

OWH Anti Terrorism Policy



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1. Introduction

Established in Afghanistan in 2017, the Organization for Welfare and Humanitarian (OWH) stands as a non-governmental, non-political, non-profit, and independent entity. Founded by individuals motivated by shared concerns, OWH endeavors to address societal needs and challenges.

Registered with key Afghan regulatory bodies such as the Ministry of the Economy, Ministry of Finance, Ministry of Refugee and Repatriation, and Ministry of Public Health, OWH demonstrates its commitment to operating within the country's legal framework.

OWH actively engages in pivotal Health, Education, and Nutrition Clusters, significantly contributing to these sectors throughout Afghanistan. Since its inception, OWH has effectively executed diverse projects spanning Health, Training, Research, Pandemic/Disaster Management, Education, and other essential domains.

Bolstered by an experienced team, OWH prides itself on a successful track record of implementing projects supported by prominent international donors operating in Afghanistan. Its extensive experience spans across diverse regions of Afghanistan, enabling substantial contributions to a wide spectrum of developmental initiatives.

OWH holds a profound understanding of Afghanistan's regions and possesses extensive experience operating in various provinces, providing a comprehensive approach to addressing the country's diverse needs.

1.1 Vision Statement

"A Developed, Educated, Prosperous, and Healthy community, with equal access for all."

1.2 Mission Statement

"OWH provides quality services, blending ancient wisdom with modern expertise, for an accessible and proud community."

2. Overview

This policy articulates Organization for Welfare and Humanitarian (OWH) commitment to avoiding involvement in terrorist activities, avoiding supporting terrorism and avoiding supporting individuals and organizations that support terrorism. This policy also articulates OWH's commitment to complying with Afghanistan Law on Combating Terrorism.

This Anti-Terrorism Policy is necessary to ensure that OWH funds and resources are not being used directly or indirectly to support terrorist groups or activities and to provide clear guidance on the steps to be taken if support of terrorist groups or activities is suspected. Furthermore, this policy scaffolds OWH's ability to support and deliver sustainable development projects overseas and safeguards its reputation and continued community support for delivering such development projects.

2.1 Terrorist Act

A 'terrorist act' is an act, or a threat to commit an act, that is done with the intention to coerce or influence the public or any government by intimidation to advance a political, religious or ideological cause, and the act causes:

- death, serious harm or endangers a person
- serious damage to property
- a serious risk to the health or safety of the public, or seriously interferes with, disrupts or destroys critical infrastructure such as a telecommunications or electricity network.

A terrorist act does not cover engaging in advocacy, protest, dissent or industrial action where a person does not have the intention to urge force or violence or cause harm to others.

2.2 Terrorist Offence

The terrorist act offences mean it is an offence to:

- commit a terrorist act
- plan or prepare for a terrorist act
- finance terrorism or a terrorist
- provide or receive training connected with terrorist acts
- possess things connected with terrorist acts, or collect or make documents likely to facilitate terrorist acts.

A person may be convicted of a terrorist act offence if the person intends to commit one of these offences or if the person was reckless as to whether his or her actions would amount to a terrorist act. For example, a person may be found guilty of a terrorist act offence where the person intentionally prepared or planned the commission of a terrorist act but did not actually commit the terrorist act themselves. A person may still commit a terrorist act offence even though a terrorist act did not occur.

2.3 Applicability of Manual

All of OWH's project partners will be made aware of this policy and OWH's obligations under Afghanistan law and will be required to adopt similar measures in respect of funds from OWH. Therefore, funding agreements will include wording that requires the recipient organizations to adopt policies and procedures consistent with Afghanistan Government requirements.

A section on counter terrorism will be included within the Risk Management Plan of every Project Design Document.

Prior to signing any MoUs or funding agreements, details of funded entities and their office bearers will be compared to Afghanistan Government lists of proscribed entities and individuals.

Funding recipients will be required to provide detailed accounting reports, at least quarterly, showing how funds have been disbursed. These accounting reports must be audited externally by an independent audit firm. This audit must confirm the truth and accuracy of the accounting report.

OWH will immediately cease forwarding funds and withdraw all support, including provision of resources, if it has reason to believe that a project partner has breached the requirements of this policy or is found to be on the Afghanistan Government lists of proscribed entities and individuals.

3. OWH's Response

To response towards all the potential risk that could possibly be linked with the terrorist's acts, OWH will undertake the below actions:

3.1 Saying No to Terrorism

OWH renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace terrorism and will make every effort to ensure that its resources are not used to facilitate terrorist activity.

OWH acknowledges that Afghanistan Government legislation prohibits dealing with terrorist organizations and/or persons or entities. OWH acknowledges its obligations under these laws and therefore will exercise all reasonable care and make every reasonable effort to ensure that its funds and program activities are not misused to further terrorism or support terrorist activities.

3.2 Identification of Risk

As a not for profit organization operating in Afghanistan, OWH recognizes there is a risk of OWH being misused by individuals or other organizations to support terrorist activity. OWH recognizes that this risk would be increased if OWH does not exercise appropriate oversight of the delivery and operation of the projects it funds.

3.2 Compliance of the National and International Laws

The Afghanistan Government has extensive legislation around counter-terrorism. Terrorism is against the law, against Afghanistan's national interests and undermines sustainable development. OWH will use best practice principles to ensure that its activities are conducted within the context of these laws and obligations.

Besides the Law of Afghanistan, OWH also accepts UN charters against the terrorism and ensures the applicability of the counter terrorism measures to avoid any mishap.

Failure to comply with Government requirements could significantly impact the reputation of OWH as well as expose the organization to potential penalties, and OWH will bear no such activities causing this much losses.

3.3 Check on the Third parties and partners

OWH will confirm the identity, credentials and good standing of the people and organizations it supports and will check that these people or organizations are not on the prohibited lists maintained by the Afghanistan government.

OWH must ensure the identity, credentials and good standing of its partners and recipient organizations (i.e. what they do, where they operate, who are their key decision makers and staff). This procedure must also be followed in the selection process for new partners and projects.

3.4 Control Logistic Department

All employees approving procurements must ensure that the protocol for conducting screenings is followed – which includes properly screening vendors that OWH enters into transactions specially if the amount is more than 150,000 before the transaction occurs (before signing any agreement with, or transferring funds to, the vendor).

To ensure compliance with this protocol or procedure, as well as the

mandatory procurement principles, vendors should be screened prior to any invitation to bid. For open tender processes, OWH should require vendors to register an expression of interest to tender within 10 days of the tender notice being published (10 days is a recommended period) and, at that stage in the process, request that the vendor provide its owner(s) name, copy of ID or passport, and a copy of the vendor's registration documents so that anti- terrorism screenings can be conducted prior to quote submissions.

3.5 Control HR Department

During the recruitment process the candidate's background should be checked properly by contacting the previous employer and the references provided should also be checked as well. Police clearance should also be asked if any suspicion found.

3.6 Funding Process

OWH will not knowingly remit any funds to known or suspected terrorist organizations or individuals.

In the transfer of funds, OWH will use only reputable banks and other financial Institutions. OWH will ensure that the funds transfer is managed in the best possible manner.

3.7 Reporting to Authorities

OWH will report any known or suspected terrorist links to the relevant national authority.

4. Responsibilities of Staff and Partners

OWH Board is committed to compliance with Afghanistan Law on Combating Terrorism to avoid dealing with individuals and organizations associated with terrorism. The Board is responsible for the review of this policy and making any required amendments.

OWH Board of Directors is responsible for distributing and explaining this policy to all OWH employees and partners and ensuring that they carry out the following procedures to minimize the risk of supporting terrorist organizations or individuals. This includes the induction process for new staff also.

Throughout its policy OWH uses the term Partners for those organizations with which OWH has formed alliances in Afghanistan because OWH has communicated its vision, mission, values, policies and expectations with respect to sustainable development and whose own

vision, mission, values, policies and development goals are congruent with those of OWH.

5. Message by the Management Team

OWH management team is thankful to all the employees for their effort in the finalization of the policy and for bringing the Organization to this position.

Thank you for everything you do for making OWH a successful and terrific place to work.

OWH believes that all the rules and regulation must be formed to the best interest of the Organization, the sector of its operation and to the wider population.

6. Revision of the Policy

OWH reserves the right to revise, modify any or all clauses of this policy depending upon the need of the day and after making discussion in the board meetings.