

## Appendix 7. Counter Terrorism Policy

(Next review by November 2025)

Policy number	7	Current policy version	5
Original policy approved	Jan 2010	Previous review date	Dec 2019
Current policy reviewed by CEO	JP	Current version approved by Committee of Management on <i>(amended 25 Nov 2023)</i>	Nov 2022
Responsible person	CEO	Scheduled review date by	Nov 2025

### Introduction

The international community and Australian Government have taken strong measures against terrorism through domestic laws and UN Security Council resolutions.

Assisi Aid Projects (Assisi) recognises that non-government organisations (NGOs) are at risk of being misused by individuals and organisations to support terrorist activities.

International NGOs may be targeted by terrorist organisations given they generally have a high level of public trust and often work in close proximity to terrorist activities.

As such, Assisi acknowledges its responsibility to take reasonable steps to ensure that its activities do not contribute towards or support terrorism.

### Purpose

The purpose of the policy is to:

- Outline Assisi’s position on avoiding involvement in terrorist activities, avoiding supporting terrorism, and avoiding supporting individuals and organisations that support terrorism.
- Detail Assisi’s commitment to complying with United Nation’s resolutions, Australian law, and the law of relevant partner countries that relate to counter terrorism.

### Scope

This policy extends to two areas of Assisi’s work: in Australia, and overseas. This policy applies to all Assisi staff, members, Governing Body members (including both Committee of Management and subcommittee members), volunteers, interns, representatives, contractors, and visitors to project sites (hereinafter referred to as “personnel”).

In addition, Assisi will support in-country partners to understand the principles of this policy,

and to practically implement relevant procedures in their local context.

## **Definitions**

**Money laundering:** Money laundering refers to activities designed to conceal the true source of monies. When a person launders money, by definition, they are dealing in money that is reasonably believed to be the proceeds of crime.

**Counter terrorism:** The practice, techniques, and strategy used to combat or prevent terrorism.

**Terrorism financing:** The financing of terrorist acts, and of terrorists and terrorist organisations. The financing of terrorism may include the provision of any kind of asset in any form, including but not limited to—bank credits, travellers' cheques, bank cheques, money orders, shares, securities, bonds, drafts, and letters of credit.

## **Policy**

Assisi recognises that its operations may be viewed as possessing a high level of potential risk for terrorist activities. This is because Assisi conducts activities overseas, and works with, and provides funding, to overseas organisations.

Assisi is committed to adopting a risk-based approach when undertaking new projects and partnerships and will take necessary precautions to ensure that funds and resources are not used to support any terrorist activity or to support individual or organisations that support terrorism, money laundering and any other criminal misuse of funds and resources.

The below approaches are informed by the Australian Government's guidance for non-profit organisations 'Safeguarding Your Organisation Against Terrorism Financing.'

### Counter terrorism in Assisi's work in Australia

- Make all reasonable efforts to ensure that funds are not being directed to terrorist activities and comply with Australian law.
- Ensure the risk of terrorism is included on the organisation's Risk Register.
- Conduct independent financial auditing to provide an assurance that Assisi's accounts accurately reflect the reality of its finances.
- Seek to understand the underlying level of risk in relation to terrorism financing, and take necessary precautions where risk is evident.
- Conduct financial transactions through regulated financial institutions, such as banks or building societies.
- Ensure that Assisi personnel are known, and:

- Conduct background checks on staff, contractors, interns, volunteers and Governing Body members (including Committee of Management and sub-committee members).
- Check that partner organisations, staff, contractors, Governing Body members (including Committee of Management and sub-committee members) and volunteers are not listed on DFAT's Consolidated List; the Attorney-General's List of Terrorist Organisations; and the World Bank's List of Ineligible Firms and Individuals, every six months.

### Counter terrorism in overseas programs supported by Assisi

Through Assisi's overseas work, Assisi works with local partners to:

- Make all reasonable efforts to ensure that funds are not being directed to terrorist activities, and will comply with the laws of all countries it operates in.
- Make all reasonable efforts to ensure partners understand the principles of this policy and support them to apply with laws and practically implement relevant procedures in their local context.
- Include compliance with the Counter Terrorism policy in MoUs with Assisi's partners and assess this risk as part of due diligence checks and partnership capacity assessments.
- Ensure that partner personnel are aware of the level of risk and ensure that appropriate precautions are in place if necessary, including project level risk assessments, and capacity building plans.
- Maintain records of funding that has been provided, who has received it, and the details of any third parties involved.
- Conduct monitoring visits to projects to ensure funding was delivered as intended.
- Request partners provide quarterly financial expenditure reports and that they undertake an annual independent audit and share the audited financial statements with us.
- Make reasonable efforts to understand that funding provided to by Assisi projects to participants will not be misdirected for the purpose of supporting terrorism. This may include finding out whether terrorist organisations operate in the area in which participants are located.
- Conduct financial transactions through regulated financial institutions, such as banks or building societies.
- Ensure that partner personnel are known, and:
  - Conduct background checks on staff, governing body members and volunteers.
  - Every six months, check that the organisation and partner personnel are not listed on DFAT's Consolidated List; the Attorney-General's List of Terrorist Organisations; and the World Bank's List of Ineligible Firms and Individuals.

### Working with third parties or new partners

Assisi will also ensure that it undertakes the necessary due diligence when accepting substantial donations from, or partnering with, new third parties.

Assisi will check that third parties and/or new partners are not listed on DFAT's Consolidated List; the Attorney-General's List of Terrorist Organisations; and the World Bank's List of Ineligible Firms and Individuals.

If Assisi commences a working relationship with a new partner, or engages a third-party organisation in the implementation of its work, Assisi will seek the following information:

- The name and available contact details (e.g., phone numbers, postal address, email and URL addresses).
- The jurisdiction in which the organisation is incorporated or formed. If dealing with an Australian organisation, Assisi will check their details on the ASIC Register.
- Any other names that the organisation operates under.
- A statement of the principal purpose.
- Corporate documents, such as copies of incorporating or other governing instruments, information on the individuals who formed and operate the organisation, and information relating to the beneficiary's operating history.
- Details of other projects/operations/initiatives/commitments, either being undertaken or already conducted by the third party – including information on the participants involved in these actions.
- Any reasonably available information that assures Assisi of the third party's identity and integrity.
- A copy of the last audited financial statements

If the third party is an individual, Assisi will seek the following information:

- Name (including any aliases used), date of birth and contact details (e.g. Phone numbers, postal address, email address).
- Nationality and country of residence.
- The name and contact details of organisations which they operate.
- Details of other projects/operations/initiatives/commitments, either being undertaken or already conducted by the third party – including information on the beneficiaries of these actions.
- Any other reasonably available information that assures Assisi of the third party's identity and integrity.

When engaging suppliers/vendors, Assisi will check that suppliers/vendors are not listed on DFAT's Consolidated List; the Attorney-General's List of Terrorist Organisations; and the World Bank's List of Ineligible Firms and Individuals.

## **How to make a Report**

### Who can report?

Assisi personnel, partner personnel, program participants, or a member of the public can make a report. This can be via Assisi's public complaints mechanism on its website, via email or phone to the Assisi Chief Executive Officer (CEO) or in any other form.

### What to report?

Any suspected or detected risk of funds being misused by individuals and organisations to support terrorist activities, or suspected or detected engagement in, and/or support for, terrorist activities, by Assisi or its partners.

### Making a report

A report can be made directly to the Chief Executive Officer of Assisi. If the incident occurs overseas, a report can be made to the CEO of partner organisations, who will then inform the Assisi CEO within two (2) days.

If reports pertain to questionable behaviour by the Assisi CEO or partner organisation management, reports can be directed to the Assisi President of the Committee of Management, via [president@assisi.com.au](mailto:president@assisi.com.au). If the report is about both the CEO and President, the report should be made to the next appropriate authority within Assisi's Committee of Management.

When a report is made, the following must be recorded:

- Date of report.
- Name of staff taking the report.
- Name of person making the report (though this can be kept confidential throughout the investigation).
- Details of the possible fund diversion or engagement with terrorist activities or organisations. This can include dates/times, persons involved, circumstances surrounding the instance/s and, if known, the value.

Reports can be made in person, through the Assisi website, or via email to [assisi@assisi.org.au](mailto:assisi@assisi.org.au) or via phone number +61 3 90709040.

### Acting on a report

Any suspected, alleged or committed fund diversion to, or engagement with terrorist activities or organisations will be handled discretely and promptly.

If the matter involves DFAT funds, the Assisi CEO is required to report the incident to DFAT immediately.

The CEO will complete a DFAT 'Suspected or Detected fraud – What to Report Form' and send to: [fraud@dfat.gov.au](mailto:fraud@dfat.gov.au).

DFAT and Assisi will then develop and implement a strategy to investigate reports, and where required, recover any DFAT funds or DFAT-funded property acquired or distributed.

If the matter does not involve DFAT funds, the Assisi CEO will conduct the investigation, where appropriate delegating tasks to partner organisations or staff. In the event that the CEO is being investigated, the President may request assistance from other Committee of Management members.

At the conclusion of any investigations, the findings will be presented to the CEO and Committee of Management and appropriate action taken if claims are substantiated. This may include reporting the incident to the police, either in Australia or in overseas country.

The person who originally made the claim should be communicated to in writing with the results of the investigation.

Following a report or investigation a review of activities, procedures and associated risks will be undertaken and appropriate mitigation actions implemented.

## **Responsibilities**

As outlined in the Policy Overview, there are roles and responsibilities that apply to all policies. In addition, the following apply specifically to this policy.

Responsibilities of the Chief Executive Officer:

- Oversee all mitigation activities mentioned in this policy including: background checks for staff, Committee of Management and sub-committee members, volunteers partners, and third parties, and ensuring financial procedures do not support terrorist activity.
- Report any suspicious activity to the Committee of Management, and onwards to DFAT or the Australian Federal Police where appropriate.
- Completing due diligence assessments of partners, including partner capacity assessments.
- Ensuring that MoUs and Project Agreements with partners reflect principles outlined in Assisi's Counter Terrorism policy.

## **Related Documents**

Assisi – Code of Conduct

Assisi – Risk Management

Assisi – Human Resources section

Assisi – Program Manual

ACFID – Code of Conduct

AFP – Money Laundering <https://www.afp.gov.au/what-we-do/crime-types/proceeds-crime/money-laundering>

ASIC – Register <http://asic.gov.au/online-services/search-asics-registers/>

DFAT – Listed Terrorist Organisations <https://www.nationalsecurity.gov.au/what-australia-is-doing/terrorist-organisations/listed-terrorist-organisations>

DFAT – Consolidated List <http://dfat.gov.au/international-relations/security/sanctions/pages/consolidated-list.aspx>

DFAT – ANCP Manual

DFAT – NGO Accreditation Guidance Manual

Department of Home Affairs – Criminal Justice <https://www.homeaffairs.gov.au/about-us/our-portfolios/criminal-justice/crime-prevention/anti-money-laundering-counter-terrorism-financing>

Department of Home Affairs - Safeguarding Your Organisation Against Terrorism Financing <https://www.homeaffairs.gov.au/criminal-justice/files/safeguarding-your-organisation-against-terrorism-financing.pdf>

World Bank List of Ineligible Firms and Individuals <https://www.worldbank.org/en/projects-operations/procurement/debarred-firms>