



Partner Housing Australasia (Building) Incorporated
 ABN 88 722 057 429 CFN: 15429
 Web: www.partnerhousing.org
 Pro-bono professional services and funding for South Pacific
 village infrastructure, housing, water, sanitation and training.



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Partner Housing is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability and integrity.

Prevention of Terrorism Financing Policies and Procedures



Declaration – These policies and procedures have been approved by the Partner Housing Australasia (Building) Incorporated General Meeting of 3 April 2023. They set out the means of complying with the “Constitution & Code of Conduct”, and the requirements of the Australian Department of Foreign Affairs and Trade (DFAT) and the Australian Council for International Development (ACFID).

Signed

Rod Johnston, President, Partner Housing Australasia (Building) Incorporated

Adoption of Document Revisions

Reference	Revision	Date of Adoption	Principal Amendments
P23040358	1	3 April 2023	Revision to align with Vision, Mission, Values & DFAT requirements

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Vision

Partner Housing Australasia is an entirely voluntary organisation, which aims to transform the lives of people living in Asia-Pacific villages by improving the cyclone, earthquake, and tsunami resistance of their houses, clinics, schools and community buildings; and by providing clean water supplies and hygienic sanitation.

Commitment

Consistent with the vision, Partner Housing Australasia and its Partner Organisations are committed to designing policies, procedures, and programs that enhance the safety of beneficiaries and do not contribute in any way, either directly or indirectly, to the spread of terrorism or civil unrest.

Code of Conduct

Partner Housing Australasia is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory, we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability, and integrity. The following policies and procedures have been developed to reflect the vision statement, and to simultaneously ensure consistency with the ACFID Code of Conduct.

Scope

These Policies and Procedures apply to Partner Housing Australasia, its Partner Organisations, Representatives, and any guests who might accompany these people to the locations where the programs are implemented. The “Policy” expands the organisation’s vision, mission, and values; together with satisfying the DFAT and ACFID requirements, and the “Procedures” set out the means of implementing policy. An associated “Training” document provides additional material and background, and “Compliance and Audit Record” documents provide the relevant records of compliance and verification.

Definitions

A comprehensive set of definitions is set out in “Constitution & Code of Conduct”. Definitions specific to this policy are set out below.

Partner Organisations are those bodies working with Partner Housing Australasia to implement the programs. For purposes of this document, they include (but are not limited to) Vision for Homes [PNG] and South Ranongga Community Association [SRCA].

Representatives is the term used to describe collectively the Board Directors, Managers, Volunteers, Staff (if so engaged), Contractors and Consultants who administer the programs and projects.

Volunteer means a person who carries out executive, management, administrative, operations, design, project management and/or similar functions (whether executed in Australia or overseas) on a probono basis, under the direction of the Chief Executive Officer (on behalf of the Board). A Volunteer may also be a Member or a Director. Partner Housing Australasia is an entirely voluntary organisation. Volunteer does not include “Contractors” or “Consultants”, who provide goods or services on a probono or commercial basis, or people who provide minor assistance on a casual and infrequent basis.

Risk Analysis is a systematic use of available information to determine how often specified events may occur and the magnitude of their likely consequence. For purposes of this policy, Risk Analysis, and associated terms (including those listed herein) are as defined in ISO 31000 and AS/NZS 4360.

Civil Unrest means organized acts of violence at different locations within a state. For purposes of this policy, violent civil unrest, including tribal violence, will be considered under the terrorism policy.

Terrorism is the unlawful use of violence and intimidation, especially against civilians, in the pursuit of political aims.

Screening is the systematic determination of the characteristics of associated organisations and people. In the context of this document, screening includes the use of the DFAT “Consolidated List of Australian-sanctioned individuals and entities” and other investigations, to determine whether certain individuals and entities are sanctioned under Australian law, and thus cannot be engaged as partners or contractors.

Policy

Partner Housing Australasia and its Partner Organisations shall ensure that their activities do not contribute in any way to, either directly or indirectly, to the spread of terrorism or civil unrest.

E3.8 Prevention of Terrorism Financing

- Partner Housing Australasia and its Partner Organisations shall not participate in political activism, terrorism or civil unrest.
- Partner Housing Australasia shall not partner with organisations involved in political activities or the like, or any organisation that could be that could be associated directly or indirectly with terrorism or civil unrest.

E3.9 Terrorism Screening

- Partner Housing Australasia shall systematically annually screen partners and their personnel for terrorism associations.
- Given that the current assessment of Partner Housing Australasia for the risk of diversion of funds to terrorist organisations ranges from “negligible” to “low”, the screening process shall be to check partners and their personnel against lists of prohibited terrorist organisations and individuals using the “Consolidated List of Australian-sanctioned individuals and entities” under Australian law.
- Partner Housing Australasia shall obtain the relevant entity details from partners, to enable the required vetting and screening processes to be undertaken.

E3.10 Support for Partner Organisations to prevent terrorism financing

- Partner Housing Australasia shall ensure that it has appropriate risk management systems in place to prevent funds going directly or indirectly to individuals or organisations associated with terrorism. The following policies shall apply.
- Partner Housing Australasia shall monitor the accounts of its partners to ensure that they do not participate in, or provide finance for, political activity, terrorism or civil unrest.
- Memoranda of Understanding with Partners Organisations shall include specific clauses ensuring that they do not participate in, or provide finance for, political activity, terrorism or civil unrest.
- Partner Housing Australasia shall provide anti-terrorism training for Partner Organisations.

E3.11 Risk management for prevention of terrorism financing

- Partner Housing Australasia shall ensure that it has appropriate risk management systems in place to prevent funds going directly or indirectly to individuals or organisations associated with terrorism. The following policies shall apply.
- A formal Risk Analysis and due diligence shall be carried out for each Partner Organisation (or as soon as practical in the case of existing Partner Organisations), including a formal quantification of relative risk and the appropriate mitigation.
- Partner Housing Australasia shall only operate in regions where the risk of financing terrorism is judged to be negligible or low.
- Each program shall incorporate a risk management framework, financial controls and monitoring that effectively prevent fraud, corruption, money laundering and financing of terrorism.
- Partner Housing Australasia Regional Managers shall provide direct oversight to funded programs.
- Partner Housing Australasia shall not remit cash to individuals or organisations.
- Partner Housing Australasia shall ensure that personnel who have responsibility for disbursing funds have training in the mechanisms of fraud, corruption, money laundering and financing of terrorism and the risk in project design, monitoring and reporting.

Responsible Personnel

The person with overall responsibility for implementing this policy is the Chief Executive Officer (CEO), with delegated responsibility to the Regional Managers in respect of site visits and the HR Manager in respect of Police Checks.

Procedures

Review of these Policies and Procedures

The policies and procedures set out in this “Policies and Procedures” document shall be reviewed at each Annual General Meeting, as part of the scheduled general policy review.

Risk Analysis

The CEO shall implement the following:

- Ensure that the Partner Organisation Manager visits each current and proposed work site, conducts discussions with the village residents, and determines the factors that are likely to affect the risk of inadvertently financing terrorism resulting from the proposed project. This determination shall be emailed to the Partner Housing Australasia CEO and to the Regional Manager.
- Carry out thorough desk research into the potential risk of inadvertently financing terrorism resulting from the proposed and current projects.
- Based on the determination and desk research and the input from the Partner Organisations, prepare a Risk Analysis for inadvertently financing terrorism, considering both the direct and indirect actions of Partner Housing Australasia and the implementing Partner Organisation.
- Assess and prioritize the risk of inadvertently financing terrorism associated with each program and its component projects, and determine the appropriate mitigation actions (risk treatment).
- Record the Risk Analyses and the mitigation actions in the Strategic Plans appropriate to each program.
- Summarize the Risk Analyses and the mitigation actions in a Risk Register.
- Implement the proposed mitigation actions (risk treatment).
- During regular reviews, consider the effectiveness of the mitigation actions (risk treatment) and report to the Board.

Identifying Terrorists and Terrorist Organisations

The Responsible Personnel shall implement the following:

- Receive and monitor the regular advice provided by DFAT regarding asset freezing and sanctions against particular organisations and individuals.
- Receive the regular updates of the DFAT Consolidated List of proscribed persons spreadsheet, and copy them into the Program Control workbook. [DFAT Consolidated List \(DCL\)](#)
- When Partner Housing Australasia first deals with organisations or individuals, check the DFAT Consolidated List of proscribed persons spreadsheet to ensure that they are not listed. Repeat the checking annually, and report to the February Board Meeting.
- If there is increased risk of terrorism in a particular region, additional lists such as the ADB Sanctions List may also be consulted. [Asian Development Bank Sanctions List \(ADB\)](#)
- Review the current list of Partner Organisations and potential partner organisations, and ensure the removal of any that cannot be demonstrated to meet the requirements of this policy.

Example of Record of Screening

Partner Housing Australasia (Building) Incorporated							
The Sanctions Snapshot (190905 Snapshots - Sanctions) has no relevant listing in the countries where PHA operates.							
The United Nations advice documents are scrutinised on receipt, and no matches to the above names were detected during the period.							
Name of Individual	Position & Name of Organisation	Lists Checked		Lists Checked		Lists Checked	
		DFAT DCL	DFAT DCL	ADB	DFAT DCL, MatchLite	LTO	ADB
John's Black Pigeon	Partner Housing Australasia South Ranongga Community Association	No match 12/12/2022 Rod Johnston	No match 15/1/2022 Rod Johnston	No match 15/1/2022 Rod Johnston	No match 24/1/2021 Rod Johnston	No match 24/1/2021 Rod Johnston	No match 24/1/2021 Rod Johnston
John's Black Pigeon	Partner Housing Australasia South Ranongga Community Association	No match 12/12/2022 Rod Johnston	No match 15/1/2022 Rod Johnston	No match 15/1/2022 Rod Johnston	No match 24/1/2021 Rod Johnston	No match 24/1/2021 Rod Johnston	No match 24/1/2021 Rod Johnston
John's Black Pigeon	Partner Housing Australasia South Ranongga Community Association	No match 12/12/2022 Rod Johnston	No match 15/1/2022 Rod Johnston	No match 15/1/2022 Rod Johnston	No match 24/1/2021 Rod Johnston	No match 24/1/2021 Rod Johnston	No match 24/1/2021 Rod Johnston
		No match	No match	No match	No match	No match	No match

Ensuring Partner Organisations are not funding terrorism

The Responsible Personnel shall implement the following:

- In particular, Partner Housing Australasia shall monitor the accounts of its partners (including Vision for Homes [PNG] and South Ranongga Community Association [SRCA]) to ensure that they do not participate in, or provide finance for, political activity, terrorism or civil unrest.
- Memoranda of Understanding with partners (including Vision for Homes [PNG] and South Ranongga Community Association [SRCA]) shall include specific clauses ensuring that they do not participate in, or provide finance for, political activity, terrorism or civil unrest.
- Partner Housing Australasia shall provide anti-terrorism training for partners (including Vision for Homes [PNG] and South Ranongga Community Association [SRCA]).
- Partner Housing Australasia shall only contract with, or provide funds to, organisations; and not to individuals.
- Ensure Partner Organisations are well-known and are reputable, and have key development goals and terrorism policies in alignment with Partner Housing Australasia and its policies.
- When establishing working arrangements, Contracts and/or Memoranda of Understanding with client NGOs, obtain an assurance and a copy of their Terrorism Policy.
- Accounts shall be audited by Australian Auditors and records shall be available for review. All donations shall be listed in financial statements provided at Annual General Meetings, including bank account name. Ensure that finances are not being directed towards individuals or organisations known to be involved in terrorism.
- Observe and review any on-site evidence (whether in person or through emails, photographs etc) of the existence of terrorism. Report any suspicious behaviour as appropriate. The means of reporting shall be in the format set out in Project File. If an instance of terrorism is detected, the Regional Manager shall raise it with the Chief Executive Officer, who shall notify the local police and/or the Australian Federal Police (depending on the jurisdiction) and DFAT, and implement procedures to terminate the MOU.
- Review the Anti-terrorism Policies in the context of this and other projects at each February Board Meeting. A report on DFAT searches of terrorism in the context of the Partner Organisation and any known noncompliance shall be presented to the February Board Meeting.
- Ensure a Memorandum of Understanding, including the relevant policy, is signed by the Manager of each Partner Organisation.
- Obtain an Australian Federal Police check of each Volunteer serving overseas.

Compliance and Auditing

The Responsible Personnel shall implement the following:

- Initiate the required monitoring, evaluation and learning functions associated with this “Policies and Procedures” document.
- Initiate both internal and external auditing, consistent with ISO 9001 principles of the policies and procedures herein.
- Ensure that the compliance with the policies and procedures herein, and the associated internal and external audits, are recorded in the associated “Compliance and Audit Records” documents.

Training

The Responsible Personnel shall implement the following:

- Distribute a reference and link to this “Policies and Procedures” document to all Directors, Regional Managers and Partner Organisation Managers, and other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff).
- Distribute a reference and link to the associated “Training” package. Request that all Directors, Regional Managers and Partner Organisation Managers use this to increase their awareness and understanding of these policies and procedures.
- Include a reference and link to this “Policies and Procedures” document in all Memoranda of Understanding with Partner Organisations.
- Table this “Policies and Procedures” document at the Annual General Meeting, for discussion and adoption.
- Review the training effectiveness at the February Board Meeting.