



Purpose

This policy commits GMP Extend, its implementing partners and associates to comply with Australian laws relating to counter-terrorism through policies and processes that seek to minimise and mitigate the risk of support for terrorists and terrorist organisations in either a direct or indirect manner.

Scope

This policy applies to the following:

- GMP Extend staff, volunteers, contractors and consultants
- GMP Extend Board of Directors and members
- Partner organisations
- Members of any Partner Visit Teams

Relevant Legislation

To ensure that Australia fulfils obligations under United Nations Security Council Resolution 1373, the Australian Government has enacted legislation that makes it a criminal offence to hold assets that are owned or controlled by terrorist organisations and/or individuals, or to make assets available to them.

The Department of Foreign Affairs and Trade (DFAT) maintains a Consolidated List of individuals and groups that have been identified as terrorists or terrorist organisations. Access to this list is via the DFAT website (www.dfat.gov.au). Australian individuals and organisations are responsible for ensuring they do not work with or support in any manner, an individual or group contained in the Consolidated List.

GMP Extend will

- Assess terrorism-financing risks prior to commencing programs and activities;
- Conduct due diligence assessments on suppliers and delivery partners prior to engagement;
- Require partners and suppliers to manage terrorism-financing risks in line with Australia's counter-terrorism financing laws and other relevant laws and obligations;
- Manage terrorism-financing risks during project design, implementation and delivery;
- Conduct checks to ensure terrorism-financing risks are being appropriately managed; and
- Oblige partners, suppliers and staff to report allegations, suspicions and cases of terrorism-financing.

In addition to the Consolidated List, The Australian Government maintains a list of groups that are proscribed as terrorist organisations under the terms of the Criminal Code. It is an offence to interact with these groups in the following ways:

- Direct the activities of the organisation
- Recruit persons to the organisation
- Receive training from or provide training to the organisation
- Receive funds from or to make funds available to the organisations; and
- Provide support or resources to the organisation

Policy Statement

GMP Extend will implement best practice strategies to minimise and mitigate the risk of financial and material resources being used to directly or indirectly support terrorist individuals or entities named in the above Lists.

GMP Extend will advise its partners that they are required to identify terrorism risks and act to mitigate any identified risk. GMP Extend will assist partners to develop policies and procedures to comply with these requirements.

GMP Extend will implement best practice accounting methods to minimize and mitigate terrorist support risk and will require commensurate actions from partners in line with their organisational capacity.

Procedures

1. Australian staff, volunteers, Board Members and Associate Partner Program Managers will complete a National Criminal Check every three years.
2. Australian staff, volunteers, Board Members will be checked against the Proscribed Lists as part of their induction and then annually.
3. Key partner staff will be checked against the above Lists at least every six months and more often when the National Terrorism Public Alert is above medium. Key staff are: the program manager and contact person named in the project design, any other senior staff, staff that handle funds, and the members of the Board of governance and any associated committees.
4. Where an individual or entity is identified as being on one of the Proscribed Lists, the Executive Officer will be informed as a matter of urgency and urgent corrective action taken, including immediate suspension of funding, confirmation of the identify of suspects and informing DFAT.
5. During the formation of new partnerships, the following actions will be taken:
 - a) Key staff as listed above will be checked against the above Lists.
 - b) The requirement to identify terrorism risks and act on any identified risks will be discussed with the partner.
 - c) The requirement to identify terrorism risks and act on any identified risks will be documented in the Partnership Agreement.
6. Project design and appraisal processes will ensure that proposed program activities do not directly or indirectly support terrorism.
7. Project confirmation and payment advice forms will require partners to re-affirm their commitment to mitigate against the risks of resources being used for terrorism.

8. Project reports, monitoring and evaluation will ensure that funds are being used only for approved project activities. Deviations from original design will be documented, including reference to the perspective of fraud, corruption and counter terrorism.
9. Partners will be required and assisted to develop a counter-terrorism policy which includes a commitment to:
 - a) Identify the risks of terrorism in their context.
 - b) Take action to reduce any identified risks.
 - c) Reduce to a minimum the risk of financial and material resources being used for terrorism.
 - d) Provide GMP Extend with changes of personnel listed in 3 above within 1 month of the change.
 - e) Inform GMP Extend within 7 days of any suspected use of resources for terrorist activity by staff or project participants.