



Counter Terrorism and Anti-Money Laundering

Purpose

Live & Learn Environmental Education (LLEE) will take all reasonable steps to ensure that its activities do not contribute towards or support terrorism. LLEE will comply with all relevant legislation in Australia and relevant partner countries.

The purposes of the policy are to:

1. Outline LLEE's position on protecting against terrorism and money laundering, and
2. Set out high-level processes and responsibilities for ensuring this policy is implemented.

Policy

LLEE recognises the risk that non-government organisations (NGO) can be misused by individuals and/or other organisations to support terrorist activities through money laundering. International NGO's are particularly vulnerable due to their high level of public trust and close proximity to terrorist activities.

LLEE is committed to ensuring that it complies with all relevant Australian legislation, as well as the laws of the countries where it operates. In addition, LLEE will use the Australian Government's Guidance for Non-Profit Organisations 'Safeguarding Your Organisation against Terrorism Financing' ('the Guidelines').

LLEE recognises that according to the Guidelines its operations may be viewed as possessing a high level of potential risk. This is because LLEE conducts activities overseas, and works with, and provides funding, to other overseas organisations. In addition, some of the countries where LLEE operates have an identified level of terrorism activity. As such, LLEE is committed to adopting a risk-based approach when undertaking new projects and partnerships and will take necessary precautions to ensure it does not support terrorist activities.

To this end, LLEE adopts the best practice principles outlined in the Guidelines and will:

- Make all reasonable efforts to ensure that funds are not being directed to terrorist activities, and will comply with the laws of all countries it operates in.
- Seek to understand the underlying level of risk in relation to terrorism financing, and take necessary precautions where risk is evident.
- Ensure that management, staff and volunteers are aware of the level of risk and ensure that appropriate precautions are in place if necessary.
- Ensure that staff, beneficiaries and third parties are known, and where possible: conduct background checks on management, staff and volunteers.
- Annually check that beneficiaries and third parties are not listed individuals or organisations in the Australian Department of Foreign Affairs and Trade website.

- Conduct financial transactions, where possible, through regulated financial institutions, such as banks or building societies.
- Report any suspicious activity to the Australian Federal Police.
- Make all reasonable efforts to ensure that third parties receiving funds are aware of, and seek assurance that the third party will comply with, all applicable laws.
- Make all reasonable efforts to ensure the third party is aware of, and seek assurance that the third party will comply with this Policy.
- Maintain records of what assistance has been provided, who has received it, and the details of any third parties involved.
- Conduct follow-up checks to make sure that assistance was delivered as intended.

LLEE will also ensure that it undertakes the necessary due diligence when accepting substantial donations from, or partnering with, new third parties.

Procedures - Receiving a complaint

As per the Guidelines, if the third party is an individual, LLEE will seek the following information (directly or indirectly):

- name (including any aliases used), date of birth and contact details (e.g. Phone numbers, postal address, email and URL addresses)
- nationality and country of residence
- the name and contact details of organisations which they operate
- a statement of the principal purpose of engagement
- Details of other projects/operations/initiatives/commitments, either being undertaken or already conducted by the third party – including information on the beneficiaries of these actions, and
- any other reasonably available information that assures LLEE of the third party's identity and integrity.

If the third party is an organisation, LLEE will seek the following information:

- the name and available contact details (e.g. phone numbers, postal address, email and URL addresses)
- the jurisdiction in which the organisation is incorporated or formed
- any other names that the organisation operates under
- a statement of its principal purpose
- corporate documents, such as copies of incorporating or other governing instruments, information on the individuals who formed and operate the organisation, and information relating to the beneficiary's operating history
- details of other projects/operations/initiatives/commitments, either being undertaken or already conducted by the third party – including information on the beneficiaries of these actions, and
- any reasonably available information that assures LLEE of the third party's identity and integrity.

LLEE will also provide this information to other potential partnership organisations to uphold the spirit of the Policy.

LLEE will ensure that it understands the particular groups it is assisting and is satisfied that any assistance provided to its beneficiaries will not be misdirected for the purpose of supporting terrorism. This may include finding out whether terrorist organisations operate in the area in which beneficiaries are located.

Roles and Responsibilities

Executive Director, Regional Director, Country Manager:

- Monitors the implementation of the Counter Terrorism and Anti-money Laundering Policy and Procedures, and
- Delegates responsibility for its implementation.

Finance Manager, Finance Officer:

- Implement the policy and procedures ensuring that all staff are aware of the policy abide by it, and
- Identify opportunities for improvements.

Staff at all levels

- Ensure they are aware and understand the requirements of this policy and comply with it.

Related Documents

- Recruitment Policy
- Criteria for Partner Selection
- ACFID Code of Conduct <https://acfid.asn.au/code-of-conduct>
- ANCP Manual <http://dfat.gov.au/about-us/publications/Documents/ancp-manual.pdf>.