

AUSTRALIAN DOCTORS FOR AFRICA

Policy: COUNTER TERRORISM

Date approved: 04/19

Date of next review: 11/20

Approved by: Board of Management

1.0 PREAMBLE

ADFA and its staff and volunteers avoid involvement in criminal and terrorist activities, avoid supporting terrorism and avoid working with organisations that support terrorism. As a non-profit organisation operating in Africa ADFA endeavours to:

- ensure that ADFA / Australian funds and resources are not being used, directly or indirectly, to support terrorist activities;
- ensure that ADFA operates within the law;
- maintain continued community support for ADFA projects; and
- maintain ADFA's / Australia's reputation in delivering sustainable overseas aid.

2.0 PURPOSE AND SCOPE

2.1 Purpose

Terrorism and money laundering are against the law, against Australia's national interests and undermines sustainable development. ADFA may face criminal penalties if it provides financial or other support to a terrorist act, individual or organisation.

2.2 Scope

This policy applies to all staff, office bearers and volunteer staff of ADFA, as well as to all those with whom ADFA has professional dealings.

This counter terrorism policy is included in information provided to all medical trip team leaders participating in working trips.

3.0 POLICY STATEMENT

3.1 Volunteers / Medical Teams

ADFA accreditation processes meets all Department of Foreign Affairs and Trade (DFAT) security requirements to screen volunteers, including the collection of suitable documentation.

3.2 Aid Recipients

Prior to approving aid to a recipient organisation an officer of ADFA must assure the BOM that:

- the identity, credentials and good standing of the people or organisations that ADFA directly assists have been confirmed; and
- the people or organisations that ADFA directly assists are not on the lists maintained by the Australian Government as set out in the reference documents below.

Staff will conduct spot checks to ensure the people or organisations that ADFA directly assists are not on either list.

Prior to authorising expenditure for new projects the BOM must ensure that the people or organisations that ADFA directly assists have been made aware of and are obliged to comply with the relevant Australian laws and ADFA's counter terrorism policy, and that they in turn are obliged to ensure that their distribution of the funds or support is made on the same basis. That is to say that these people or organisations directly assisted will take all necessary measures to not directly or indirectly support terrorism.

3.3 Reporting Suspected Terror Related Activity

The team leader must notify ADFA and DFAT immediately if they suspect a link to any criminal/criminal organisation or terrorist/terrorist organisation.

Any suspected terrorism related activity must be reported immediately to the Australian Federal Police or the National Security Hotline on 1800 123 400 or through the liaison officers located in Australian embassies:

Madagascar: PO Box 541, Port Louis, Mauritius, ph: +230 202 0160

Somaliland: PO Box 39341-00623, Nairobi, Kenya, ph: +254 20 4277 100

Ethiopia: PO Box 3715, Addis Ababa, ph: +251 116 672 678

Comoros: PO Box 541, Port Louis, Mauritius, ph: +230 202 0160

3.4 Financial Transparency

ADFA maintains the transparency and accountability of its organisation and activities by having internal controls in place which ensure that funds are fully accounted for and spent in a manner consistent with the stated purpose. These controls include:

- operating a separate bank account for the holding of monies donated by the public;
- developing and keeping records of program budgets that account for all program expenses;
- producing annual financial statements that provide detailed breakdowns of incomes and expenditures; and
- having an annual audit undertaken by an external auditor.

4.0 REFERENCES

4.1 Associated Documents

- Policy - Authorising of Expenditure
- Policy – Financial Management
- Policy – Human Resource Management
- Policy – Code of Conduct

4.2 Reference Documents

- The Criminal Code Act 1995 (Cth) sets out criminal penalties (up to life imprisonment) for providing support intentionally or recklessly by 'getting funds to or from a terrorist organisation' (section 102.6), 'providing support to a terrorist organisation' (section 102.7) and 'financing terrorism (section 103.1), and Division 400.
- The Charter of the United Nations Act 1945 (Cth) sets out penalties for making assets available to a proscribed person or entity.
- For the purposes of that legislation, two lists are maintained by the Australian Government that identify terrorist organisations under the Criminal Code and persons and entities who are subject to targeted financial sanctions or travel bans under Australian sanctions law:

- <https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx>
- <http://dfat.gov.au/international-relations/security/sanctions/pages/consolidated-list.aspx#list>
- UN Security Council Resolutions relating to terrorism, including UNSC Resolution 1373 (2001) and 1267 (1999) and related resolutions.

4.3 Acknowledgements

Parts of this policy have been adapted from the Royal Australasian College of Surgeons.