



**MAHBOBA'S  
PROMISE**

An Australian Aid Organisation

# Sustainable Development Policy

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# COUNTER TERRORISM POLICY

Policy number	POL0038	Version	Draft Version 4
Drafted by	Alex Bellamy	Approved by	<<insert date>>
		Management committee on	
Responsible person	Operations Manager	Scheduled review date	March 2017

Mahboba's Promise recognises that non-government organisations (NGOs) which operate internationally are at risk of being manipulated by terrorist groups, particularly if they are facilitating programs with other non-government bodies within the country of operation. Organisations need a strong Counter Terrorism policy to ensure the appropriate measures are in place to combat this risk and Mahboba's Promise sincerely supports this. Mahboba's Promise wholeheartedly denounces terrorism in all its forms as well as all individuals and groups who engage in activities and actions which can be interpreted as terrorism.

## **Scope:**

This policy applies to any work conducted by Mahboba's Promise and all staff, volunteers, stakeholders, partners and contractors involved in implementing this work.

## **Policy:**

To mitigate the risk of supporting terrorist activities or groups who engage in terrorist acts, Mahboba's Promise adheres to the following strategies:

- All Australian Mahboba's Management Committee members must undergo a police check and provide evidence that they have undergone this check.
- All MPA staff must undergo a police check. If the current situation in Afghanistan makes this unachievable, staff must provide sufficient references that demonstrate their commitment to denouncing terrorism in all its forms.
- The Mahboba's Promise Management Committee will continually monitor the Consolidated List by the Australian Government. The most recent Consolidated List can be viewed here: <http://dfat.gov.au/international-relations/security/sanctions/pages/consolidated-list.aspx>
- In ensuring that any partner to whom Mahboba's Promise funding, support or resources are given to, and who are themselves further distributing assets, MPA<sup>[a1]</sup> will endeavour to ensure the partner knows of, understands and complies with all legal and contractual

requirements by:

- Providing them with a copy of this policy, the Consolidated List and any updates of these as required

-Ensuring an effective system of monitoring and communication between partners and Mahboba's Promise is in place to allow for compliance and immediate notification of concerns about terrorism if necessary.

- Prior to beginning a new partnership, service provision or funding operation, Mahboba's Promise must conduct a check of listed individuals and organisations to mitigate counterparty risk.
- Prior to transferring any material assistance, other than regular approved payments made to MPA as part of the signed International Agreement, the recipients of the transfer shall be checked for their presence on the Consolidated list.
- Mahboba's Promise must conduct regular follow-up checks to make sure that all funds, services and resources are delivered and utilised for their intended purpose through regular field reporting, monitoring and communication with beneficiaries, partners and any further partnerships they might have.
- A clause must be included in all agreements with partner organisations that, as a precondition of receiving Mahboba's Promise support and funding, partners will not support or promote terrorism or terrorist groups or engage in any actions that appear to do so.
- Partner organisations must demonstrably replicate this counter-terrorism policy and its requirements when sub-contracting any delivery partner. If they are unable to demonstrate such action, Mahboba's Promise will be forced to end the partnership.
- Mahboba's Promise Inc. and Mahboba's Promise Afghanistan must ensure that they are satisfied that any assistance provided to the beneficiaries of our projects will not be misdirected for the purpose of terrorism financing prior to project commencement.
- Thorough Risk Management plans must be undertaken when implementing a new project to ensure that this policy is firmly upheld in Mahboba's Promise activities.
- If credible information of terrorist activity is established within any funded project approved by Mahboba's Promise, funding will cease immediately and the Australian and Afghan Governments will be notified as well as the Federal Police of both countries.

### **Educating on Mahboba's Promise's Counter-terrorism Policy**

All Mahboba's Promise Management Committee members, staff, volunteers and partners will be provided with a copy of the Mahboba's Promise Counter-terrorism Policy on commencing their

association with Mahboba's Promise and on updating of this document. The policy will be read through and discussed with a Mahboba's Promise staff member to ensure clarity and understanding of its contents and the required procedures expected of those working with the organisation.

This policy will be made available on the Mahboba's Promise website to ensure transparency and acknowledgement of commitment to denouncing terrorism in all its forms.

**Reviewing this policy**

This policy will be reviewed annually by the management committee to assess its effectiveness, appropriateness and accuracy.

The policy will also be updated when DFAT makes any changes to the Consolidated List.

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