



MARY WARD INTERNATIONAL AUSTRALIA

COUNTER-TERRORISM POLICY

1. Introduction

Mary Ward International Australia (MWIA) strongly opposes all forms of terrorism and terrorist-related activities as incompatible with the goals and philosophy of sustainable development and the upholding of universal human rights. MWIA is committed to reducing the risk of MWIA funds being misused for the support of any terrorism activities through the continuous review and strengthening of governance arrangements and internal controls.

This policy has been developed in alignment with:

- United Nations Anti-Terrorism protocols;
- Australia's counter-terrorism laws: [Australia's counter-terrorism laws](#);
- The Australian Charities and Not-for-profit Commission's (ACNC) advice on protecting charities against the risk of terrorism financing: [ACNC Protection Against the Risk of Financing Terrorism](#);
- The Australian Council For International Development's (ACFID) Code of Conduct Guidelines on controlling funds and resources: [ACFID Control of Funds and Resources](#); and
- The Overseas Aid Gift Deduction Scheme (OAGDS) Guidelines: [OAGDS Guidelines](#).

2. Purpose

The purpose of this policy is to:

- reduce the risk of MWIA funds being misused for the purposes of terrorism.
- reduce the risk of MWIA becoming involved with persons or organisations advocating or engaging in terrorist activities.

3. Scope

This policy applies to MWIA Company members, Board directors, Committee members, employees, volunteers, partners and other stakeholders who operate under the auspices of MWIA.

4. Definition

A terrorist act is an act, or a threat to act, that intends to coerce or influence the public or any government by intimidation to advance a political, religious or ideological cause. It can cause one or more of the following:

- death, serious harm or danger to a person;

- serious damage to property;
- serious risk to the health or safety of the public;
- serious interference with, disruption to, or destruction of critical infrastructure such as a telecommunications or electricity network.

5. Policy statement

MWIA recognises that any form of terrorism is incompatible with MWIA's values as well as the goals and philosophy of sustainable development. MWIA recognises its legal and ethical responsibility to take all reasonable precautions to ensure that its funds are not directed towards terrorism.

In accordance with this commitment, MWIA will:

1. Ensure that potential supporters and partners do not appear on any database of recognised terrorist individuals or groups. Databases consulted include:
 - nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx; and
 - dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx#list
2. Ensure that MWIA does not provide support to individuals and organisations associated with terrorists or contravene Australian sanctions laws.
3. Terminate project partnerships immediately if there is well-founded suspicion or demonstration of links with any organisations or individuals associated with terrorism or terrorist-related activities.
4. Act with due diligence to know the partners who are carrying out MWIA activities or supporting MWIA with funds and asset transfers.
5. Discuss terrorism risks and management procedures with partners and verify that they undertake terrorism and sanction screening of key downstream partners or suppliers receiving funds.
6. Ensure that the risks unique to MWIA, including the risk of terrorist financing in locations where it operates, are clearly understood.
7. Report suspicious activity to the Australian Federal Police.

6. Responsibilities

The MWIA Board has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place.

The MWIA EO is responsible for:

- Ensuring that appropriate control and risk management mechanisms are in place to mitigate the risk of its funds or activities being misused for the purposes of terrorism.
- Dealing with and investigating any reports of funds or activities being diverted for the purposes of terrorism.

MWIA staff are responsible for reporting suspicious activity to the EO.

Responsible Person	Date Created	Scheduled Review date
MWIA Board	2012	August 2023
Contact	Version	Status
Hannah George (Executive Officer)	2.1	Final
Authorisation name	Authorisation signature	Date of authorisation
Dr Leoni Degenhardt AM (Chair)		7 October 2021

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COUNTER-TERRORISM

PROCEDURES



Processes

In keeping with ACNC governance and external conduct standards, MWIA undertakes to do the following:

1. Check that potential project partners, contractors, donors and supporters are not connected to terrorist individuals or cells by consulting databases such as:
 - nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx; and
 - dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx#list
2. Keep financial and operational records up-to-date, including records of activities and the details of any third parties involved in MWIA operations.
3. Establish financial controls with project partners that promote transparency and accountability.
4. Conduct financial transactions through regulated financial institutions such as banks or building societies.
5. Conduct follow-up checks where possible to ensure that the assistance was delivered as intended.
6. Monitor potential risk factors and address their mitigation.
7. Provide clear guidelines for reporting any suspicious activity to the EO and/or the Australian Federal Police.

Reporting a suspected act of terrorism

All those operating under the scope of this policy have a responsibility to report suspected acts of terrorism regardless of how the situation came to their attention. This not only allows individual cases to be investigated but drives the improvement of MWIA's risk management practices as required in the *Loreto Risk Policy*.

The protocols used to report a suspected act of terrorism are the same as those outlined under Section 6 of the *MWIA Financial Wrongdoing Policy* and can be found at [MWIA Policies](#).

CONTACT DETAILS FOR REPORTING A SUSPECTED BREACH OF THIS POLICY

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Related documents

- MWIA Financial Wrongdoing Policy
- Loreto Risk Policy