# COUNTER TERRORISM POLICY

SIGHT FOR ALL
TEACHING THE WORLD TO SEE

## 1. Scope

This Counter Terrorism Policy outlines Sight For All's commitment to ensuring support is not provided to organisations listed as terrorist organisations by the Australian Government. In addition, this policy outlines how Sight For All will ensure partners, personnel and representatives are aware of this policy and meet their obligations as outlined.

**SIGHT FOR ALL ENDEAVOURS TO AVOID INVOLVEMENT IN TERRORIST ACTIVITIES, AVOID SUPPORTING TERRORISM, AND AVOID WORKING WITH ORGANISATIONS THAT SUPPORT TERRORISM.**

Sight For All endeavours to ensure that all expenditure of funds and implementation of projects, including those undertaken by partners in Australia or in-country, comply with relevant Australian Government laws or regulations.

In delivering projects, Sight For All's partners are the teaching hospitals and regional eye departments that are run by Government and governed by Ministry of Health. Projects do not involve the transfer of funds, rather the provision of education, skills, awareness and infrastructure through the four key strategies of Collaborative Research, Sustainable Education, Infrastructure Support and Eye Health Awareness.

This Policy applies to the following Sight For All personnel including: Board Directors, staff, Visionaries, Fellows, Eye Centre Directors, in-country representatives involved with Sight For All projects, partners that have a formal contractual arrangement with Sight For All, contractors and consultants.

## 2. Purpose

Sight For All has a Counter-Terrorism Policy in place for the following reasons:

- It endeavours to ensure that Sight For All and Australian funds and resources are not being used directly or indirectly to support terrorist activities;
- It endeavours to maintain Sight For All and Australia's ability to support sustainable development;
- It endeavours to ensure continued community support for Sight For All's Australian and international projects
- It endeavours to maintain Sight For All and Australia's reputation in delivering sustainable overseas development activities
- It provides clear guidance on what to do if terrorist activity is suspected.

## 3. Definitions

Division 102 of the Commonwealth Criminal Code Act defines 'Terrorist Organisations' as:

a) an organisation that is directly or indirectly engaged in, preparing, planning, assisting in or fostering the doing of a terrorist act: or
b) an organisation that is specified by the regulations for the purposes of this paragraph (see sub-sections (2), (3) and (4).

## 4. Australian Legislation

The Australian Government has passed laws to make it a criminal offence to hold assets that are owned or controlled by a designated terrorist or terrorist organisation. This law is enforced to ensure Australia meets its international obligations under United Nations Security Council Resolutions 1267 (and successor resolutions) and 1373 to freeze the assets of terrorists.

The Australian Government's Department of Foreign Affairs and Trade maintains a consolidated list of all entities and individuals to which the terrorist asset freezing regime applies.

As an Australian organisation, Sight For All is responsible for ensuring no business or activities are conducted with any individual or groups who are on the Consolidated List.

The Australian Government also maintains a list of groups who are prescribed as terrorist organisations under the criminal code. More information, including the list, is available on the National Security Australian website.

https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx

If a group is listed as a 'terrorist organisation,' it is an offence to:

- direct the activities of the organisation
- recruit persons to the organisation
- receive training from or provide training to the organisation
- receive funds from or make available funds to the organisation
- provide support or resources to the organisation.

In addition to checking entities and individuals engaged with Sight For All against the Consolidated List, Sight For All also checks that partner organisations are not listed as a 'terrorist organisation' on the National Security Australia website.

Sight For All develops an understanding of a country's anti-terrorism/anti money laundering/terrorism laws via Country Situational Analysis. These analyses are conducted by Country/Project Officers with support from the International Development Manager

DFAT's document 'Safeguarding your organisation against terrorism financing: A guide for Non-Profit Organisations'.

## 5. Responsibilities

Sight For All's Counter Terrorism Policy is implemented based on the following responsibilities:

- The Bookkeeper checks all personnel, upon their engagement with Sight For All, against the DFAT Consolidated List, Criminal Code Lists, World Bank Listing of the ineligible firms and individuals and Asian Development Sanctions List. Bookkeeper undertakes these checks at least six times per year and reports to each meeting of the Finance, Risk, Remuneration, Audit & Compliance Committee (FRRACC)
- The Bookkeeper checks partner organisations, upon engagement with Sight For All against the terrorist list on the National Security Australia website. These checks are undertaken at the commencement of new projects and annually during the project period.
- The Sight For All Chief Executive Officer communicates the Counter Terrorism Policy with partners via Head and Project agreements
- Upon engagement with Sight For All, Board Directors, Visionaries, Fellows and project participants are provided with a copy of this Counter Terrorism Policy.
- The Sight For All Board of Directors review the Counter Terrorism Policy on a biennial basis
- A section on counter terrorism is included in Good Development Practice Workshops undertaken by Board Directors, staff, Visionaries, Fellows and project participants upon their engagement with Sight For All and on an annual basis
- The Sight For All project team is mindful of counter terrorism throughout the project cycle.
- Sight For All adopts recruitment practices for staff as outlined in the Human Resources Policy. This includes: CV, two interviews, and verbal referee checks. Visionaries and Fellows are recommended to Sight For All.
- Criminal History Record Checks are provided by all Sight For All personnel and updated every 2 years

- Program Management Plans developed by the Country Project Officers at the commencement of projects includes a section on risk management. This includes identifying risks of money laundering and terrorism financing. The International Development Manager supports this process.

## 6. Terrorism Prevention Methods

Sight For All employs the following methods for the prevention of terrorism:

- Ensuring confirmation of the identity, credentials and good standing of the organisations it works in partnership with. The Bookkeeper has responsibility for checking that individuals and project partners are not on the Consolidated List of individuals and entities maintained by the Australian National Security website. This check is undertaken at the point of engagement, or project commencement throughout the year. The Bookkeeper reports the outcome of suck checks at FRRACC meetings.
- A counter terrorism clause is included in Head and Project agreements in place with Ministries of Health and project partners. The Counter Terrorism Policy is included as an appendix to the agreements.
- In most cases, Projects involve the provision of education and infrastructure and not the transfer of funds. When the transfer of funds is required, they are done so in compliance the Transfer of Funds Procedure.
- Donations of ophthalmic equipment are undertaken as part of Sight For All's key strategy of infrastructure support. When equipment is donated, the asset becomes the property of the partner. Equipment that is donated to partners who are Government run hospitals are recorded as being received by partner organisation. The Asset, Acquisition, Maintenance and Disposal Procedure outlines the process for acquiring and donating infrastructure and the reporting requirements for Sight For All and partners.
- A Procurement Policy outlines processes and all purchases are required to have completed an Authority to Purchase Form.
- Sight For All maintains auditable bank accounts for the holding of money donated by the public.
- Budgets are prepared, and records kept to account for any expenses related to specific projects.
- FRRACC reviews financial reports at each FRRACC meeting reports to the Board of Directors.
- The International Development Manager and Country/Project Officers review risk assessments for each project on an ongoing basis.
- All project funds are acquitted at the end of each project by the Bookkeeper and approved by the Finance, Risk, Audit and Compliance Committee.
- Sight For All finances are audited by an external auditor at the end of each financial year.
- Sight For All is a member of the Australian Council For International Development (ACFID) and is a signatory to the ACFID Code of Conduct. As such, Board Directors, staff, Visionaries and those involved with Sight For All projects are required to abide by the Code's nine quality principles.

## 7. Actions in the event of suspected terrorism related activity

As outlined in project risk registers developed for each project, in the event of suspected terrorism, the project or projects taking place in the country concerned are immediately suspended.

Where suspected terrorism involves a Sight For All Board Director, staff member, Visionary, Fellow or project participant, that person's role with Sight For All is suspended while an investigation occurs. Pending the outcome of the investigation, the individual's employment or engagement with Sight For All may be terminated.

Any suspected terrorist activity will be immediately reported to the Australian Federal Police or National Security Hotline (1800 123 400) or through the liaison officers in-country located in the Australian embassies. The report will be made by the Chair or Chief Executive Officer.

The Chair or Chief Executive Officer will notify DFAT immediately if any link is identified between DFAT funds or an Australian Government or assisted organisation and a terrorist organisation.

## 8. Reporting Terrorism

Sight For All Board Directors, staff, Visionaries, Ophthalmic Country Officers, Fellows and volunteers are required to report **in writing** information involving terrorism activities towards Sight For All, **within**

**24 hours**. In the instance when terrorism involves DFAT funded projects, the Sight For All Chair Chief Executive Officer or their delegate will report the incident to DFAT immediately.
In the first instance, the written report should be made to the Chair of the Board or Chief Executive Officer, who may then refer the matter to the police or in-country authorities to conduct an investigation. Sight For All will assist with the investigation as much as possible. The Sight For All Board of Directors will be kept fully informed throughout the process.

## 9. Methods for Reporting Terrorism

Individuals wishing to report an incident of terrorism involving Sight For All can do so in the following ways: -

- Confidentially in writing to the Chief Executive Officer or Board Chair of the Board within 24 hours.
- Confidentially in person with the Country Project Officer, who will liaise immediately with the Chief Executive Officer or Board Chair and compile a written report within 24 hours.

## 10. The Investigation Process

In the instance of the matter being referred to the police or the in-country authorities, Sight For All's investigation into the allegation of terrorism will cease until such time as the police investigation has concluded.

On receiving a report of terrorism, Sight For All's Board Chair or Chief Executive Officer will:

- Record the date and time of all conversations.
- Record and confirm all details of the report.
- Provide written acknowledgement within 48 hours.
- Provide a written report to DFAT if the incident involves DFAT funding immediately. If the incident does not involve DFAT funding, written advice will still be provided.

In conducting an investigation, the Chief Executive Officer or Board Chair will:

- Keep a written record of all interviews undertaken. At the completion of the interview process, the Chief Executive Officer will ensure that those involved will sign the interview record as a true and accurate account.
- Keep all matters and documentation confidential and safely secured.
- Keep all parties involved with the investigation informed of the progress.

## 11. Recording of Information

The Chief Executive Officer will store a summary of information on the Master Register.
This will include:

- Details of the report
- Date and times of interviews
- Action taken
- Outcome

## 12. Following the Investigation

The Board Chair or Chief Executive Officer will notify the Board of Directors and all relevant parties/organisations with the results of the investigation after the investigation has been completed.

## 13. Contact Details

The following contact details are provided for all suspicions relating to the diversion of public or private funds, including DFAT funds, to terrorists should be provided to:

- The National Security Hotline – 1800 123 400
- DFAT Sanctions Section – sanctions@dfat.gov.au
- Transnational Crime Section – transnational.crime@dfat.gov.au

## 14. Staff acknowledgement of policy

This document is distributed to all existing Sight For All Board Directors, staff, Visionaries, volunteers, Fellows, project participants and consultants, upon commencement of their engagement with Sight For All. Counter terrorism is included in Good Development Practice Workshops.

## 15. Related Documents

Sight For All Anti-Fraud and Corruption Policy
Sight For All Code of Conduct Policy
Sight For All Criminal Record Check Policy
Sight For All Delegations of Authority Policy
Sight For All Financial Risk Management Policy
Sight For All Fundraising Policy
Sight For All Governance Policy
Sight For All Human Rights Policy
Sight For All Incident Investigation and Reporting Policy
Sight For All Partner Engagement and Collaboration Policy
Sight For All Recruitment and Selection Procedure
Sight For All Risk Management Policy
Sight For All Risk Management Procedure
Sight For All Staff and Visionary Safety and Security Policy
Sight For All Termination of Employment Policy
Sight For All Transfer of Funds Overseas Procedure
Sight For All Volunteer Policy
DFAT Safeguarding your organisation against terrorism financing – A guide for non-profit organisations
https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx
Australian Government Consolidated List
https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx
National Security Australia list
Commonwealth Criminal Code Act
https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx
Consolidate List
https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx

## 16. Review

The Sight For All Counter Terrorism Policy is reviewed on an biennial basis.

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ADDENDUM A

## Counter Terrorism Reporting Process

The process is to be followed in responding to report of counter terrorism: