WVA COUNTER-TERRORISM FINANCING POLICY			
APPROVED BY:	Management – Executive Leadership Team		
POLICY OWNER:	Chief of Programs, John Patterson	POLICY DELEGATE:	Head of Humanitarian Emergency Affairs, Patrick Thomas
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ASSOCIATED WVI POLICY:	Partnership Management Policy – Blocked Party Screening		

PURPOSE

To ensure WVA funds are not used for Terrorism Financing. This protects WVA's reputation and ensures compliance with legal obligations.

WHO?

This Policy applies to all WVA employees and is primarily applicable to the IAPG and Corporate Services teams. In particular, members of those teams who deal with engagement of suppliers and partners, transfer of WVA funds to the field and monitoring and reporting in relation to those funds.

WHAT YOU NEED TO KNOW

1. It is against the law to provide funds to a Blocked Party or to various sanctioned activities.
2. WVA has a zero-tolerance risk appetite on CTF.
3. WVA takes a risk-based approach to manage CTF risk by taking additional steps in Sanctioned Contexts.
4. This Policy sets out the actions that WVA employees must take to ensure that WVA funds are not used for Terrorism Financing.

WHAT YOU NEED TO DO

1. Read and understand this Policy and its requirements.
2. Make sure you are familiar with any specific requirements that relate to your role or day-to-day business activities.
3. Ensure you read and understand the WVA CTF Guidelines which set out in more detail the roles and responsibilities of stakeholders and any actions you may need to perform.
4. Ensure you get appropriate approvals and sign-offs for any activities that could pose a CTF risk to WVA.
5. Ensure you undertake required training specific to your role.
6. Ensure you escalate any breaches of this Policy in line with the Breach Reporting section of this document.

POLICY STATEMENTS

1. **Zero Tolerance:** WVA has a zero-tolerance risk appetite for the diversion of resources to Terrorism Financing. This means the provision of any benefit to a Blocked Party or to a sanctioned activity is prohibited. All WVA employees are responsible for ensuring that appropriate steps are taken to prevent Terrorism Financing.

2. **Risk-Based Approach:** WVA takes a risk-based approach to the identification and management of Terrorism Financing risk. This means that WVA's resources are committed to the prevention of Terrorism Financing commensurate with the level of risk. Where WVA undertakes programming in Sanctioned Contexts (Australian Autonomous Sanctions, UNSC Sanctions or Criminal Code Act implications), it will undertake additional due diligence and monitoring & assurance activities as detailed in the CTF Guidelines. There may be Sanctioned Contexts to which WVA cannot commit funds due to the level of CTF risk.

3. **Due Diligence** on Partners and Suppliers must be completed prior to contractual engagement or any disbursement of funds. In Sanctioned Contexts, a CTF risk assessment and enhanced due diligence will be completed in accordance with the CTF Guidelines and will form part of the decision on whether a Partner or Supplier is engaged. WVA will also undertake ongoing due diligence activities to ensure that any changes in status of entities that we have already contracted with are identified and managed appropriately. Copies of completed due diligence records must be kept as detailed in the CTF Guidelines.

4. **Screening** activities are performed as part of WVA's due diligence activities.

   4.1 WVA requires that screening in relation to CTF must be performed on:
   - a. WVA Board Members, Employees, contractors and volunteers prior to appointment;
   - b. Partners and Suppliers in receipt of WVA funds (including WV Field Offices and their Implementing Partners and Suppliers on WVA funded programming);
   - c. donors contributing AUD $10,000 or more in a financial quarter; and
   - d. any other party where required by a government or multilateral donor.

   4.2 Where WV Field Offices receive WVA funds for programming, the FO will typically undertake the required screening (including rescreening) in accordance with WVI's Blocked Party Screening Policy. Where the program is taking place in a Sanctioned Context, WVA will ensure that Beneficial Ownership screening is conducted as detailed in the CTF Guidelines. WVA will undertake monitoring and spot checking to ensure that screening has occurred in accordance with WVI's Blocked Party Screening Policy.

   4.3 WVA will perform all other Screening required under Section 4.1, and where the FO is unable to conduct the Screening required under Section 4.2.

   4.4 Where there is a Hit Match as part of the screening process which cannot be cleared following the process set out in the CTF Guidelines, it will be escalated to WVA Legal. If it is a Confirmed Hit, WVA will not engage with the potential Partner or Supplier. Should the Confirmed Hit arise after onboarding, any disbursements to the Blocked Party will cease immediately and necessary notification/termination steps will be undertaken in line with the CTF Guidelines.

   4.5 Copies of completed screening records must be kept for screening performed by WVA as detailed in the CTF Guidelines.

   4.6 WVA will undertake ongoing rescreening according to the time frames in the CTF Guidelines.

5. **Contracting:** WVA must ensure that third parties it engages are made aware of and understand their obligations under this Policy.

   5.1 Where a contractual relationship is entered into, agreements must include a clause requiring Partners and Suppliers to comply with this Policy and report and act against any Terrorism Financing activities which occur in their organisation. The WVA Suppliers Code of Conduct will also be provided to Suppliers to ensure they understand these requirements.

   5.2 Where WVA enters into contracts with Partners for implementation of programming using Donor Funds, the contract must include clauses which 'pass on' the specific requirements of the donor, and which require the same of any subcontractor.

6. **Monitoring and Assurance** activities will be undertaken to ensure that the requirements outlined in this Policy are adhered to. In relation to Field Offices in receipt of WVA funding, these activities will supplement the monitoring and assurance activities undertaken by WVI to assess compliance with their Blocked Party Screening Policy and other WVI requirements. Further details on specific monitoring and assurance activities are outlined in the CTF Guidelines.

7. **Training:** WVA will ensure that all Employees are educated in the management of Terrorism Financing risk as part of the employee onboarding process and through refresher training provided on a regular basis. Board Members, volunteers and third parties that engage with WVA are to be made aware of this Policy. Where WVA funds are allocated to a Field Office, WVA must ensure that FO employees undergo training on CTF and any specific requirements this Policy requires them to follow. WVA will supplement Field Office training where required and maintain relevant records of such supplemental training.

POLICY BREACHES

Reporting a Policy Breach: Breaches must be reported internally. Failing to do so can have serious implications for WVA in relation to our ability to operate as a business and as a charity. To comply with this, any person who identifies a breach of this Policy must report it using one of the following processes:

- by raising with your immediate or any other Manager/Chief within WVA;
- by raising with the Head of Risk; or
- via WVA's Protected Disclosure (Whistleblower) procedures including via the nominated independent, confidential external service (refer to WVA Hub detail on reporting via this mechanism).

Any verified diversion of funds to a Blocked Party with WVA representatives and/or third parties are reported to the WVA Audit & Risk Committee by the WVA Risk team. Any Confirmed Hits are recorded on the Confirmed Hits Register maintained by WVA Legal.

External Reporting: WVA may also have external reporting obligations depending on the nature and circumstances of the breach. Where required, the impacted donor will be notified in writing of the suspicion or actual diversion of funds within their stipulated timeframe. Any other third parties where relevant (e.g. DFAT, ACNC, insurers) will be notified as applicable, including where a diversion of funds has been identified. Details of the procedures for this reporting are outlined in the CTF Guidelines.

POLICY DEFINITIONS

ITEM	DEFINITION
Beneficial Ownership	A natural person(s) who ultimately owns or controls an entity, whether directly or indirectly. This includes individuals who own 25% or more of the entity, or who otherwise exercise effective control over the entity's management or operations, including through decision making authority, trust arrangements, or other means.
Blocked Party	An individual or entity that is listed on a Prescribed List.
Confirmed Hit	Where a Hit Match per Watchdog Elite has been reviewed and has been confirmed as an actual hit. That is, the entity screened is confirmed as being on a Prescribed List.
Counter Terrorism Financing (CTF)	Prevention of Terrorism Financing.
DFAT	The Department of Foreign Affairs and Trade of the Australian Government.
Donor Funds	Funding from government or multilateral donors such as DFAT, World Bank, and the European Union.
Employee	Any person that is employed by WVA on a temporary, or permanent, casual, part-time or full-time basis.
Field Office (FO)	A World Vision office that is part of the Partnership, in a country other than Australia that undertakes the day-to-day operations and transactions to deliver the programming/activities funded by WVA.
Global Centre (GC)	WVI function that provides overall guidance and support to Support and Field offices in the partnership.
Hit Match	Watchdog Elite Screening report indicates a potential match to the search name entered against a Prescribed List.
Partner	An individual or entity that receives funds originating from WVA and is engaged to assist in delivering the programming and desired outcomes specified as desirable by the specific donor.
Prescribed Lists	Each of the following lists: **a. the Sanctions List:** the list of individuals, entities or organisations designated or listed by the United Nations Security Council, its committees or the Australian Government for targeted financial sanctions or similar measures **b. the Criminal Code Act List:** the list of organisations that are specified as a "terrorist organisation" by regulations made under the Criminal Code Act 1995 **c. the World Bank List:** the list of organisations maintained by the World Bank in its "Listing of Ineligible Firms and Individuals" of firms and individuals who are ineligible to be awarded a World Bank- financed contract because they have been sanctioned under the Bank's Fraud and Corruption Policy.
Sanctioned Context	A context will be considered a Sanctioned Context where: - Australian Autonomous Sanctions or UNSC Sanctions are in place; or - there is presence of a terrorist organisation on the Criminal Code Act List.
Screening	Process of collating relevant documents for the name/s of individuals, organisations and entities that will be processed through Watchdog Elite to see if they appear on a Prescribed List.
Supplier	An individual or entity which provides goods or services and is paid via funds that originate from WVA. As such the supplier can be located in Australia or overseas.
Terrorism Financing	The financial support, in any form, of terrorism or of those who encourage, plan or engage in terrorism. It generally falls into two broad categories: - funding the direct costs associated with undertaking terrorist acts - for example, expenses for travel, explosive materials, weapons and vehicles - funding required to maintain a terrorist network, organisation or cell.
WatchDog Elite	Web based screening tool utilised across the Partnership for sanctioned or screening Blocked Parties on various lists including DFAT, World Bank and the EU.

POLICY REVISION HISTORY

REVISION DATE	SUMMARY DESCRIPTION OF REVISION	SECTION(S) CHANGED
October 2022	New Policy	ALL
July 2026	Updates to Policy to reflect recommendations from CTF Internal Audit and to better align policy requirements with current process activities.	ALL

SUPPORTING INFORMATION TO THIS POLICY

In addition to the information contained in this policy, several external references and resources that can be used or referenced in conjunction with this policy. These documents include (but are not limited to):

STANDARD/ INDUSTRY REFERENCE	SUMMARY OF WHAT THESE COVER
Charter of the United Nations Act 1945	The *Charter of the United Nations Act 1945* gives effect in Australia to United Nations Security Council sanctions, including counter-terrorism financing measures, by prohibiting dealings with designated persons, entities and assets. It creates offences for making funds or other assets available to Blocked Parties.
Autonomous Sanctions Act 2011	The *Autonomous Sanctions Act 2011* establishes Australia's autonomous sanctions regime, enabling the Australian Government to impose targeted financial and trade restrictions for foreign policy and national security purposes. It prohibits specified dealings with designated countries, entities and individuals, with criminal penalties for breaches.
Criminal Code Act 1995	The *Criminal Code Act 1995* criminalises terrorism-related conduct, including providing, collecting, or making funds or resources available where there is knowledge or recklessness that they may be used for a terrorist act or organisation, making the prevention of terrorism financing a strict legal obligation.
DFAT Sanctions Frameworks and Resources	The DFAT website contains several resources to assist with sanctions compliance https://www.dfat.gov.au/international-relations/security/sanctions
DFAT Accreditation Criteria	Requires Australian NGOs to demonstrate robust governance, financial management, risk management, and due diligence frameworks to ensure Australian Government funds are managed transparently, accountably, and in a manner that prevents fraud, corruption, and misuse, including diversion to unlawful or terrorist activities.
ACNC Obligations & External Conduct Standards	Require charities operating overseas to apply reasonable governance, oversight, and risk controls to ensure funds and resources are used for legitimate charitable purposes, including preventing fraud, corruption, and diversion to unlawful activities such as terrorism financing.

OTHER SUPPORTING DOCUMENT	SUMMARY OF WHAT THESE COVER
WVI Blocked Party Screening Policy	Sets out WVI's risk-based framework for screening individuals and entities against applicable sanctions and blocked party lists. It aims to prevent the World Vision Partnership from directly or indirectly engaging in transactions with sanctioned or prohibited parties.
WVA CTF Guidelines	Provides practical guidance on identifying, assessing and managing counter-terrorism financing risk across WVA operations. They support the implementation of this Policy by outlining due diligence, screening, record-keeping and escalation requirements.
WVA Contract and Procurement Policy	Sets out the principles and mandatory requirements governing WVA's contracting and procurement activities. It ensures that contracts are appropriately approved, documented and managed, and supports compliance with legal, sanctions and counter-terrorism financing obligations.