



**WOMEN INFORMATION NETWORK (WINET)
POLICY
ON
ANTI-TERRORISM**

Commencement

The implementation of this policy shall commence on the 1st day of March 2020.

Definition

According to Wikipedia, Anti-Terrorism or Counter Terrorism incorporates the practice, military tactics, techniques and strategy that government, military, law enforcement, business, intelligence agencies and non-governmental organizations use to combat or prevent terrorism.

1. Background

Women Information Network (WINET) is a non-governmental organization which recognizes that there may be a risk of its donor funds being diverted by staff, contractors, financial service providers and partners to finance or support terrorist activities.

WINET realizes that, as other sectors (e.g. financial sector) are tightening their safeguards against terrorist abuse, there is a risk that terrorist organizations may focus more attention on the NGO sector.

WINET is aware that countries have different approaches and levels of regulation and safeguards and has therefore developed this policy to ensure that we are consistent in our approach.

WINET believes that strong effective governance, financial and partner management are key to preventing abuse. This policy highlights the mechanisms in place to check such abuse. The issue of diversion of aid and contravention of counter-terrorism legislation is viewed as an internal control and risk management issue alongside fraud, bribery and corruption.

WINET has developed this policy to ensure that her resources and donor funds are not being used directly or indirectly to support terrorist activities and to provide a clear guide on what to do if

terrorist activity is suspected. More broadly, this policy will support WINET to implement its activities in line with its mission statement and core values.

Our donors have extensive legislation around anti-terrorism and national security. International and national bodies impose strict obligations on funding recipients to ensure that funds do not support terrorist activities. WINET will use its best practices and principles to ensure that her programmes are conducted in the context of these laws and obligations.

Failure to comply with donor requirements could significantly dent the reputation of WINET as well as expose the organization to potential penalties. This policy therefore articulates WINET's commitment to avoid involvement in terrorist activities and terrorist financing and outlines processes and procedures aimed at preventing, stopping, and punishing terrorism financing that has the capacity to result in the diversion of humanitarian aid or assistance.

2. Policy statement

WINET renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace and or finance terrorism. WINET is firmly committed to the international fight against terrorism, and in particular, against the financing of terrorism. It is the policy of WINET to seek to ensure that none of its and its donor funds are used, directly or indirectly, to provide support to individuals or entities associated with terrorism. In accordance with this policy, WINET undertakes to use reasonable efforts to ensure that none of its or its donor funds are used to provide support to individuals or entities associated with terrorism.

International and national regulations: WINET recognizes the regulations by which donor countries abide and relevant legislations related to counter terrorism.

3. Scope

This policy applies to all WINET Board members, staff, interns and volunteers, financial service providers and contractors (suppliers, service providers and consultants).

This policy also applies to all partner organizations, their board members, staff, volunteers & interns, financial service providers, contractors and sub-grantees implementing projects with WINET funding.

4. Mechanisms to fight terrorism

4.1 Approach

WINET's procedures have a strong emphasis on "deter, detect, prevent, and respond". To minimize the risk of aid diversion, and in particular terrorism financing, WINET employs the following approaches:

1. Conducts regular risk analysis concerning anti-terrorism activities. The risk analysis typically includes a review of the relevant legal requirements of donor governments, transit governments (e.g., territories through which goods or services are transferred), and host state governments, as well as donor policies and industry standards (if any) from other sectors. It also includes security analyses, including stakeholder analyses (armed groups, state and non-state actors), to determine the risk of terrorism targeting or undermining our operations.
2. Enforces a strict code of conduct among its staff and staff of partner organizations with a strong reference point to anti-diversion and a statement on financial transactions with armed groups.
3. Maintains comprehensive financial records which account for all expenditure and publishes annual financial statements with detailed breakdown of incomes and expenditures.
4. Conducts annual external audit of all expenses as well as external audits of specific projects.
5. Reserves the right to carry out Third Party reference checks on individuals with whom WINET has or plans to have a contractual link to ensure these individuals are not associated with terrorism and do not appear on counter-terrorism lists through the use of an industry-standard auto-screening software.
6. Ensure training of its staff and partners on anti-diversion policies, procedures and practices.
7. Conducts an in-depth due diligence of partners and sub-grantees, including Third Party Reference Check to ensure the partner/sub-grantee does not appear on counter-terrorism lists through the use of an industry-standard auto-screening software.
8. Applies a “know your supplier” principle for procurements for all national, international and restricted tenders.

4.2 Enforcement

1. **Executive Director and Program Managers are responsible for:**
 - i. Ensuring that WINET and all staff members, volunteers & interns and contractors comply with all relevant legislations, WINET Code of Conduct and WINET policies;

- ii. Ensuring that all partner organizations and their board members, staff members, volunteers and contractors implementing aid and development projects funded by or through WINET comply with all relevant legislation and policies.
- iii. Reporting to the Executive Director any information which could relate to breaches of this policy.

2. All employees, volunteers & interns are responsible for:

- i. Complying with this policy and other relevant legislation.

3. WINET Human Resources Department is responsible for:

- i. Recruitment of employees, volunteers & interns, and any additional Third party reference checks
- ii. Ensuring that each member of staff abides by WINET Code of Conduct;
- iii. Ensuring adherence to relevant data protection legislation;
- iv. Providing support to managers and other staff during any complaint or dismissal process.

4. WINET Security & Safety Focal Point is responsible for:

- i. Ensuring that up to date risk assessments and contextual analysis are provided for each area of intervention to determine risks (of aid diversion).

5. WINET Finance Department is responsible for:

- i. Maintaining financial records and tracking all expenses and incomes: WINET maintains an accounting system that allows tracking any expenses or incomes with a unique reference (voucher number) in the system. Each direct cost is linked to a specific project, contract and donor;
- ii. Controlling the use of WINET funds: through internal control mechanism as outlined in WINET's Finance manual and procedures;
- iii. Selection of banks/financial institutions: following a due diligence check, include third party reference check;
- iv. Bank management: authorized levels to carry out financial operations, segregation of duties, signatures, monthly bank reconciliations contribute to having a clear picture on the use of funds and avoid misuse of funds;
- v. Cash management: cash keeping processes, segregation of duties, monthly cash checking, contribute to having a clear picture on the use of funds and avoid misuse of funds;

Money transactions:

-Control done before payment: as defined in WINET’s finance manual and procedures, no commitment of expense can be done without authorization, must be documented with both internal (validation of the expense beforehand, including purpose of the transaction and link to the budget line of the donor’s contract) and external documentation (bill, receipt, proof that the service or good has been provided). Then only the expense can be done and booked in the system.

Bank transfers are preferred. In case of payment to be done in cash, a specific procedure has to be followed with identity check of the person coming to collect the payment at the office. Following any payment by WINET, a confirmation of the receipt of funds is systematically requested.

Donations can only be accepted - as any other source of funding going through WINET - upon the Executive Director’s review and validation.

No donation can be done by WINET to an external entity without Executive Director’s review and validation, due diligence of the entity and signature of a contract.

6. WINET’s Procurement Committee is responsible for:

- i. Procurement and contractor/supplier management based on the “know your supplier” principle which includes Third Party Reference check to ensure that contractors do not appear on the US Office of Foreign Asset Control (OFAC) list, UK Treasury lists, EU proscribed lists and UN sanctions lists;
- ii. Administering Ethical Procurement Policy for suppliers;
- iii. Controlling the use of WINET assets and stocks through internal control mechanism as outlined in the Logistics Manual and procedures.

7. WINET’s Finance and Grants Management Department is responsible for:

Due diligence and selection of partner organizations;

Training and oversight of partner organizations (with the support of the above mentioned departments);

Project cycle management, including monitoring and evaluation to improve the relevance, quality and accountability of WINET’s programs.

8. WINET Transparency Focal Point is responsible for:

- i. Compliance with WINET procedures including Anti-Fraud and Corruption Policy;
- ii. Monitoring of this policy and adherence by staff, volunteers, partner organizations and contractors to this policy.

4.3 Reporting

In case of suspected terrorism related activity, WINET:

1. Encourages stakeholders to report suspected terrorist activity using confidential means through womeninformationnetwork@gmail.com
2. Investigates according to WINET's Anti-Fraud, Bribery and Corruption Policy and takes action accordingly;
3. Notifies the donor immediately if any link is discovered between funds, an assisted organization and a terrorist-related organization. (IMPACT, 2018)

Reference:

AAN ANTI-TERRORISM POLICY | IMPACT | Version 1 – October 2018