

PROTECTION AGAINST TERRORISM POLICY

SCHOOL FOR LIFE FOUNDATION AUSTRALIA

INTRODUCTION AND PREAMBLE

School for Life Foundation Australia was incorporated on 12 December 2008 under the *Corporations Act 2006* (Cth).

The objectives of the Association are:

- (1) to provide and facilitate development and/or relief activities for necessitous persons in developing countries as published from time to time by the Minister for Foreign Affairs, working in partnership with indigenous organisations in the developing countries;
- (2) to enable and facilitate the access, by disadvantaged youth in poverty-stricken and remote areas of the developing world, to education and skills training;
- (3) to create sustainable and long-lasting change;
- (4) to generate opportunities that will benefit local business, provide local opportunities and encourage community involvement in order to strengthen knowledge and skills; and
- (5) to act as the trustee for a developing country relief fund which has been endorsed under s 30-85 of the Tax Act as a deductible gift recipient.

VISION STATEMENT REGARDING OUR PROTECTION AGAINST TERRORISM POLICY

INTRODUCTION

As a not-for-profit organisation, School for Life Foundation Australia recognises the potential risks of having its resources and activities exploited by terrorist organisations in financing or supporting terrorist activities. School For Life Foundation Australia is committed to adopting the Australian Government Best Practice Principles for not-for-profit organisations (NPOs) by which NPOS can reduce this risk as well as ensuring that all School For Life Foundation Activities are not in any way associated with organisations directly or indirectly involved in terrorist activities.

PURPOSE OF THE POLICY

The purpose of this document is to provide a framework for School For Life Foundation Australia in dealing with terrorism and related issues.

POLICY AND PROCEDURE

School For Life Foundation Australia will take all reasonable efforts to ensure that its funds and activities are not directed towards any terrorist activities or any entities conducting such activities.

Without limitations, this includes:

1. Remaining compliant with all relevant State and Commonwealth laws of Australia in relation to anti-terrorism, including but not limited to:

Anti Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
Criminal Code Act 1995 (Cth)
Charter of the United Nations Act 1945 (Cth)

2. Taking reasonable steps to be aware (and training staff and volunteers in being aware) of any risks in relation to terrorism funding that School For Life Foundation Australia may be exposed to within its operations around the world and taking necessary precautions where such a risk is evident.
3. Taking reasonable steps in identifying all beneficiaries and third parties with whom School For Life Foundation Australia works.

Without limitation, this involves:

(i) checking the:

- (a) 'Consolidated List' of all persons and entities subject to targeted financial sanctions under the United Nations Security Council decisions and maintained by the Department of Foreign Affairs and Trade pursuant to Regulation 40 of the *Charter of the United Nations (Dealing with Assets) Regulations 2008*;
- (b) 'List of Terrorist Organisations' being the list of organisations proscribed by the Australian Government as "terrorist organisations" under Part 2 of the *Criminal Code Regulations 2002 (Cth)*.

(ii) Conducting any additional background checks as necessary to confirm the identity and integrity of a beneficiary or third party, such as:

- a. Designating a staff member the role of media and political awareness relating to terrorism, including conducting a daily check of media reports, and conducting searches through the Department of Foreign Affairs and Trading website.
- b. Conferring with:
 - i. International bodies such as the United Nations or the World Health Organisation
 - ii. Other Australian Aid Organisations through word of mouth, direct request, or by any other means

For the purpose of obtaining any available lists of information relating to known or suspected terrorist organisations.

Actively attending any seminars conducted on the topic of terrorism and terrorist organisations.

Organising a computer alert to be activated to prevent making a payment to a known terrorist organisation.

4. In ensuring proper identification methods of beneficiaries and third parties, School For Life Foundation Australia will seek to collect and maintain the following information (supported by relevant identification documents) on beneficiaries and third parties with whom it deals:
 - (a) Names (including any aliases used), contact details
 - (b) In relation to individuals, the date of birth and nationality
 - (c) Details of current projects, operations, commitments or involvements being conducted or undertaken and the beneficiaries or third parties involved in same.
 - (d) In relation to organisation or companies:
 - i. The objects or mission statement as recorded in governing documents
 - ii. Copies of governing documents (where available)
 - iii. The details as set out in (a) and (b) above in respect of the representatives of the company or organisation.
5. Where it is not practicable to identify each beneficiary at a specific individual level, School For Life Foundation Australia is committed to ensuring and maintaining an understanding of the particular group of beneficiaries such as the community, village, town or region (as the case may be) that is being assisted.
6. In relation to funding, money retained by School For Life Foundation Australia will be scrupulously accounted for in accordance with normal practice followed by financial institutions in maintaining accounts.
7. When dealing with an Overseas Aid Agency School For Life Foundation Australia must also ensure that they obtain a written agreement requiring that the Overseas Aid Agency:
 - i. complies with applicable domestic and international laws concerning counter terrorism financing and anti-money laundering legislation;
 - ii. will not direct funding to a terrorist organisation or sanctions designated person or entity.

RESPONSIBILITIES

School For Life Foundation Australia is responsible for adopting this policy.

The School For Life Foundation Australia Board and all staff members, contractors and volunteers are responsible for the implementation of this policy.

School For Life Foundation Australia's Board is responsible for reviewing this policy as and when the need arises.

DEFINITIONS

- Beneficiaries:** Means any person, entity or group of persons or entities who receive(s) assistance from the operations and services of the NPO.
- NPO:** Means a legal entity or organisation that primarily engages in raising or distributing funds for various purposes and/or projects and operates without pursuit of profit.
- Terrorist Organisation:** Means an organisation that is directly or indirectly engaged in preparing, planning, assisting in or fostering the doing of a terrorist act (whether or not a terrorist act occurs)
- Third Party:** Means is any individual or organisation other than a beneficiary to which the NPO provides funding or support to, or receives funding or support from to carry out its usual functions, including fund raising and delivering aid. This includes, but is not limited to: partners, intermediaries, contractors, sub-contractors and service providers.