

Counter-Terrorism Policy GV11

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Drafted by: Executive Director

Responsible person: Board of Directors

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Introduction

This Life has awareness of terrorism related issues and will endeavour to ensure that its activities do not provide direct or indirect support or resources to organisations and individuals associated with terrorism. This Life ensures that relationships with partners are in adherence with the Australian Criminal Code Act 1995 (Cth) and the Charter of the United Nations Act 1945 (Cth) that prescribe that individuals or organisations may face criminal penalties if they provide financial support to a terrorist or criminal individual, organisation or act.

Scope

All associates (Board members, employees, consultants, contractors, volunteers, interns) of This Life, and all associates of This Life's partner organisations are subject to this policy. It is required that if organisations entering into a formal partnership with This Life do not possess a similar policy holding them to equal or higher standards, they commit to adhere to this policy.

Purpose

The purpose of this policy is to outline the ways in which This Life safeguards the organizations activities against terrorism through the following processes and mechanisms;

- Transparency/accountability
- Due Diligence
- Legal Obligations
- Risk Awareness
- Partnership Agreement & Memorandum Of Understandings

Definitions

Terrorism is the use of violence by groups or individuals pursuing political objectives. Terrorists are frequently indiscriminate in their attacks and can deliberately target civilians and non-combatants, often seeking to inflict mass casualties.

Counter-terrorism is the practice, techniques and strategy used to combat or prevent terrorism.

Money Laundering is 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 Financing is intentionally providing or collecting funds and being reckless as to whether those funds would be used to facilitate or engage in a terrorist act.

Policy

In accordance with ACFID Code of Conduct requirements, This Life supports the UN resolution 1373 of 2001, and the subsequent guidelines adopted by the Australian government in relation to overseas aid programs. This resolution calls for all bodies to work together to prevent and suppress terrorist activities through all lawful means possible, prevent any funds reaching these unlawful bodies, and freeze funds going to individuals or groups who commit, facilitate or participate in such activities. Any and all suspicious activities are reported to the appropriate authorities in Cambodia, Australia, and any implicated additional national jurisdictions.

Financial Management

- All financial activities through This Life are documented and monitored through internal accountability measures.
- This Life's financial records are independently audited on an annual basis by External Financial Auditors, in compliance with International Standards on Auditing.
- Financial Policy stipulates that This Life is subscribed to the Department of Foreign Affairs and Trade's Australian Terrorist Asset Freezing Regime.

Monitoring and Evaluation

- Through our Community Research and Consultancy Program we conduct rigorous monitoring and evaluation to ensure transparency and accountability of all programs and projects.
- Follow-up checks are conducted where possible to ensure that assistance was delivered as intended

Due Diligence

This Life takes all necessary steps to reduce the risk of funds being misdirected to terrorist or criminal activity via a third party This includes:

- Making best efforts to confirm the identity, credentials and good standing of third parties and beneficiaries;
- Ensuring that This Life staff, volunteers, Board Members, partners and preferred suppliers are not found on the Department of Foreign Affairs and Trade (DFAT) list of proscribed organisations: http://www.dfat.gov.au/icat/unsc_financial_sanctions.html or the National Security Council; <http://www.nationalsecurity.gov.au/>
- Requiring assurances from the third party (as a pre-condition of funding) that it will not provide funding or make assets available to a terrorist or criminal organisation, in MOU documentation.

Personnel Selection and Recruitment

- In accordance with This Life's Probation Policy, all applicants, Khmer and expatriate will be checked against [DFAT's consolidated list](#) of all persons and entities who are subject to targeted financial sanctions or travel bans. Additionally, the organisations included in their employment history will be checked against the [World Bank Listing of ineligible firms and individuals](#), the [Asian Development Bank Sanctions List](#), the [Attorney General's Department List of Terrorist organisations](#).
- Criminal record/police and terrorist activity checks will be repeated every three years for the duration of the individual's association with This Life.

How to make a complaint or provide feedback

If you would like to provide feedback or lodge a complaint against This Life, a partner, employee, volunteer, or intern you can use the process set out in This Life's Feedback and Complaints Policy.