

Counter-Terrorism Policy

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DOCUMENT VERSION

Date	Comments
1 July 2019	Policy drafted.
3 August 2019	Policy approved by the Board.
22 May 2021	Policy approved by the Board

POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English only.

Any suggestions about this Policy should be directed to the Femili PNG Operations Directors, Development Manager or Chief Executive Officer/Senior Social Worker (CEO/SSW) so changes can be considered. When suggestions are raised, the matter will be raised with the Executive Management Committee (EMC) for consideration. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The Operations Directors, Development Manager and CEO/SSW is responsible for maintaining this document; including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table at the top of this page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual eg. shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.

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1. INTRODUCTION

Femili PNG's mission is to work with clients, partners, and communities to improve responses to family and sexual violence (FSV) through our case-management, partner support, training, monitoring, research, and advocacy. Our primary stakeholders include survivors of sexual violence and we are committed to protecting and supporting them.

As a non-governmental organisation, Femili PNG works with partner organisations through funding from government and non-governmental organisations and the public through fundraising. Femili PNG spends these funds in an effective manner to execute our mission. We recognise that there is a level of risk in relation to terrorist financing and this policy seeks to prevent any form of terrorism that might occur wherever possible.

2. SCOPE OF POLICY

This Policy covers both Femili PNG and Friends of Femili PNG. For simplicity, the document will only refer to Femili PNG.

Femili PNG is committed to ensuring that we accurately represent our activities to the people we work with, our donors, and the public. This Policy will apply to all Femili PNG activities and is applicable to all Femili PNG employees and volunteers.

3. PURPOSE

Femili PNG condemns all forms of violence including terrorism and activities related to terrorist financing in relation to its mission. Femili PNG is obligated to ensure that funds and resources sought from donors and the general public are used for their intended purpose, along with being honest and transparent, while being accountable to all stakeholders. This policy states our commitment to complying with ACFID's policy on Financial Wrongdoing and other relevant legislations on Counter Terrorism.

4. CONTEXT

Due to poor transparency and poor rigorous financial management, terrorist financing crimes and activities have been a reoccurring issue among charitiesⁱ. Although the non-for-profit (NFP) sector is at risk of terrorist financing, the Australian Institute of Criminology considers charities to be more vulnerable as the consequences of these crimes are often experienced by the charities involved and its intended recipients who end up not receiving the funds.

Currently, the rating of terrorist financing in the non-for-profit sector in Australia has reportedly reduced to "medium" from "high", when compared with previous assessments between 2012 and 2016, however, there is still a risk of concern and rigorous monitoring of finances is pivotal to preventing these crimes.ⁱⁱ

Charities must ensure that reasonable and effective precautions are undertaken to prevent any deliberate and inadvertent occurrence of terrorist finances and criminal penalties through risk management processes like record keeping, strong internal

controls, ongoing training of employees, volunteers, and partner organisations on terrorist financing.

5. DEFINITIONS

- **Counter-terrorism** - The practice, techniques and strategy used to combat or prevent terrorismⁱⁱⁱ
- **Fraud** - Dishonestly obtaining a benefit, or causing a loss, by deception or other means
- **Listed individuals or organisations** – any individual or organisation which appears on the following lists:
 - The Consolidated List of all persons and entities subject to financial sanctions under Australian sanctions laws (updated regularly on the [DFAT website](#)), and
 - Listed Terrorist Organisations under the Criminal Code (updated on [Australian National Security website](#))
- **Money laundering** - The process of concealing the origin, ownership or destination of illegally or dishonestly obtained money and hiding it within legitimate economic activities to make them appear legal
- **Terrorism** - acts or threats of violence intended to influence the policy of a government, either in Australia or overseas^{iv}
- **Terrorism financing**- The financing of terrorist acts, and of terrorists and terrorists' organisations.^v
- **Terrorist organisation** – any group of terrorists that commits, or attempts to commit, terrorist act by any means, directly or indirectly, unlawfully and wilfully.

6. POLICY AND POLICY PRINCIPLES

Femili PNG will ensure the prevention of terrorism and terrorist related activities is considered in all areas of its operations. In this regard, Femili PNG:

- Maintains a zero tolerance attitude against terrorism and terrorist organisations.
- Will comply with all counter-terrorism laws, policies, and legislation in Australia and PNG.
- Prevents terrorism financing, sanctions violations and money laundering by checking prospective partners against listed individuals or organisations.
- Ensures that any case of terrorist financing and money laundering will be investigated and escalated through the proper reporting channels.

7. PROCEDURES

7.1 Prevention and risk management

Femili PNG will employ the following processes to prevent and mitigate any risks of terrorist financing and other fraud related activities. Femili PNG will:

- Adopt a risk management approach to the prevention, detection and investigation of suspected terrorist activity that is incorporated into its

business process, management practices, internal controls and related activities.

- Assess all funding and partner organisations against the listed individuals and organisations, and document this assessment.
- Monitor business operations for compliance with this policy.
- Commit to training employees and volunteers in ethics, privacy and corruption and terrorism/sanctions awareness activities.
- Provide guidance on preventing terrorist financing, sanctions violation, fraud, and money laundering to partner organisations, where appropriate.
- Staff/Supplier list is checked every two years against the DFAT consolidated list. Given the low-risk nature of Femili PNG's operations in the context of counter-terrorism, suppliers are spot-checked from a sampling based on expenditure amount and overseas links.

7.2 Reporting

At present, Femili PNG does not directly fund partners. However, in the unlikely event that there is a match between a partner organisation and the listed individuals or organisations, Femili PNG:

- Requires that any alleged instances or detected terrorist financing, sanctions violation and fraud must be reported to the Executive Management Committee (EMC) or the chair of the board, and further to DFAT. If the suspected activity relates to a member of the EMC, the detected terrorist activity must be reported to the Board.
- Will immediately cease partnering with, or funding, the organisation or individual.
- Will request the assistance of the Australian Federal Police and DFAT.

8. ROLES AND RESPONSIBILITIES

The EMC is tasked with the responsibility of monitoring this policy and the prevention and detection of all terrorist financing activities.

The Development Manager will be responsible for checking all prospective partners against the listed individuals and organisations, and documenting this check.

Femili PNG will ensure that all employees and volunteers uphold and operate in accordance with this policy.

9. REFERENCES / OTHER POLICIES

This policy must be read and understood in conjunction with other policies:

- Femili PNG Finance Manual
- Femili PNG Anti-Corruption and Anti-Fraud Policy
- Femili PNG Risk Management Framework
- Femili PNG Funding Acceptance Policy
- Femili PNG HR Manual

ⁱ Bricknell, C 2011, *Trends and Issues in Crime and Criminal Justice*, Australian Institute of Criminology.

<https://aic.gov.au/publications/tandi>

ⁱⁱ AUSTRAC, 2017, *National Risk Assessment 2017*, Australian Charities and Not-for-profits Commission (ACNC).

<http://www.austrac.gov.au/sites/default/files/npo-risk-assessment-FINAL-web.pdf>

ⁱⁱⁱ ACFID, 2015, *General Definitions*, Australian Council for International Development.

<https://acfid.asn.au/content/general-definitions>

^{iv} ASIO, 2018, *Counter Terrorism*. Australian Security Intelligence Organisation.

<https://www.asio.gov.au/counter-terrorism.html>

^v APG, 2019, *What is Money Laundering?* Asia/Pacific Group. <http://www.apgml.org/about-us/page.aspx?p=5620f71b-1858-4ca1-85d7-f9eae97210a7>