

ANZGITA POLICY for

Counter Terrorism and Sanctions Observance in International Activities

1. PURPOSE AND SCOPE

The Australian and New Zealand Gastroenterology International Training Association (ANZGITA) is aware of the terrorist and sanctions contravention risks presented by working in international aid and development. This policy describes ANZGITA's efforts to avoid and counter terrorism and not contravene sanctions. It sets out measures designed to prevent the misapplication of ANZGITA funds and the distortion of ANZGITA activities through terrorism and terrorist organisations.

The policy applies to any paid or unpaid individuals who participate in the ANZGITA's activities. This includes all staff employed by ANZGITA in the future, in-country program staff and volunteers.

2. BACKGROUND

ANZGITA recognises that terrorism threatens poverty reduction, healthcare improvement and stability in the Asia Pacific region and impacts on Australia's security and prosperity. Training and development resources from ANZGITA and other not-for-profit organisations may be vulnerable to misuse by individuals or other organisations to finance or support terrorist activity.

3. GUIDING PRINCIPLE

ANZGITA will make all reasonable efforts to ensure that funds are not being directed to terrorist activities or to individuals or organisations linked with terrorism. ANZGITA, its projects, staff and volunteers, will comply with the relevant Commonwealth, State and Territory laws, specifically:

- Part 5.3 of the Commonwealth Criminal Code Act 1995;
- Autonomous Sanctions Act 2011 (Cth); and
- Part 4 of the Charter of the United Nations Act 1945
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)

ANZGITA, its projects, staff and volunteers, will comply with all the laws of any foreign countries in which it operates.

4. RISK ASSESSMENT

ANZGITA recognises the risks associated with conducting and contributing to aid programs and projects overseas. The current practices, risk assessments and financial safeguards described in this policy are designed to ensure an absolute minimum level of risk. This policy is reviewed every three years, but may be amended more frequently as and where necessary to respond to newly identified risks and legal requirements. The ANZGITA Quality and Risk Board Committee is responsible for periodically assessing the implementation of this policy and of proposing any necessary changes the Board.

5. MEASURES

ANZGITA will ensure this policy is available to all staff, volunteers and associates. It will be available online at www.anzgita.org.

ANZGITA management will exercise due diligence in selecting and enabling funding for international projects and volunteers.

ANZGITA will regularly confirm that beneficiaries and/or third parties receiving funding through ANZGITA are not identified terrorist individuals or organisations. In order to do this, ANZGITA will consult the following sources for individuals or organisations receiving funding:

- Department of Foreign Affairs & Trade 'Consolidated List' of persons and entities subject to a targeted financial sanction imposed by resolution of the United Nations Security Council. (<http://www.dfat.gov.au/sanctions/consolidated-list.html#financial>)
- The Attorney-General's Department 'List of Terrorist Organisations', proscribed as terrorist organisations under Division 102 of the Criminal Code 1995. (<http://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx>)

Where funds are provided to a third party or a third party is contracted to work or volunteer for ANZGITA and/or any of its projects, ANZGITA will:

- make best efforts to confirm the identity, credentials and good standing of third parties, including, where appropriate, obtaining police and reference checks;
- require assurances from the third party that it will not provide funding or make assets available to a terrorist organisation; and
- make all reasonable efforts to ensure the third party is aware of, and seek assurance that the third party will comply with, all applicable laws.

With respect to ANZGITA and other overseas engagements, ANZGITA will continue to deploy best practices in the financing and management of resources. ANZGITA:

- conducts financial transactions where possible through regulated financial institutions.
- maintains oversight of all its international projects and keeps records of assistance provided, beneficiaries and any third parties involved;
- conducts follow-up checks (including in-country reports, internal and external audits) to ensure assistance is delivered as intended and financial records are accurate; and
- will report suspicious activity to the relevant funding body and/or the Australian Federal Police, as required.

ANZGITA will itemise the risks associated with terrorism financing and sanctions contravention and the actions taken to mitigate them in the organisation's risk register. Performance against those actions and the periodic review of risks and mitigation actions will be undertaken by the Quality and Risk Committee and reported to the Board.

External References

Safeguarding your organisation against terrorism financing- A guidance for non-profit organisations, 2014, Australian Government

<http://www.nationalsecurity.gov.au/Informationforbusiness/Pages/Terrorismfinancing>)

AUSTRAC report on Terrorism Financing in Australia

<http://www.austrac.gov.au/publications/corporate-publications-and-reports/terrorism-financing-australia-2014>

Approved by Board of Directors.

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