

**Our Reference: 2502**

FOI Request dated 08/11/2021 as follows –

1. *Are you aware of the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, and anti-money laundering legislation (AML) in general? If so, what measures does your institution take to comply with these?*
2. *Do you consider your University to be a ‘high value dealer’ for the purposes of the Money Laundering Regulations 2017? Yes No Don’t know*
3. *Does your university have an AML policy? If so, where is this policy published?*
4. *Are university staff provided with AML training? If so, what categories of staff are required to complete training?*
5. *Are students provided with guidance on financial crime and/or organised crime, including the risks and dangers posed to students?*
6. *How many suspicious activity reports have you submitted to the National Crime Agency?*
7. *Do you accept cash payments for tuition fees and accommodation payments? If so, is there a limit on the amount that can be paid in cash? How many cash payments did you receive in 2019/2020 and what was the total value of these payments?*
8. *Do you use any data related technology to combat risk and threat regarding the protection of students / candidates and third-party anti-fraud measures?*
9. *Do you accept third party payments on behalf of international students? For example, from persons other than the student, or companies that are not registered sponsors. This would, for example, include any payment not in the name of the student or the student’s parent / legal guardian. If yes, are third party payments subject to further or different checks to direct payments?*
10. *Do your payment acceptance processes vary depending upon, for example, a student’s home country or other factors?*
11. *What due diligence checks do you make as part of your sponsor registration process? Do these vary depending upon which country the company or student is registered within*

**Response**

1. Are you aware of the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, and anti-money laundering legislation (AML) in general? If so, what measures does your institution take to comply with these? **Yes, please see link**

**<https://www.hull.ac.uk/choose-hull/study-at-hull/money/docs/fee-policy.pdf> & further details below**

2. Do you consider your University to be a ‘high value dealer’ for the purposes of the Money Laundering Regulations 2017? **No**
3. Does your university have an AML policy? If so, where is this policy published? **We have a drafted policy which is awaiting finalisation. However please see following link which**

relates <https://www.hull.ac.uk/choose-hull/study-at-hull/money/undergraduate-fees> & <https://www.hull.ac.uk/choose-hull/study-at-hull/money/docs/fee-policy.pdf>

4. Are university staff provided with AML training? If so, what categories of staff are required to complete training? **Not all University staff are AML Trained, however those working in the Fee Collection Service team have all been trained on AML.**
5. Are students provided with guidance on financial crime and/or organised crime, including the risks and dangers posed to students? **We direct our students to make payments through our Student portal to ensure the security of the payment, not only for the student, but the University. We also provide students with information to prevent fee scams before they enrol so they are able to make informed choices. There is also some guidance is on the following link <https://www.hull.ac.uk/choose-hull/study-at-hull/money/undergraduate-fees> & <https://www.hull.ac.uk/choose-hull/study-at-hull/money/docs/fee-policy.pdf> . We are also providing webinars on fraud, before our students enrol and how it could affect them. This also includes information on not accepting payments from third parties.**
6. 6. How many suspicious activity reports have you submitted to the National Crime Agency? - **We are unable to provide the requested information on this occasion, in line with Section 17 of the Act, this response acts as a Refusal Notice. The Act contains a number of exemptions that allow public authorities to withhold certain information from release. We have applied the following exemption to your request – Section 31 (1)(a) – Law Enforcement. Please see Q8.**
  7. Do you accept cash payments for tuition fees and accommodation payments? If so, is there a limit on the amount that can be paid in cash? How many cash payments did you receive in 2019/2020 and what was the total value of these payments? **We do not accept cash as a form of payment in person or into the University bank account and have not done so since June 2018. This is also on the link provided in Q3.**
8. 8. Do you use any data related technology to combat risk and threat regarding the protection of students / candidates and third-party anti-fraud measures? - **We are unable to provide the requested information on this occasion, in line with Section 17 of the Act, this response acts as a Refusal Notice. The Act contains a number of exemptions that allow public authorities to withhold certain information from release. We have applied the following exemption to your request – Section 31 (1)(a) – Law Enforcement.**

As with other large organisations; universities are reliant on the smooth running of their IT & Technology. Maintaining the security of these is a significant challenge for all universities, who are increasingly subject to both general cyber security threats and targeted attempts to obtain information from students/staff. Release of any information under the Act represents a disclosure to the world, and it is our belief that if information was disclosed about the data related technology to combat risk and threat, a motivated individual or group could use this information to target any potential vulnerabilities, exposing the University's IT systems to various types of unlawful attack, and consequently prejudicing the prevention of criminal activity.

Having determined the aforementioned in that disclosure of this information would expose the University to a real and significant risk of crime, application of S31 (1) Law Enforcement also requires us to consider the public interest in withholding/disclosing the information.

Factors in favour of disclosure –

- Increase public understanding of the University's information technology systems and processes, and how it manages its business.

- **Enhancing the transparency and accountability of our cyber security system and about our ability to protect our systems and assets.**

**Factors against disclosure –**

- **Protecting the ability of public authorities to protect valuable public assets acquired with public funds.**
- **There is a strong public interest in not publishing information which might expose the University to cyber-attacks and in preventing criminal activity that could damage the running of the University and the security aspect of the information held.**

**After considering the above factors, we believe the factors against disclosure outweigh those in favour, and therefore applying Section 31 on this basis.**

9. Do you accept third party payments on behalf of international students? For example, from persons other than the student, or companies that are not registered sponsors. This would, for example, include any payment not in the name of the student or the student's parent / legal guardian. If yes, are third party payments subject to further or different checks to direct payments? **We do not accept payments paid directly into the University bank account unless with prior agreement. We ask our students a series of questions to ensure the payment is not coming from a third party. Students are asked to pay through the MyHull portal through WPM or Flywire who carry out third party checks.**
10. Do your payment acceptance processes vary depending upon, for example, a student's home country or other factors? **Please see links referenced in Q1,3 and 5**
11. What due diligence checks do you make as part of your sponsor registration process? Do these vary depending upon which country the company or student is registered within? **Please see links referenced in Q1,3 and 5**