



COUNTER TERRORISM POLICY

ORGANISATION:	Kokoda Track Foundation
ACN:	103 660 948
POLICY TITLE:	Counter Terrorism
VERSION:	4.0
STATUS:	Final
ALLIED POLICIES / PROCEDURES:	Code of Conduct Partnership Policy Partnership Management Procedure Financial Risk Management Policy Financial Controls Policy Fraud & Corruption Prevention Policy Human Resources Policy Whistleblower Policy
OWNER:	Senior Management
APPROVED BY:	CEO
LAST UPDATE:	30.05.2019
NEXT REVIEW DATE:	30.05.2021

INTRODUCTION:

Kokoda Track Foundation (KTF)'s Counter Terrorism Policy outlines the organization's commitment to taking all reasonable efforts towards ensuring that it does not provide support to organisations that are listed by the Australian Government as terrorist organisations or engage any personnel with links to terrorism.

PURPOSE:

To articulate KTF's commitment to avoid involvement in terrorist activities, avoid supporting terrorism, and avoid working with organisations that support terrorism.

SCOPE:

This policy applies to all KTF board directors, staff, volunteers, interns, representatives and contractors, as well as all partner organisations and their directors, staff, volunteers, interns, representatives and contractors.

BACKGROUND:

As a not-for-profit organization operating overseas, there is a risk of KTF being misused by individuals or other organisations to finance or support terrorist activity. A Counter Terrorism Policy ensures that KTF's funds and resources are not used, directly or indirectly, to support terrorist activities and to provide a clear guide on what to do if terrorist activity is suspected. Furthermore, this policy will maintain KTF's ability to support sustainable development and reputation in delivering sustainable overseas aid, as well as ensure continued community support for its overseas aid projects.

POLICY:

To exercise diligence in relation to counter-terrorism, KTF will:

- Confirm the identity, credentials and good standing of the people or organisations that it employs or engages, directly assists or partners with;
- Check that the people or organisations that it employs or engages, directly assists or partners with are not on the lists maintained by the Australia Government (Attorney-General Department's List of Terrorist Organisations and Department of Foreign Affairs and Trade's Consolidated List);
- Check that the people or organisations that it employs or engages, directly assists, or partners are aware of and obliged to comply with the relevant Australian laws and KTF's counter terrorism policy and that they in turn are obliged to ensure that their distribution of funds or resources is made on the same basis
- Conduct regular monitoring to ensure that people of organisations that it directly assists and / or partners are not on the lists maintained by the Australian Government (as outlined above)

To report suspected terrorism-related activity, KTF will:

- Report any suspected terrorism-related activity to the Australian Federal Police or the National Security Hotline (on 1800 123 400) or through their liaison officers in Papua New Guinea
- Notify DFAT immediately if any link between DFAT funds or a DFAT assisted organisation and a terrorist organisation is discovered

To demonstrate reasonable efforts to ensure funds are not being directed to terrorist activities, KTF will:

- Develop and maintain records of program budgets, income and expenditure that account for all program expenses
- Produce quarterly and annual financial statements that provide detailed breakdowns of incomes and expenditures
- Monitor quarterly financial statements by the Finance, Audit and Risk Management Committee and the Board
- Have an annual audit of financial statements undertaken by an external auditor

RESPONSIBILITIES:

It is the responsibility of the Board, with the assistance of the CEO and senior management, to:

- Ensure that KTF staff, volunteers, interns, representatives and contractors comply with all relevant legislation and KTF policies (including this one);
- Ensure that all partner organisations and their directors, staff, volunteers, interns, representatives and contractors comply with all relevant legislation and KTF policies (including this one);
- Approve activities and funding only when the requirements of this policy have been met.

PROCEDURES:

- This policy will be included in KTF's Policies Manual and will be tabled as part of all new staff, directors and volunteer, intern and representative induction
- Counter Terrorism due diligence and checks to be undertaken in line with KTF's Human Resources Policies and Volunteer Management Policies, and all personnel (employees, directors, volunteers, contractors and others) to undergo due diligence checks. In line with KTF's Human Resources and Child Protection Policies, all staff, directors and volunteers will be required to undertake counter terrorism screening as well as police / working with children checks.
- This policy will be included in KTF's Memorandums of Understanding with partner organisations. All partner organisations will be screened for terrorism-related links and activities via KTF's Partner Capacity Assessment process
- All of KTF's development activities will be monitored to ensure they are not in breach of this policy. Monitoring will be proportionate to the amount of funding and the risk of breach and will be recorded in the project file. Monitoring to include at least one country visit annually.

END