

GOODENOUGH COLLEGE

Sanctions Policy

Goodenough College is committed to complying with all applicable sanctions laws and regulations in the United Kingdom and any relevant jurisdictions in which we operate. This policy is intended to ensure that our charity does not receive funds or provide funds, goods, services or other economic benefits - directly or indirectly - to individuals, entities or countries subject to sanctions.

Our College activities include:

- Providing student accommodation to British and international students;
- Operating a hotel, short stay and events business;
- Providing catering services;
- Providing residential accommodation in investment properties;
- Using subcontractors and third-party suppliers.

This policy applies to:

- All Trustees, employees, casual workers, volunteers;
- Contractors, agency workers and subcontractors engaged by Goodenough College and its subsidiaries;
- All areas of our operations, including:
 - organisation, encouragement and assistance in the education of resident members of the College from any part of the world,
 - provision of accommodation for international students,
 - hotel and short stay operations,
 - event and catering services,
 - any related facilities or outsourced services.

Relevant Laws & Regulations

We comply with:

- UK Sanctions and Anti-Money Laundering Act 2018 (SAML A);
- Regulations and guidance issued by the UK Office of Financial Sanctions Implementation (OFSI);
- Any applicable UN or other international sanctions regimes implemented in UK law.

We take into consideration the [Financial sanctions guidance for charities and non-governmental organisations](#) provided by the [Office of Financial Sanctions Implementation](#).

We take into consideration the Sanctions Policy of Barclays Bank plc.

Principles

- **No dealings with sanctioned persons or entities:** we do not engage, contract or provide services to any person, entity, or organisation on the UK Sanctions List.

- **No dealings with sanctioned countries:** we comply with UK territorial and sectoral sanctions, avoiding prohibited trade, financial or service activities.

Due Diligence Process

- Students & Guests

- As all College Members are enrolled on UK university courses, we place reliance on the due diligence processes that we assume have been carried out by the Member's university.
- We ask the name and nationality of prospective Members as part of Member enrolment.
- Where applicants have listed a sanctioned country as their nationality, we ask whether they have links to countries listed as either Restricted or Narrowly Restricted within the Barclays Bank plc Sanctions Policy (on the basis of a list provided by Barclays and appended to this policy).
- For hotel/short stay/event bookings, we obtain identification of the booking party and run sanctions screening for major corporate clients. We investigate any parties considered to be at risk of falling under UK financial sanctions regimes.

- Suppliers & Subcontractors

- We request confirmation from all new suppliers that they do not fall under any UK financial sanction regime, nor do they operate with parties that fall under UK sanctions regimes.
- We include, where relevant, a sanctions compliance clause in contracts, requiring suppliers to confirm they are not sanctioned and will comply with applicable laws.

- Donors & Funders

- We screen all significant donors or sponsors before accepting funds or in-kind donations as set out in the College's [Gift Acceptance Policy](#).

Screening Tools & Records

- We draw on the Barclays Bank plc Sanctions Policy.
- We use the OFSI consolidated sanctions list or an approved third-party screening service, where deemed appropriate.
- We keep records of all screening checks for at least six years.

Red Flags & Escalation

Where a potential match to the sanctions list is identified,

- College staff must not proceed with the transaction or relationship but immediately report the match to the Director of Finance & Resources, who is the Designated Sanctions Compliance Officer (DSCO);
- the DSCO confirms whether the match is true and, if so, reports it to OFSI;
- all staff maintain confidentiality.

Responsibilities

- *All staff* implement this policy, complete sanctions training and report concerns immediately;
- *Managers* ensure compliance within their teams and verify checks are completed;
- *Head of Finance* ensures that financial policies and procedures adhere to the College Sanctions Policy;
- *Registrar* applies the due diligence process for prospective and recruited Members;
- *Designated Sanctions Compliance Officer* oversees implementation, maintains procedures, keeps the sanctions register and liaises with OFSI.

Training

- All staff involved in the financial aspects of College activities will receive sanctions compliance training.

Breaches

Failure to comply with this policy may result in:

- Disciplinary action (up to and including dismissal for employees);
- Termination of contracts with suppliers or sub-contractors;
- Reporting to relevant authorities.

Reporting Concerns

If staff suspect any instance of lack of adherence to the sanctions policy, they should report concerns to their line manager or the Designated Sanctions Compliance Officer.

If they feel unable to raise the matter internally, they may report confidentially to the Chair of the Finance & Audit Committee.

All reports will be taken seriously, investigated promptly and appropriate action taken.

If staff do not consider appropriate action has taken place and compliance with the UK Sanctions regime is not being followed, they should report the matter to the Police.

Review

This policy will be reviewed every two years (or more frequently if there are changes in sanctions laws or our activities in the meantime).

Signed:

Alice Walpole
College Director

Goodenough College
25 March 2026