Indian Futures

Terrorism Financing and Financial Crime Policy (Terrorist Financing, Money Laundering, Sanctions and Export Control)

Written by: Lucía Awad (Volunteer)

Reviewed by: Anna Amado (Project Manager)

Last review: 23/09/24

Next review: 23/03/26

www.indianfutures.org
indianfuturesfundraising@gmail.com
UK Charity Reg. No: 1173474

Introduction

Indian Futures denounces all forms of terrorism and will never knowingly support, tolerate, or encourage terrorism or the activities of those who use and/or finance terrorism. Indian Futures is firmly committed to the international fight against terrorism, and in particular against the financing of terrorism and any related activities, more specifically the laundering of funds of illicit origin. As such, Indian Futures considers it is vital to properly understand the problems related to money laundering, money from criminal activities and the financing of terrorism.

In accordance with UK's counter-terrorism legislation, Indian Futures is determined to the highest ethical standards for taking preventative measures against money laundering and financing of terrorism, consistent with the strategies established by the Charity Commission.

Definitions

A "**terrorist act[1]"** is an act, or a threat to act, that meets both these criteria:

- Terrorism intends to coerce or influence the public or any government by intimidation to advance a political, religious, or ideological cause.
- Terrorism causes one or more of the following: death; serious harm or danger to a person; serious damage to property; a serious risk to the health or safety of the public; and serious interference with, disruption to, or destruction of critical infrastructure such as a telecommunications or electricity network.
- Advocating, protesting, dissenting, or taking industrial action are not terrorist acts where the person doing the activity does not intend to cause serious harm to a person or create a serious risk to public safety.

"Money laundering[2]" is the process by which the proceeds of crime are channelled through financial systems in an effort to disguise their illegal origin and returned to the launderer in an indirect manner.

[1] https://www.legislation.gov.uk/ukpga/2000/11/section/1
[2] https://www.fatf-gafi.org/faq/moneylaundering/#:~:text=What%20is%20Money%20Laundering%3F,to%20disguise%20their%20illegal%20origin.

"**Proscribed terrorist group**[3]" – Under the Terrorism Act 2000, the Home Secretary may proscribe an organisation if they believe it is concerned in terrorism, and it is proportionate to do. For the purposes of the Act, this means that the organisation:

- commits or participates in acts of terrorism
- prepares for terrorism
- promotes or encourages terrorism (including the unlawful glorification of terrorism)
- is otherwise concerned in terrorism

"**Implementing Protocols**" or "**Protocols**"- means the Protocols approved by the Executive Board, or under its delegated authority by the relevant Committee, which provide the procedures for implementation of this Policy." ("Terrorism Financing and Financial Crime Policy Principles")

"**Sanctioned" individual or entity** means and individual or entity subject to financial sanctions by the international community (UN), the European Union or Relevant State or any entity beneficially owned (>50%) by an individual or entity subject to such sanctions.

A "**High Risk" country** is a country where known "proscribed terrorist groups" operate

Policy Statement

Indian Futures is highly committed to ensure that all its funds and resources should only be used to further its mission and shall not be used directly or indirectly to support individuals or entities associated with terrorism or to launder funds derived from illegal activities.

The objective of this policy is to prevent Indian Futures' funds and resources to be used in activities related to money laundering or terrorist financing.

In this regard, Indian Futures will not purposedly or recklessly provide funds, economic goods, or material support to any entity or individual designated as "terrorist" by the international community and will take all reasonable steps to safeguard and protect its assets from such illicit use and to comply with host government laws.

In pursuing these purposes and objectives, Indian Futures intends to prevent the NGO from suffering reputational damage, financial loss, or legal liability, which can undermine the trust and support of beneficiaries, partners, donors and the wider public.

[3] https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version

www.indianfutures.org
indianfuturesfundraising@gmail.com
UK Charity Reg. No: 1173474

Indian Futures respects its contracts with its donors and puts in place procedures for compliance with these contracts.

Scope and Purpose of Policy

- This policy, and the implementing Protocols, applies to all staff members and consultants of Indian Futures. All implementing partners, donors and suppliers are subject to the measures to prevent financing terrorism and/or money laundering.

- According to the 'Money Laundering and Terrorist Financing (Amendment) (High-Risk Countries) Regulations 2022', India is not a high-risk location for terrorism, and as such no special prevention strategies must be put in place.

- Furthermore, Indian Futures has a long-established partnership with partner organisations (Laia Foundation and Vallalar Educational Trust) which comply with Indian Futures' code of conduct. We believe that, by working in this way, there is a very low risk that our funds will inadvertently find their way into the hands of those who will use them for illicit purposes. However, given the impact that any proven or alleged terrorist funding would have, Indian Futures has already taken several measures to select partner organisations, suppliers, and donors to further reduce this risk.

Governance

Governance and accountability for compliance with Terrorist Financing and Sanctions regulations is a mutual obligation between Affiliates and Indian Futures. Responsibilities are shared at country and regional level (depending on the modalities of the programme), and individual Affiliates retain their own responsibility in their home states.

The board of trustees will:

- Support the implementation of the Policy
- Monitor the management and reporting of incidents of actual or suspected breach of Policy
- Review this policy on a yearly basis and report to the board of trustees on its implementation and matters arising

www.indianfutures.org
indianfuturesfundraising@gmail.com
UK Charity Reg. No: 1173474

Prevention

Indian Futures has the following preventative measures in place to reduce the risk of accidentally and deliberately funding of terrorism or being used for money laundering:

Code of Conduct: Indian Futures enforces a Code of Conduct among its staff and contract partners. Staff and contract partners sign up to the Code of Conduct on joining the organisation or signing a contract with Indian Futures. The Code of Conduct specifically mentions that staff and contract partners should contribute to preventing unethical and criminal activities.

Due Diligence on partners, suppliers, and donors: Indian Futures will screen Partners, Staff and Suppliers on a proportionate basis to prevent the direct transfer of funds etc. to "designated" or sanctioned individuals or entities. Protocols will be developed for the screening of Partners, Staff and Suppliers.

- To make sure that Indian Futures doesn't enter into financial relations with terrorist or criminal organisations, Indian Futures runs two checks when first working with a partner charity:
    - Partnership agreement: all new charities need to provide information on charity status and evidence their accounts are up-to-date and audited by an external agency
    - Partner reference: Indian Futures contacts at least three charities the potential partner has worked with and requests a partner reference

- For all new partner organisations, a partner risk assessment is performed, indicating the different risks of working together with this partner. Based on the assessment, risk mitigating measures are taken to reduce the identified risks.

- Where additional checks may be needed to comply with Affiliate requirements these may be undertaken on an ad hoc basis. Only when additional research gives guarantees, cooperation with the organisation can be considered.

- The Project Coordinator will report progress on screening and positive matches found to the board of trustees as a standing item on a regular basis, or as provided in the Screening Protocol.

- Indian Futures will generally only check the names of beneficiaries against any list of "designated" terrorists in the following circumstances:
    - It is an explicit term in a donor or supplier contract and the terms of the contract have been approved by the relevant Affiliates and the Country Director;

- The beneficiaries are informed as to the use made of their personal data prior to that information being collected; or
- Where substantial grants to beneficiaries are involved (e.g., funding above levels required for humanitarian assistance, for example grants for business start-up schemes in "high risk" countries).

Indian Futures will take steps to manage Partners and "down-stream" use of funds. Indian Futures, through its board of trustees, is responsible to donors and for compliance for the use made of Indian Futures' funds by third parties, that is suppliers, partners, banks etc.

Ensuring transparency in financial flows within Indian Futures: Protocols will enable financial transfers by Indian Futures to country programmes to meet the expectations of banking partners through the identification of the end destination of funds in payment transfer requests and guidance on how to deal with any transfers blocked, returned or frozen by a bank.

Segregation of duties: Responsibilities in key financial processes are separated among several employees rather than entrusted to one employee. Signatures and/or system workflow approvals are required at different stages in any financial transaction process in order to avoid unauthorised transactions.

"Three lines of defence"-internal control system: Indian Futures has an internal control system that follows the "three-lines-of-defence"-approach. The first line is the policies, processes, and procedures for the management of operations. The second line is the risk management processes which seek to identify gaps and exposures. The third line is the internal audit function, which independently monitors these first two lines.

Proper books and records: Indian Futures' board of trustees will always act in accordance with its Reserves policy in order to ensure its financial health. All income and expenditure is linked to donor/source coding and all program expenditure is linked to specific projects and partner coding. In addition, Indian Futures retains all supporting documentation (receipts, invoices and supporting documents) in line with legislative requirements.

Cash and Bank management: Controls include regular cash counts and monthly bank reconciliations, authorisation levels to carry out financial operations, segregation of duties, signatures/system approvals. In addition, when used, cheques require two signatures, and all bank transfers require dual signatures.

Detection

Indian Futures' partner organisations (Laia foundation and Vallalar Educational Trust) undergo an annual external audit of their financial statements. Given the amount of revenue that Indian Futures holds, it does not yet require this process.

Banking system: Indian Futures transfers all of its funds through The Co-operative Bank, which falls under the sanction regulations of the United Kingdom and of the United Nations[4]. As a consequence, all transfers Indian Futures makes are screened and transfers to high-risk countries are explicitly checked and need detailed information on purpose and destination of the transfer. In case of insufficient documentation, transfers will not be accepted by the banks. UK banks are also obliged to notify tax authorities in case of suspicious transactions related to money laundering.

Monitoring & Reporting

Enabling reports

- Indian Futures is committed to provide accessible means of reporting terrorism financing and/or financial crime concerns to the trustees and volunteers in the UK, and also when volunteers travel to India for monitoring purposes.
- Any staff reporting such concerns or complaints through formal whistleblowing channels (or if they request it) will be protected as stated by the law[5].
- Indian Futures will also accept complaints from external sources such as members of the public, partners, and official bodies.

Incident Reporting and Investigation

All incidents of possible criminal activities that are proactively and/or retroactively noticed within Indian Futures, will be reported to the board of trustees. Suspicions of financing terrorism and/or money laundering will also be dealt with by the board of trustees.

Protocols will provide for the reporting of breaches, allegations, incidents, and suspicions of breaches of policy. The Protocols will include:

- Guidance on what to report and when

[4] https://www.gov.uk/government/collections/uk-international-counter-terrorism-sanctions

[5] Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). For more information on whistleblowing go to: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415175/bis-15-200-whistleblowing-guidance-for-employers-and-code-of-practice.pdf

- Internal reporting: ensuring all relevant Indian Futures' parties are informed, and
- External reporting: ensuring all relevant back donors and authorities (including the Charity Commission) are informed.

How to report a financing terrorism or financial crime concern

- Trustees, staff, volunteers and third parties must, as soon as practicable, report any suspicion that an incident has taken place, may be taking place, or could take place. They may do this through direct reporting to their line manager or completing Indian Futures' terrorism financing and financial crime report form[6]. If the staff member does not feel comfortable reporting to their line manager (for example if that person is involved in the concern) they may report to any other appropriate staff member. For example, this could be a senior manager or a Trustee.

- If a person wants to report confidentially, including with anonymity, they may use the terrorism financing and financial crime report form[7] -also available on the website- and email it to indianfuturesfundraising@gmail.com or post it to Indian Futures, 10 Sudeley Place, Brighton BN2 1HF.

Response

- All suspected, perceived, potential or actual incidents will be managed through the incident response plan.[8]

- Indian Futures will apply appropriate disciplinary measures to any employee or related personnel found in breach of policy. This may include administrative or disciplinary action, legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.

External reporting

- Indian Futures will 1) report any suspicion of a criminal offence to the National Crime Agency or a police officer[9] and the Charity Commission[10]; 2) meet all donor requirements regarding the reporting of incidents.

[6] See Annex for terrorism financing and financial crime report form
[7] Ibid.
[8] See Annex for incident response plan template
[9] In compliance with section 19 of the Terrorism Act 2000 (TACT).
[10] Online reporting through the link https://register-of-charities.charitycommission.gov.uk/report-a-serious-incident

Confidentiality

- It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.

Responsibilities

The board of trustees is the owner of this Terrorism Financing and Financial Crime Policy and approves the policy. The board of trustees is also responsible for keeping this procedure up to date and review the policy at least on an annual basis.

All staff will be informed through Indian Futures' communication channels on updates of the policy.

www.indianfutures.org
indianfuturesfundraising@gmail.com
UK Charity Reg. No: 1173474

ANNEX 1 **- Indian Futures' Code of Conduct**

Introduction

In keeping with its vision and values, Indian Futures is committed to maintaining the highest degree of ethical conduct amongst all its staff and associated personnel. To help increase understanding, this Code of Conduct details Indian Futures' expectations of staff in key areas.

Scope and purpose

This Code of Conduct applies to all contracted staff, international and local, employed by Indian Futures, volunteers, partners, contractors, and suppliers.

The purpose of this Code of Conduct is to set out the conduct expected of Indian Futures' staff whilst under contract to the organisation, and forms part of all employment and volunteer contracts. The Code is applicable at all times. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

Whilst recognising that local laws and cultures differ considerably from one country to another, Indian Futures is an International Non-Governmental Organisation, and therefore the Code of Conduct is developed from international and UN standards. Indian Futures staff are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

Code of Conduct Standards

As an Indian Futures' employee or related personnel, I will:

Uphold the integrity and reputation of Indian Futures by ensuring that my professional and personal conduct is consistent with Indian Futures' values and standards

- I will treat all people fairly with respect and dignity
- When working in an international context or travelling internationally on behalf of Indian Futures, I will be observant of all local laws and be sensitive to local customs
- I will seek to ensure that my conduct does not bring Indian Futures into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed

- I will not work under the influence of alcohol or use, or be in possession of, illegal substances on Indian futures premises or accommodation

Not engage in abusive or exploitative conduct

- I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence
- I will not exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance
- I will not engage in sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics
- I will not engage in any commercially exploitative activities with children or vulnerable adults including child labour or trafficking
- I will not physically assault a child or vulnerable adult
- I will not emotionally or psychologically abuse a child or vulnerable adult

Ensure the safety, health and welfare of all Indian Futures' staff members and associated personnel (volunteers, partners, suppliers, and contractors)

- I will adhere to all legal and organisational health and safety requirements in force at my location of work
- I will comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines
- I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of myself and others, including partner organisations and communities with whom we work

Be responsible for the use of information, assets, and resources to which I have access by reason of my employment with Indian Futures

- I will ensure that I use Indian Futures' assets and resources entrusted to me in a responsible manner and will account for all money and property

- I will not use Indian Futures' IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism

- I will not use Indian Futures' IT equipment to view, download, create, distribute, or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse

Perform my duties and conduct my private life in a manner that avoids conflicts of interest

- I will declare any financial, personal, or family (or close intimate relationship) interest in matters of official business which may impact on the work of Indian Futures

- I will not be involved in awarding benefits, contracts for goods or services, employment, or promotion within Indian Futures, to any person with whom I have a financial, personal, family (or close intimate relationship) interests

- I will seek permission before agreeing to being nominated as a prospective candidate or another official role for any political party

- I will not accept significant gifts or any remuneration from governments, communities with whom we work, donors, suppliers and other persons which have been offered to me as a result of my employment with Indian Futures

Uphold confidentiality

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so

<u>Complaints and reports</u>

Indian Futures staff are obligated to bring to the attention of the relevant manager any potential incident, abuse, or concern that they witness, are made aware of, or suspect which appears to breach the Standards contained in this Code. Indian Futures' staff reporting concerns are protected by the Disclosure of Malpractice in the Workplace policy.

Staff members who have a complaint or concern relating to a breach of the Code should report it immediately to their line manager. If the staff member does not feel comfortable

reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to one of the Trustees.

Staff members receiving reports or concerns are obliged to action or refer the report immediately as per the Indian Futures' Complaints Policy and procedures.

www.indianfutures.org
indianfuturesfundraising@gmail.com
UK Charity Reg. No: 1173474

***ANNEX 2*- Terrorism Financing and Financial Crime Incident Response Plan**

Purpose

This incident response plan is a mandatory procedure that ensures Indian Futures:

- manages risks to people when there is reasonable suspicion that an incident has taken place, is taking place, or will take place;
- manages the risks that come from its response to an incident;
- takes opportunities to improve its financial crime prevention approach.

Scope

This plan applies to:

- All trustees, staff and volunteers;
- All operations carried out by third parties that are funded by Indian Futures in part or in full;
- All incidents of suspected Terrorism Financing and Financial Crime Policy (Money Laundering, Sanctions and Export Control).

Failure to follow this plan may be considered a serious disciplinary matter.

Legislative requirements

There are legislative requirements governing Indian Futures' approach to financial crime. These requirements will be met in parallel with the actions of this plan and will take precedence.

The legislative requirements are:

- Money laundering: Indian Futures must report allegations or incidents of money laundering to Action Fraud via its online reporting tool, ensuring they obtain a crime reference number and making clear that they're representing Indian Futures.
- Links to terrorism: Indian Futures must report links or alleged links to terrorism to the police and obtain a crime reference number. This can be done in the following ways:
    - via the National Crime Agency website
    - calling the Metropolitan Police Anti-Terrorist Hotline on 0800 789 321

  - calling 101 or reporting it at a local police station

- Unverified or suspicious donations: trustees should report unverified or suspicious donations totalling £25,000 or more, providing the necessary assurance that appropriate checks have been made before accepting/declining the donation.
- All financial crimes and links to terrorism will be reported to the Charity Commission of England and Wales. It is for the Charity Commission to provide recommendations to Indian Futures to solve the matter and inform of the potential consequences of such a breach.
- It is Indian Futures' responsibility to follow the Charity Commission's recommendations in such instances.

Defining an incident

The main categories of reportable financial crimes are defined below:

- Links to terrorism (terrorist financing). These types of incidents include discovering that someone within or connected to the charity does business with, or has links to, terrorist groups, or is subject to an asset freeze; also, where property has been stolen by terrorist groups, or charity money, personnel or other assets used to support terrorist activities.
- Money laundering
- Unverified or suspicious donations. These can be used for money laundering but may also include use of donations to dispose of the proceeds of crime or to avoid/evade tax.
- Other suspicious financial activity connected to the charity's funds. This might include requests from third parties to: cash a cheque for a large sum of money; convert large quantities of cash into another currency; pay a fee to release funds to be donated to the charity.

Responding to a suspicion of an incident

<u>Phase One: Forming a suspicion</u>

What is a 'financial crime suspicion' and when should you report it?

- A 'suspicion' is the belief, opinion or impression that an act of intentional wrongdoing has occurred or has been attempted. The suspicion should be reasonably held (i.e., there should be some objective grounds for the suspicion – the person reporting should be able to explain why they are suspicious), but it might involve limited or no formal evidence at all.

- To activate Indian Futures' financial crimes response, the suspicion should be that an act - money laundering or terrorist financing - has occurred or is occurring, or that an attempt has been or is being made to carry out any of these. This applies to any Indian Futures' operations, including those conducted via third parties.

Indian Futures will follow the Charity Commission's guidelines and recommendations of when to report an incident[11].

If Indian Futures decides that an incident is not serious enough to report, the situation will be handled appropriately and reasonable steps will be taken, such as tightening financial controls and procedures, to ensure it doesn't happen again.

Failure to report instances, allegations, disclosures or concerns about terrorism financing and financial crime will be viewed as a serious matter that may, depending on the circumstances, result in disciplinary action or dismissal.

Phase Two: Reporting a suspicion

The Terrorism Financing and Financial Crime Policy creates two means by which someone may report a suspicion:

- Overtly: directly reporting to any member of the Board, or their manager or supervisor.
- Confidentially: using Indian Futures' confidential reporting system: post anonymous letter containing 1) description of the report and 2) expected outcome of report to Indian Futures, 10 Sudeley Place, Brighton BN2 1HF.

The person receiving the report of a suspicion must notify the line manager or any member of the Board, who will be responsible for managing the incident.

When receiving a report:

- Use active listening, be calm, supportive, and reassuring with any potential victim or witness. Concentrate on making the person providing information feel that they are doing the right thing and that you are there to help them.

[11]"How to report a serious incident in your charity"- The Charity Commission
https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity#laundering

- Explain what you will do with the information.
- Explain that you are required to pass the information to their line manager/any member of the board and that Indian Futures will take the matter seriously.
- Get as much information as possible from the source of the concern, if appropriate in the circumstances.

When receiving a report, do not:

- Make promises to any person, except to say that Indian Futures will take the matter seriously.
- Investigate the matter yourself.
- Disclose the information to people other than those you are required to tell.
- Approach the suspect about the incident, challenge the suspect or share information about the incident with the suspect.
- Make judgements about the validity, credibility, or veracity of the information.

Phase Three: Managing Indian Futures' response to a suspicion

Upon being notified of the incident, the investigator will:

- Seek further information to help make decisions
- Initiate a rule that states the information will only be made available to people who need to know.

The investigator will convene an Incident Committee to work with them to resolve the incident. The committee will comprise at least 2 of the following people (plus the investigator): Anna Amado, Sushma Clark, Adeline White and/or Gilly Woodley.

The purpose of the Committee is to provide accountability and guidance to the investigator, as well as knowledge and experience across different areas of the charity to help successfully manage an incident.

All incidents require investigation. If a matter has not been referred to the police then, depending on the nature of the matter, the Incident Committee will be guided by the principles of independence and competence:

- What is the best way to carry out an internal investigation independently and objectively?
- What resources are available, internally, or externally, to carry out an investigation to the correct level of competence and fairness?

Any person under suspicion must be treated lawfully and with due regard for their own safety, security and needs. This includes providing the person with updates, keeping in mind the need for confidentiality.

Phase Four: Taking action following a suspicion

The Incident Committee will consider the outcomes following an investigation. Possible outcomes may include:

- No further action
- Disciplinary action
- Seeking criminal prosecution, civil action, or referral to law enforcement.

Following every incident, Indian Futures will document the lessons learned with the aim of improving the way it manages incidents. This will take a holistic approach, framed by the following questions:

- How will we better deter persons from behaving in this way again?
- How could we better detect an incident like this again?
- How could we better manage an incident like this again?

The Incident Committee will be responsible for meeting any obligations to report to an external body.

Phase Five: Concluding the response to a suspicion

To close an incident, the investigator must be satisfied that:

- There are records of the incident that show:
    - How the incident arose and how it was handled

  - The details of the original concern and other relevant information
  - The details of the decisions that were made
  - The evidence collected
  - The details of the actions taken
  - External reporting of the incident (if required).
- Lessons have been documented and used to improve the way Indian Futures manages incidents in the future.

Administering this plan

Any information regarding the effectiveness and performance of this plan must be passed to any of the members of the Incident Committee, as detailed above.

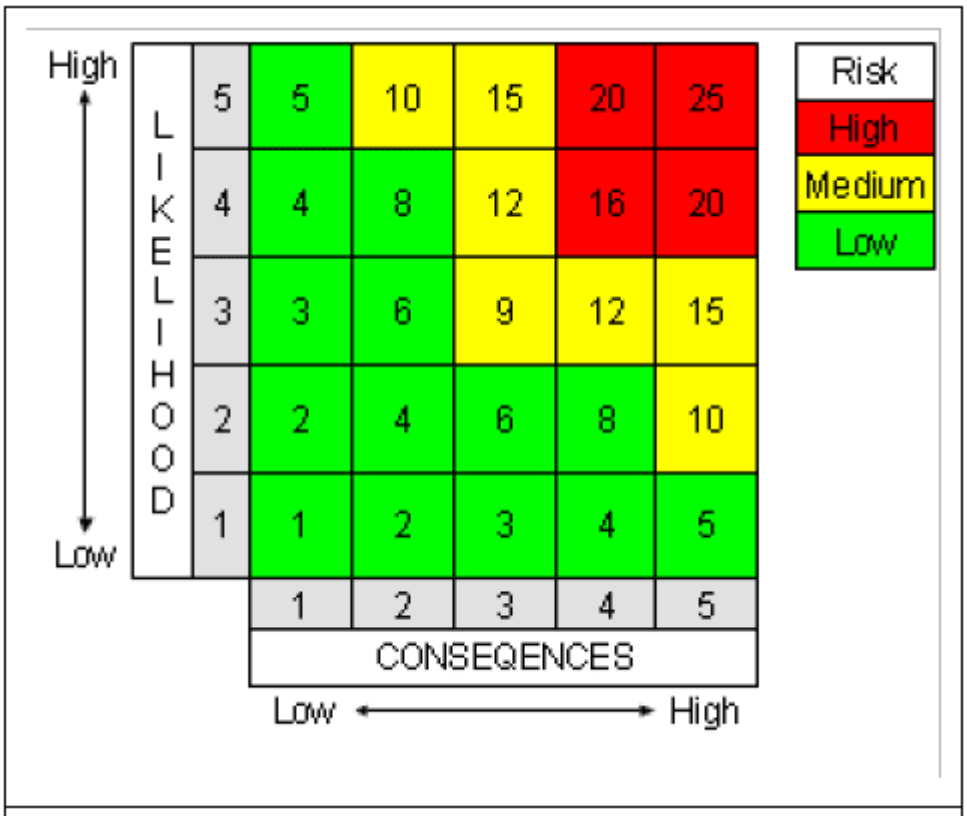
This plan will be reviewed every two years. The next review will be on 15/01/23.

www.indianfutures.org
indianfuturesfundraising@gmail.com
UK Charity Reg. No: 1173474

***ANNEX 3*- Risk assessment template**

For any safeguarding risks not mentioned under the section 'Defining an incident' of the Safeguarding Incident Response Plan, please use the following risk assessment template:

POTENTIAL RISK	WHO IS AT RISK?	RISK RATING (1-25)*	MITIGATION/CONTROLS	WHO IS RESPONSIBLE?

www.indianfutures.org
indianfuturesfundraising@gmail.com
UK Charity Reg. No: 1173474

*Risk Matrix: