

# EXAMPLE COUNTERTERRORISM POLICY

## TOOL 7

### 1. PURPOSE AND BACKGROUND

As a non-profit non-governmental humanitarian organisation, World Response is committed to acting in a manner consistent with international humanitarian law and to undertaking its activities in accordance with the principles of impartiality, neutrality and independence. World Response is committed to ensuring that assistance and protection reach those most in need, and to preventing and mitigating the risk of aid diversion.

World Response's mandate means that the organisation sometimes operates in the same area as individuals and entities that states or intergovernmental organisations have designated as terrorist. Counterterrorism legislation in World Response's registration, operation and donor countries impose responsibilities and obligations on it and its staff. Non-compliance with these requirements may lead to disallowed costs, termination of grant agreements, legal action, fines, criminal charges and determinations of ineligibility for grants.

This policy sets out the main principles that will allow World Response to deliver assistance and protection to those most in need in accordance with humanitarian principles, while complying with relevant counterterrorism legislation and obligations.

### 2. MAIN PRINCIPLES

#### Humanitarian principles

World Response remains committed to accountability and transparency and adheres to the principles of humanitarianism and 'do no harm' set out in:

- ✓ The Code of Conduct of the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief
- ✓ The 2010 Humanitarian Accountability Partnership Standard in Accountability and Quality Management
- ✓ The SPHERE Humanitarian Charter and Minimum Standards in Humanitarian Response

## General principles

World Response is required by domestic law to ensure that none of its funds or other assets are made available to people or groups listed under UN Security Council resolution 1267. Some of World Response's donor states have also established their own counterterrorism requirements. World Response may have contractual obligations to these donors to comply with their national counterterrorism frameworks. In addition, World Response must follow local laws in the countries in which it operates, including those related to counterterrorism.

World Response has put in place appropriate controls to prevent or mitigate the risk of intentional and/or reckless diversion of aid to non-state armed groups (NSAGs) in order to ensure that assistance and protection reach the intended beneficiaries.

### These controls include:

- ✓ An ethical code of conduct, enforced by clear disciplinary procedures, which is binding on all World Response staff and consultants, and includes obligations to safeguard World Response assets and to act strictly in accordance with humanitarian principles of neutrality and impartiality.
- ✓ Programme cycle management systems that require systematic needs assessments and robust post-distribution monitoring.
- ✓ Anti-corruption procedures that focus on preventing fraud, theft and waste, including the diversion of aid and funds.
- ✓ Internal vetting of staff, contractors and implementing partner organisations with World Response contracts of more than \$X against applicable terrorism lists.
- ✓ Mandatory internal requirements to report suspicious transactions involving criminal groups, which would include individuals and groups engaged in acts of terrorism.

## Duty of care

World Response is committed to providing clear, relevant guidance and support to staff and partners at all levels on how to best manage and implement programmes and operations in relation to counterterrorism measures.

## Vetting

World Response will vet potential partners, contractors, and vendors above a certain threshold, and candidates for employment and employed staff above a specific grade.

In accordance with the humanitarian principles of impartiality and independence, World Response will not vet beneficiaries, nor will it require partners to do so.

## Allegations of misconduct

World Response staff who become aware of information suggests that World Response assets might have been used to promote or facilitate terrorism must immediately report such information to XXX in accordance with the relevant policy.

### **3. IMPLEMENTATION AND COMPLIANCE**

World Response's director and board have overall responsibility for ensuring the organisation manages risk appropriately and activities are undertaken in accordance with World Response's policies and procedures.

### **4. RELATED DOCUMENTS**

- ✓ Standard operating procedure: vetting
- ✓ Data protection policy
- ✓ Logistics handbook
- ✓ Financial handbook
- ✓ Policy on engagement with NSAGs