



COUNTER-TERRORISM POLICY
Approved by Board: 15 May 2018
Next Review Date: May 2019

Managed on behalf of the CEO and Board by: Program Manager

*Revisions to this version are identified on the last page

1. Purpose of this Policy

This policy sets out Interplast Australia & New Zealand's (Interplast's) commitment to comply with Australian laws relating to counter-terrorism through processes and policies that minimise the risk of support for terrorists and terrorist organisations, especially those on the Australian Government's Consolidated List and List of Terrorist Organisations.

2. Scope of the Policy

This policy applies to the following people:

- Interplast staff members, contractors and consultants;
- Interplast volunteers¹;
- Interplast Board of Directors;
- Partner organisations²; and
- Observers/visitors accompanying an Interplast activity.

3. Legislative Framework and Standards

To meet Australia's international obligations under United Nations Security Council Resolutions 1267 (and successor resolutions) and 1373 to freeze the assets of terrorists, the Government has passed laws that make it a criminal offence to hold assets that are owned or controlled by terrorist organisations or individuals, or to make assets available to them.

Interplast also adheres to part 5.3 of the Australian Criminal Code Act of 1995 that refers to controlling funds and assets from non- or suspected terrorist organisations.

The Department of Foreign Affairs and Trade (DFAT) maintains a Consolidated List of individuals and groups to which this terrorist asset freezing regime applies. This list can be accessed on the DFAT website: www.dfat.gov.au. Australian

¹ Volunteers include both medical volunteers (surgeons, anaesthetists, nurses and allied therapists) undertaking an activity overseas or participating in professional development in their own country or overseas and non-medical volunteers, such as those in administrative, promotional or fundraising roles.

² Partners are individuals, groups of people or organisations that collaborate with Interplast to achieve mutually agreed objectives in development activities.

organisations are responsible for ensuring they do not work with any individual or groups listed on the Consolidated List.

In addition to the Consolidated List, the Australian Government maintains a list of groups that are proscribed as terrorist organisations under the Criminal Code. This List of Terrorist Organisations can be accessed on the National Security Australia website: www.nationalsecurity.gov.au. If a group is listed as a terrorist organisation on this website, 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; and
- provide support or resources to the organisation.

Interplast is guided by the Attorney General's Department's *Safeguarding your organisation against terrorism financing: A guidance for non-profit organisations* document to ensure compliance with Clause 6.4 of the Head Agreement, which states that any contracts entered into with "delivery partners" include anti-terrorism requirements.

4. Policy Statement

Interplast will promote and implement best practice principles to safeguard against misuse of funds for terrorist purposes, including the careful assessment of potential in-country partners to ensure they have no links to proscribed entities or individuals.

Interplast will advise its partners of counter-terrorism risks and appropriate action to be taken if identified.

Interplast and its partners will utilise internationally accepted accounting practices verified by regular, independent audits

5. Policy in Practice

This policy will be embedded within Interplast's organisational culture and practices:

- a) Through its pre-appraisal process, Interplast undertakes checks to help ascertain that all prospective partners do not engage in terrorist activities or have links with identified terrorists or terrorist organisations (such as those on the Consolidated List or the List of Terrorist Organisations). If such links were identified, Interplast would not work with this potential partner.
- b) Interplast will address the issue of anti-terrorism with partners during the development of relevant Memorandums of Understanding (MoUs) and partner agreements. Where relevant, requirements relating to this issue will be noted in written agreements.

- c) Interplast will regularly check the Consolidated List and List of Terrorist Organisations and update partners about relevant changes to those lists.
- d) Through the monitoring and evaluation of activities, both Interplast and its partners will ensure funds are being used for approved program activities.

6. Monitoring and Review of Policy

This policy will be monitored and reviewed in line with the process outlined in the Policy Framework. The Program Manager is accountable to the CEO and Board for managing and maintaining this policy.

Where compliance issues are identified, the Program Manager will work with staff and other relevant stakeholders to address these issues promptly.

Any updates and revisions to this policy must be endorsed by the Program Manager and CEO before being submitted to the Interplast Board for its approval. Policy changes will be reflected, as necessary in updated operational manuals.

***Revisions to Counter Terrorism Policy**

Nature of proposed revisions	Date on which CEO endorsed	Date on which Board approved
Initially Approved		September 2006
Minor changes	10 October 2012	16 October 2012
Minor grammatical, spelling and wording changes. Changed from 'Senior' Program Activities Coordinator to 'designated' Program Activities Coordinator	9 October 2013	15 October 2013
Minor grammatical, spelling and wording changes including changing 'AusAID' to DFAT.	4 June 2013	17 June 2014
Minor wording changes	20 April 2015	12 May 2015
Minor wording changes relating to staff responsibility for the policy	28 April 2016	10 May 2016
Replacement of 'DFAT' with the Attorney General's Department's regarding the Safeguarding your organisation against terrorism financing: A guidance for non-profit organisations document Inclusion of reference to Australian Criminal Code Act of 1995	4 May 2017	16 May 2017
Minor additions within Policy in Practice	9 May 2018	15 May 2018

This Policy will be reviewed and adjusted, as required, by the CEO, staff and Board on an annual basis.