



ANTI-TERRORISM POLICY

Policy number:	8	Version:	2 (last reviewed on 31 May 2021)
Drafted by:	Finance, Audit and Risk Committee	Approved by Board on:	06 October 2020
Responsible person:	Board of Directors	Scheduled review date	31 May 2023

1. INTRODUCTION

Educating The Future (ETF) Australia Limited renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace terrorism and will make every effort to ensure that its resources are not used to facilitate terrorist activity.

This policy sets out ETF's response to the risk of dealing with individuals and organisations associated with terrorism and Australian Government legislation associated with this.

Relevant legislation can be found in:

- Part 5.3 of the Criminal Code Act 1995 ('the Criminal Code'); and
- Part 4 of the Charter of United Nations Act 1945 ('the UN Charter Act')

Failure to comply with Government requirements could significantly impact the reputation of ETF as well as expose the organisation to potential penalties.

2. PURPOSE

The purpose of this policy is to:

- Articulate ETF's commitment to complying with United Nations resolutions and Australian laws relating to counter-terrorism and avoid involvement in terrorist activities or supporting terrorism in any way
- Establish procedures for all ETF's activities and personnel to avoid any involvement in or support of terrorism activities
- Ensure ETF's operations and activities are accountable, transparent and ethical

3. SCOPE

This policy applies to all volunteers, partners, beneficiaries and affiliated parties as well as all ETF funded projects (both in Australia and overseas), including their management, community members and governing authorities.

4. POLICY

4.1 ETF acknowledges that Australian Government legislation prohibits any dealing with listed terrorist organizations, persons or entities. ETF will adopt measures intended to facilitate compliance with this legislation.

4.2 ETF will confirm the identity, credentials and good standing of the people or organisations it supports and will check that these people or organisations are absent from the Australian Government's terrorism lists.

4.3 ETF will not knowingly remit any funds to known or suspected terrorist organisations or individuals.

4.4 ETF will report any known or suspected terrorist links to the relevant national authority.

4.5 ETF will ensure that overseas recipients of ETF's funds will adopt policies and procedures that enable them to comply with relevant Australian anti-terrorist legislation.

ANTI-TERRORISM PROCEDURES

5. RESPONSIBILITIES

The Educating The Future (ETF) Board is committed to compliance with Australian anti-terrorist legislation to avoid dealing with individuals and organisations associated with terrorism.

The Chairperson will be responsible for ensuring that employees of ETF carry out the following procedures at least annually to minimise the risk of dealing with terrorist organisations.

6. PROCEDURES

6.1 ETF Management must know the identity, credentials and good standing of their partners and recipient organisations (i.e. what they do, where they operate, who are their key decision makers and staff).

6.2 ETF Management are responsible for screening of the Department of Foreign Affairs and Trade consolidated list on an annual basis.

6.3 Care will be taken to transmit funds from ETF using reputable banks and financial institutions.

6.4 ETF's personnel, associates and partners will be trained on ETF's obligations under Australian law and adopt similar measures with respect to funds from Australian sources.

6.5 ETF will immediately withdraw all support, including provision of resources, if it has reason to believe that personnel, associates or partners have breached the requirements of this policy.

6.6 As far as practicable, any funding agreement will include wording that requires the recipient organisation to adopt policies and procedures consistent with Australian Government requirements. DFAT suggested wording is:

“The Organisation acknowledges that the Australian Government has adopted a policy and laws consistent with relevant international counter-terrorism Treaties and UN Security Council Resolution 1373 (2001) of not providing direct or indirect support or resources to organisations and individuals associated with terrorism.

The Organisation must use its best endeavours to ensure that funding provided under this Agreement is expended in a manner consistent with the UN Security Council Resolution and related Australian laws. If, during the course of this Agreement, the Organisation discovers any link whatsoever with any organisation or individual associated with terrorism it must inform the Australian Federal Police and/or AusAID immediately.”

Source: “Guidelines for Strengthening Counter-Terrorism Measures In the Australian Aid Program” (AusAID, September 2004)

6.7 Funding recipients will be required to provide detailed accounting report(s) showing how funds have been spent, at least annually. The accounting report(s) should be subject to review or

audit by an accounting peak body, e.g. Chartered Accountants or Certified Public Accountants. The review should confirm truth and accuracy of the accounting report.

6.8 Prior to funding any organisation, details of funded entities and their office bearers will be compared to Australian Government lists of terrorists and proscribed organisations. The relevant lists can be obtained from:

http://www.dfat.gov.au/icat/UNSC_financial_sanctions.html

6.9 ETF will make any donors aware if a link is found between funds and terrorist-related organisations.

7. POLICY REVIEW

6.1 This policy shall be disseminated through an appropriate directive to all internal ETF stakeholders and necessary persons

6.2 Anti-terrorism within ETF's programs and operations will be monitored on a regular basis, and ETF will communicate and consult with relevant stakeholders regarding our approach to counter-terrorism

6.3 This policy will be reviewed every two years

RELATED DOCUMENTS

1. DFAT's Consolidated List:

<https://www.dfat.gov.au/international-relations/security/sanctions/consolidated-list>

2. Guidelines for Strengthening Counter-Terrorism Measures in the Australian Aid Program, found at:

http://aid.dfat.gov.au/Publications/Pages/3068_5667_7689_8674_4936.aspx

AUTHORISATION

Mr. Adam Alexander Hegedus
Managing Director

