The Executive Director, supported by the finance function, who together act as the Screening Officer until a separate post exists
Applies to	All board members, staff, volunteers, peer educators, interns, consultants, contractors and their personnel, partner organisations, suppliers and any person or body that receives or handles KTN funds
Related documents	The Finance and Anti-Fraud Policy; the Procurement and Asset Management Policy; the Resource Mobilisation and Sustainability Strategy; the Conflict of Interest Policy; the Whistleblowing and Protected Disclosure Policy; the Board Charter and Governance Handbook
Review frequency	Every two years, or earlier where required by a change in law, a donor requirement, organisational change, a serious incident, or an audit or evaluation finding (Chapter 9)
Next scheduled review	July 2028

Version Control Register

Version	Date	Description of change	Approved by
1.0	July 2026	First edition.	Board of Directors

Amendment History Register

No.	Date	Section(s) affected	Summary and approval reference
1	16 August 2026	Front matter; Contents; new 8.2; Table 6; table numbering	Full front matter added, including this register, a Statement of Commitment from the Board, the Distribution List, Acronyms and Abbreviations, and an Executive Summary. Contents rebuilt as a live field carrying sub-headings. New Section 8.2, Records, Audit Trail and Retention. Circular cross-reference in Table 6 corrected from Chapter 6 to Section 6.2. Tables renumbered and a List of Tables added. Issued under the approval recorded on the Policy Approval page.

Distribution List

Recipient	Format	Date issued
Board of Directors	Electronic copy and one signed paper copy	July 2026
Executive Director and the finance function	Electronic copy, and the working annexes	July 2026
All staff, volunteers, peer educators and interns	Electronic copy, and briefing at induction	July 2026
Partners, sub-grantees, suppliers and consultants	The Annex C clause in the agreement	On engagement
Institutional donors and regulators on request	Electronic copy	On request
Both offices	One paper copy at Kampala and one at Napak	July 2026

The policy custodian keeps this list current. The authoritative version of this policy is the electronic copy held by the custodian; printed copies are uncontrolled once issued.

Contact Information

KTN does not yet operate a dedicated telephone line. Contact is by email to the role addresses below, or in person at either office. Addresses are held by role and not by named person, so a change of staff never closes a route.

Field	Detail
Policy custodian	The Executive Director, supported by the finance function, who together act as the Screening Officer until a separate post exists
General enquiries	info@karamojatumaini.org
Safeguarding concerns	safeguarding@karamojatumaini.org
Whistleblowing and concerns about a senior person	report@karamojatumaini.org
Kampala office	Da Joy House, Room JS05A, Waliggo Road, Komamboga, P.O. Box 10066, Kampala
Napak office	C/o Matany Trading Centre, Matany Town Council, Napak District
Website	www.karamojatumaini.org

Acronyms and Abbreviations

Acronym	Meaning
AML	Anti-Money Laundering
AT-nnn	Requirement reference used in Chapter 4 of this policy
CFT	Combating the Financing of Terrorism
ED	Executive Director
EU	European Union
FASC	Finance and Audit Sub-Committee of the Board
FATF	Financial Action Task Force
FCDO	Foreign, Commonwealth and Development Office of the United Kingdom
KTN	Karamoja Tumaini Network Limited
KYC	Know Your Customer, the identity checks applied before a relationship begins
LC1	Local Council One, the lowest tier of local administration in Uganda
NGO	Non-Governmental Organisation
UGX	Uganda Shilling
UN	United Nations
UNSC	United Nations Security Council
USAID	United States Agency for International Development

Key terms used in this policy are defined in Section 2.3.

Executive Summary

This is Karamoja Tumaini Network's authoritative framework for keeping its money away from designated persons and criminal networks. KTN screens the people and organisations it pays, employs, engages or takes money from, records every check, and stops any transaction where a possible match arises until it is resolved.

The policy does five things. First, it sets the binding rules at Chapter 4: who is screened and when, what evidence is kept, how cash and donations are handled, and what KTN will never do. Second, it sets out at Chapter 6 the method a small organisation can actually operate, using the United Nations Security Council Consolidated List as the baseline and adding whatever a funding agreement requires. Third, it protects the innocent: a resemblance between a common Karamojong name and a listed one is not evidence, and the possible-match procedure exists as much to resolve that fairly as to protect KTN. Fourth, it names who is accountable and admits the concentration of duties in the Executive Director and the finance function, with quarterly independent sampling as the compensating control. Fifth, it binds partners and suppliers through the clause at Annex C.

Two boundaries are stated deliberately. Children and families receiving protection services are not screened; where cash or material support passes to an adult caregiver, the control is identity verification and receipting, not list screening. And screening never delays getting a child to safety: an urgent protective payment is made first and screened immediately afterwards, with the reason recorded.

The policy is honest about two open items. KTN has asked its legal adviser to confirm which statutory obligations apply to an organisation of its type and size, including whether KTN is an accountable person for anti-money-laundering purposes, and Chapter 3 will be updated when that advice arrives. The monetary thresholds this policy refers to are set by Board resolution in the schedule of limits and reviewed annually with the budget.

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CHAPTER ONE

INTRODUCTION

Why this policy exists and the risk it addresses.

1 Introduction

Why this policy exists and the risk it addresses.

1.1 Introduction and Organisational Context

Karamoja Tumaini Network works with children who have been trafficked, sold, and moved across districts and borders by people who profit from them. The organisation therefore operates in proximity to criminal networks by the nature of its mission, not by accident. It works along a corridor that runs to an international border, in a sub-region where cash is the normal means of exchange and formal identification is not universal.

That combination is exactly the profile that anti-terrorism and anti-money-laundering requirements exist to address. KTN accepts this without defensiveness. An organisation that moves money into a border region to help children escape exploitation must be able to show that its money does not reach the people doing the exploiting.

KTN holds no major institutional funding at the date of this policy. It is adopting this policy before it receives such funding rather than after, because the controls are easier to build into a small organisation than to retrofit into a growing one, and because a funder is entitled to see them in place before it commits.

1.2 Why This Policy Exists

Three reasons, in order of weight.

Children. Funds that leak to a trafficking network do not merely waste money; they finance harm to the children KTN exists to protect. This is a safeguarding matter before it is a financial one.

The law. Uganda has legislation on anti-money laundering, on the prevention of terrorism, and on trafficking in persons. KTN complies with the law of Uganda in full.

Access to funding. The European Union, FCDO, USAID, United Nations agencies and most international foundations require a written screening commitment before they release funds. Without this policy KTN cannot pass their due diligence, whatever the quality of its programme work.

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CHAPTER TWO

PURPOSE, OBJECTIVES AND SCOPE

What the policy commits KTN to, who it binds and where it applies.

2 Purpose, Objectives and Scope

What the policy commits KTN to, who it binds and where it applies.

2.1 Purpose

POLICY STATEMENT

KTN does not knowingly provide funds, goods, services, employment or any other benefit, directly or indirectly, to any individual or entity subject to counter-terrorism or international sanctions measures, and does not accept funds from any such source.

KTN screens the people and organisations it pays, employs, engages or takes money from, keeps a record of having done so, and stops any transaction where a possible match arises until the matter is resolved. Where KTN cannot satisfy itself, it declines. No funding opportunity and no operational convenience overrides this.

This policy exists to make that statement operable at KTN's current size, with the people and tools it actually has.

2.2 Scope

This policy applies to every person and body listed in the Document Control table, and to every transaction in which KTN receives, holds, transfers or disburses value, whether in cash, by bank transfer, by mobile money, or in kind. It applies to KTN's work in Uganda and to any future engagement outside Uganda.

In scope	What it covers
People KTN pays	Staff, volunteers, peer educators, interns, consultants and contractors
People KTN governs through	Board members and members of the General Assembly
Organisations KTN pays	Suppliers, service providers, partners and any sub-grantee
Sources KTN takes money from	Institutional donors, foundations, corporates, individual donors above the threshold, and in-kind givers
Beneficiary support	Cash or material support passing to a family or caregiver as part of reintegration

Table 1. What this policy covers.

Children and families receiving protection services are not screened. Screening a child would be both unlawful in spirit and contrary to the purpose of the work. Where cash or material support passes to an adult caregiver, the control is the verification and record-keeping at Chapter 6, not list screening.

2.3 Definitions

Term	Meaning
Sanctions	Restrictive measures imposed by the United Nations Security Council or by a state or bloc, prohibiting dealings with named individuals and entities.
Designated person	An individual or entity named on a sanctions or counter-terrorism list.
Screening	Checking a name against those lists before a relationship begins or a payment is made, and recording the check.
Possible match	A result that resembles a designated person closely enough that it cannot be dismissed without further check.
Money laundering	Handling the proceeds of crime so as to disguise their origin.
Terrorism financing	Providing or collecting funds intending or knowing they may be used for terrorism.
Beneficial owner	The natural person who ultimately owns or controls an organisation, as distinct from its registered directors.

Table 2. Definitions used in this policy.

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CHAPTER THREE

GOVERNANCE FRAMEWORK

The law, the principles and the structures through which KTN manages this risk.

3 Governance Framework

The law, the principles and the structures through which KTN manages this risk.

3.1 Legal and Standards Framework

KTN complies with Ugandan law on anti-money laundering, the prevention of terrorism, and trafficking in persons, and with the reporting obligations those laws place on it. KTN has asked its legal adviser to confirm which specific obligations apply to an organisation of its type and size, including whether KTN is an accountable person for the purposes of the anti-money-laundering regime and what that would require. This chapter will be updated when that advice is received, and this policy states the position openly rather than asserting a compliance status KTN has not verified.

Internationally, KTN screens against the United Nations Security Council Consolidated List as its baseline, and against the lists of the United States, the United Kingdom and the European Union where a funding agreement requires it. KTN follows the direction of the Financial Action Task Force recommendations as they apply to non-profit organisations, and in particular the principle that measures should be proportionate to the risk a particular organisation presents rather than applied uniformly to the whole sector.

3.2 Principles

Children before compliance, and both together. Screening never delays getting a child to safety. Where an urgent protective payment must be made, it is made and screened immediately afterwards, with the reason recorded.

Proportionate to risk. Depth of checking rises with the amount, the counterparty and the context. A stationery supplier is not assessed like a sub-grantee.

Documented, not remembered. A check that is not recorded did not happen. Every screening leaves a dated record.

No exceptions for convenience. A transaction stops on a possible match, however urgent or however senior the person asking.

Honest about capacity. KTN uses free public sources and manual records because that is what it can sustain. It says so rather than implying a screening system it does not have.

Do no harm to the innocent. A common Karamojong name resembling a listed name is not evidence of anything. Matches are resolved carefully and a person is never denied work or support on a resemblance alone.

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CHAPTER FOUR

POLICY REQUIREMENTS

The binding rules on screening, cash, funding sources and prohibited dealings.

4 Policy Requirements

The binding rules on screening, cash, funding sources and prohibited dealings.

4.1 Screening Requirements

Ref	Requirement
AT-001	Every prospective board member, member of staff, volunteer, peer educator, intern, consultant and contractor shall be screened against the United Nations Consolidated List before engagement, and the check recorded on the personnel file.
AT-002	Every supplier, partner or payee engaged above the low-value procurement band shall be screened before first payment, regardless of the funding source, and re-screened annually while the relationship continues.
AT-003	Every institutional donor, foundation, corporate donor and any individual or in-kind gift above the threshold set by the Board shall be screened before the funds or goods are accepted.
AT-004	For any partner, sub-grantee or supplier engaged above the medium-value band, KTN shall record the beneficial owners, meaning the natural persons who ultimately own or control the organisation, confirmed in writing by that organisation.
AT-005	Screening shall be evidenced by a dated printout or screenshot of the search result, saved to the relationship file, and by an entry in the screening register.
AT-006	Where a possible match arises, the transaction or engagement shall stop immediately and shall not resume until resolved under Chapter 6. No person may authorise it to proceed in the meantime.

Table 3. Screening requirements.

4.2 Money, Cash and Funding Sources

Ref	Requirement
AT-007	KTN shall not accept a donation from a source it cannot identify. An anonymous donation above the threshold set by the Board shall be declined and, where it cannot be returned, held unspent and reported to the Board.
AT-008	KTN shall not accept cash where the amount or the circumstances give rise to concern about its origin, and shall not accept any donation offered on condition that its source is not recorded.
AT-009	Payments shall be made to a bank account or registered mobile money wallet in the verified name of the payee. KTN shall not pay a third party on a payee's instruction without written authority and a recorded reason.
AT-010	KTN shall not make any payment to, or accept any payment from, a jurisdiction or counterparty that a funding agreement prohibits.
AT-011	Cash disbursed in the field shall be receipted against the named recipient, whose identity is verified by national identification, an LC1 letter, or recognition by the case worker who knows the person, with the method used recorded.

Table 4. Requirements on money and its sources.

4.3 Prohibited Dealings

ABSOLUTE PROHIBITIONS

KTN shall not provide funds, goods, services, training, employment, premises or any other support to a designated person or entity.

KTN shall not enter into any arrangement designed to disguise the source, ownership or destination of funds.

KTN shall not make a payment it does not understand, to a person it cannot identify, for a purpose it cannot document.

No member of personnel shall structure a payment to avoid a threshold in this policy or in the Finance and Anti-Fraud Policy. Doing so is gross misconduct.

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CHAPTER FIVE

ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES

Who screens, who decides and who is accountable.

5 Roles, Responsibilities and Accountabilities

Who screens, who decides and who is accountable.

5.1 Roles and Responsibilities

Who	Responsibility
Board of Directors	Owns this policy. Sets the thresholds. Receives the annual compliance report and any possible match that is not resolved as a false positive.
Finance and Audit Sub-Committee	Reviews the screening register quarterly, samples the evidence, and reports to the Board.
Executive Director	Accountable for implementation. Acts as Screening Officer with the finance function until a separate post exists. Decides whether a possible match is a false positive, on recorded reasons.
Finance function	Performs screening, keeps the register and the evidence, and stops any payment where screening is incomplete.
Everyone else	Provides the information screening requires, and does not proceed with an engagement or payment that has not been screened.

Table 5. Who does what.

KTN is small enough today that the Executive Director and the finance function carry this between them. That concentration is recognised: the compensating control is the quarterly review by the Finance and Audit Sub-Committee, which is independent of both and which samples the evidence rather than relying on assurance. A separate Screening Officer will be appointed when staffing allows, and the trigger is recorded in Chapter 9.

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CHAPTER SIX

PROCEDURES AND OPERATIONAL REQUIREMENTS

How screening is actually done, what happens on a possible match, and how records are kept.

6 Procedures and Operational Requirements

How screening is actually done, what happens on a possible match, and how records are kept.

6.1 How Screening Is Done

KTN uses free, publicly available sources. It does not hold a commercial screening subscription and does not claim to. The method below is what a small organisation can operate reliably, and reliability matters more than sophistication.

Step	What happens
1. Collect	Full legal name, and for an organisation the registration number and the names of directors and beneficial owners.
2. Search	Search the United Nations Security Council Consolidated List, and any further list a funding agreement requires, using the name and any known aliases.
3. Record	Save a dated printout or screenshot of the result to the relationship file and enter it in the screening register at Annex A, whether or not anything was found.
4. Decide	No match, proceed. Possible match, stop and escalate under Section 6.2.
5. Refresh	Re-screen continuing relationships annually, and immediately on becoming aware of anything that changes the risk.

Table 6. The screening method.

6.2 When a Possible Match Arises

A possible match is not an accusation. Names recur, and Karamojong naming conventions mean that resemblance is unremarkable. The purpose of this procedure is to resolve the question properly and to protect the person from an unfair outcome as much as to protect KTN.

Step	Action	Who	When
Stop	Halt the transaction or engagement. Do not tell the person they are being checked against a terrorism list.	Whoever finds it	Immediately
Escalate	Report to the Executive Director in writing.	Finance function	Same day
Compare	Compare date of birth, nationality, place and any identifier against the listing.	Executive Director	Within 2 working days
Decide	Record the decision and the reasons in the register. A false positive is documented, not merely dismissed.	Executive Director	Within 3 working days
Report	Where the match is not resolved as a false positive, inform the Board Chairperson, take legal advice, notify any affected donor, and make any report the law requires.	Executive Director	Within 24 hours of that finding

Table 7. Resolving a possible match.

Where a match is confirmed, KTN does not proceed with the relationship, does not release funds, and takes legal advice before communicating anything to the person concerned, because informing them may itself be an offence in some jurisdictions.

6.3 Records

The screening register at Annex A records, for every check: the date, the name checked, the reason for the check, the lists searched, the result, who performed it, and where the evidence is filed. It is a spreadsheet held by the finance function with restricted access, backed up with KTN's other financial records. Records are kept for seven years from the end of the relationship, in line with the Records Management and Retention Schedule.

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CHAPTER SEVEN

RISK MANAGEMENT AND INTERNAL CONTROLS

Where KTN is most exposed and what controls apply.

7 Risk Management and Internal Controls

Where KTN is most exposed and what controls apply.

7.1 Risk Register

Risk	Why it applies to KTN	Control
Funds reach a trafficking network	KTN operates where those networks operate, and pays caregivers and local suppliers in a cash economy	Screening; verified payees; receipting against named recipients; case worker knowledge of the household
A designated person is engaged as staff or volunteer	Recruitment draws from the same communities the corridor runs through	Pre-engagement screening; safer recruitment; two written references
Cash cannot be traced	Formal identification is not universal in the sub-region	Identity verified by ID, LC1 letter or case worker recognition, with the method recorded; cash limits in the Finance Policy
Tainted donation accepted	A young organisation seeking funds is more exposed to an unsuitable offer	Screening of donors; the funding red lines in the Resource Mobilisation Strategy; Board approval for unusual gifts
Cross-border exposure	Children reach Kenya and KTN plans future engagement there	No payments outside Uganda without Board approval and screening; the cross-border limits in the Child Safeguarding Policy
Screening not done under pressure	One person carries the function alongside other duties	Payment blocked where screening is incomplete; quarterly independent sampling by the Sub-Committee

Table 8. Where KTN is exposed, and what controls apply.

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CHAPTER EIGHT

COMPLIANCE, MONITORING AND REPORTING

What is checked, by whom, and what reaches the Board.

8 Compliance, Monitoring and Reporting

What is checked, by whom, and what reaches the Board.

8.1 Compliance, Monitoring and Reporting

Indicator	Target	Frequency
Engagements screened before start	100%	Quarterly
Payments above the low-value band screened before first payment	100%	Quarterly
Screening evidence on file for sampled transactions	100%	Quarterly sample
Possible matches resolved and documented within 3 working days	100%	As arising
Register reviewed by the Sub-Committee	4 per year	Quarterly

Table 9. What is measured.

8.2 Records, Audit Trail and Retention

A check that is not recorded did not happen. That principle is stated at Section 3.2 and this section is where it is made operable: what the audit trail must contain, how long each record is kept, and how it is protected and disposed of. The screening register at Annex A is the spine of it, and it is the first thing a funder's due diligence will ask to see.

The audit trail

Recorded when it happens. Every check is entered in the screening register at Annex A on the day it is performed, whether or not anything was found. A clear result is as much a record as a match.

Evidence, not assertion. Each entry is supported by a dated printout or screenshot of the search result, saved to the relationship file. The register says where that evidence is filed, so a sample can be traced without asking anyone.

Every decision, with its reason. A possible match resolved as a false positive is documented, not merely dismissed: which identifiers were compared, what the conclusion was, who reached it and when, on the decision record at Annex B. That record is retained even where the match is dismissed.

Urgent payments are reconciled, not excused. Where a protective payment is made before screening under the principle at Section 3.2, the screening is completed immediately afterwards and the register records both the payment and the reason it could not wait.

One controlled register. The register is a single spreadsheet held by the finance function with restricted access, backed up with KTN's other financial records. It is not a set of personal files.

No silent edits. Entries are not altered after the fact. A correction is made as a new dated entry explaining what was wrong, so the sequence of what was known and when survives.

Systems keep their own log. Where the register is held electronically, the system records who opened and changed each entry, and those logs are retained under the schedule below.

Retention periods

The periods below are minimums and align with the seven years stated at Section 6.3. Where a donor agreement, an open investigation, a report to the authorities, or a legal claim requires longer, the longer period applies and nothing is disposed of until the matter is closed.

Record	Minimum retention	Held by

Screening register	10 years from the end of the financial year	Finance function
Screening evidence for an engagement or payment	7 years from the end of the relationship	Finance function
Possible match decision record, resolved as a false positive	7 years from the decision	Executive Director
Possible match confirmed, and any report to the authorities	25 years from closure	Board, through the policy custodian
Beneficial ownership records for partners and suppliers	7 years from the end of the agreement	Executive Director
Donor and in-kind gift screening, including declined offers	10 years from the end of the financial year	Finance function
Field cash receipts and the identity method recorded	7 years from the end of the financial year	Finance function
Agreements containing the Annex C clause	7 years from the end of the agreement	Executive Director
Board and Sub-Committee papers recording this policy's reports	Permanent	Board Secretary
System access and edit logs for the register	12 months, with 3 months immediately retrievable	Whoever holds the information technology function

Table 10. Minimum retention periods.

Protection, review and disposal

Protected while held. The register and its evidence are restricted to the finance function and the Executive Director. A possible match is confidential: the person concerned is not told they are being checked against a terrorism list, and legal advice is taken before anything is communicated.

Reviewed once a year. The finance function reviews the register against this schedule annually and confirms to the Finance and Audit Sub-Committee that the review has been done.

Disposed of so it cannot be recovered. Paper is shredded and electronic records are deleted from live systems and backups. What was destroyed, when, and on whose authority is itself recorded, and that record is kept.

The Executive Director confirms to the Board each quarter that screening is current, and reports annually on the operation of this policy. Any unresolved possible match reaches the Board Chairperson within 24 hours.

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CHAPTER NINE

ENFORCEMENT, IMPROVEMENT AND REVIEW

Consequences of a breach, and how this policy is kept current.

9 Enforcement, Improvement and Review

Consequences of a breach, and how this policy is kept current.

9.1 Breaches

Failure to screen, proceeding with a transaction after a possible match, structuring a payment to avoid a threshold, or concealing the source of a donation is a serious disciplinary matter and may amount to gross misconduct. Where conduct may be criminal, KTN reports it to the authorities irrespective of any internal process. A person who raises a concern in good faith under this policy is protected by the Whistleblowing and Protected Disclosure Policy.

9.2 Review and What Changes as KTN Grows

This policy is reviewed every two years, and earlier on receipt of the legal advice at Chapter 3, on a change in the law, on the first institutional grant, or on any incident under this policy.

Provision	Now	Trigger to strengthen
Screening Officer	Executive Director with the finance function	First institutional grant, or staffing that allows a separate post
Screening sources	Free public lists, manual search and record	Where a donor requires a commercial subscription, or where transaction volume makes manual checking unreliable
Thresholds	Set by Board resolution in the schedule of limits	Reviewed annually with the budget
Legal position	Confirmation sought on which statutory obligations apply	Receipt of advice

Table 11. Provisions that tighten as KTN grows.

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CHAPTER TEN

ANNEXES

The working tools: the screening record, the decision flow and the donor clause.

10 Annexes

The working tools: the screening record, the decision flow and the donor clause.

10.1 Annex A: Screening Register

Held by the finance function as a spreadsheet with restricted access. One row per check.

Field	What is recorded
Date of check	
Name checked	
Type	Staff, volunteer, board, supplier, partner, donor, other
Reason	New engagement, first payment, annual refresh, change of circumstances
Lists searched	UN Consolidated, and any donor-required list
Result	No match, or possible match
Evidence location	Where the dated printout is filed
Performed by	
Outcome and reasons	

Table 12. The screening register.

10.2 Annex B: Possible Match Decision Record

Completed for every possible match, whatever the outcome, and retained even where the match is dismissed. Records the name and the listing compared, the identifiers checked, the conclusion, the reasons, who decided, the date, and who was informed.

10.3 Annex C: Standard Clause for Agreements

Included in every partner, sub-grant, supplier and consultancy agreement.

MODEL CLAUSE

The Party warrants that neither it, nor any of its directors, officers, personnel or beneficial owners, is subject to any counter-terrorism or sanctions measure, and undertakes to notify KTN immediately should that change.

The Party shall not use any funds received from KTN to provide support to any designated person or entity, shall permit KTN and its funders to verify compliance, and shall impose these same obligations in writing on any sub-contractor or sub-grantee it engages on this work.

Breach of this clause entitles KTN to suspend payment immediately, to terminate the agreement, and to recover funds where a funder's rules so require. This clause survives termination.

SHIELDING PASTORALIST CHILDREN · BUILDING FUTURES · LEADING CHANGE

Behind every number is a child with a name.

KTN works in a region where money can move quietly and questions are rarely asked. This policy is where KTN asks them. Every shilling that enters and leaves has a name behind it, and KTN is answerable for both.

Karamoja Tumaini Network

Hope · Heal · Empower

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