



ANTI-TERRORISM POLICY

2025

Health Education and Development Society (HEADS)

Abstract

This policy outlines HEADS' commitment to preventing terrorism financing and money laundering by enforcing strict compliance, due diligence, and financial controls. It applies to all individuals and entities linked to HEADS activities. Revised in January 2025, the policy is valid for one year and will be updated if national or global regulations change.

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Health Education and Development Society (HEADS) Anti-Terrorism Policy

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Health Education and Development Society (HEADS)



[Signature]

1. Background

The Health Education and Development Society (HEADS) is a non-profit, non-political organization registered in Pakistan under the Societies Act of 1860. Since 2013, HEADS has been a driving force in developmental and humanitarian efforts, guided by a skilled Board of Governors with diverse expertise. The organization is also registered in Afghanistan, with an active office in Kabul, extending its reach across borders.

HEADS is dedicated to addressing critical community needs through programs in education, health, protection, livelihoods, community infrastructure, shelter, capacity building, research, and governance. Its initiatives also include promoting gender equality, legal counseling, referral mechanisms, social accountability, and the right to information.

The organization integrates cross-cutting themes like social mobilization, gender inclusion, and resilience into its core programs, ensuring a holistic and sustainable approach to community development. HEADS' commitment to transparency, accountability, and efficiency underpins its mission to create lasting, positive change in the lives of the communities it serves.

HEADS operates in diverse regions to respond humanitarian crises, improve access to social services, and sustainable development. However, the organization acknowledges the inherent risks of funds and resources being diverted to finance or support terrorism. As global anti-terrorism efforts intensify, HEADS is committed to aligning with national and international frameworks to prevent misuse of its resources.

This policy serves as a cornerstone of HEADS' governance, aiming to protect its reputation, donors' trust, and the communities it serves. The policy integrates anti-terrorism measures into broader risk management strategies, ensuring compliance with all relevant regulations and best practices.

2. Policy Statement

HEADS unequivocally condemns all forms of terrorism and is committed to:

- Preventing the misuse of funds, assets, or resources for terrorist activities.
- Ensuring compliance with anti-terrorism laws and donor regulations.
- Promoting ethical practices across all levels of the organization and its partnerships.
- Acting swiftly and transparently in cases of suspected terrorism-related activities.

HEADS will implement robust systems to identify, mitigate, and respond to potential risks, fostering accountability and trust with stakeholders.



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3. Scope

This policy applies to:

- HEADS board members, management, staff, volunteers, and interns.
- Contractors, suppliers, consultants, and financial service providers.
- Partner organizations, including their board members, staff, volunteers, and sub-grantees working on HEADS-funded projects.
- Any individual or entity associated with HEADS activities.

4. Guiding Principles

HEADS' approach to combating terrorism financing is guided by:

1. **Integrity:** Upholding transparency, honesty, and accountability in all operations.
2. **Compliance:** Adhering to international standards, including UN Security Council Resolutions (e.g., S/RES/1373), and national laws.
3. **Collaboration:** Engaging stakeholders to ensure mutual adherence to anti-terrorism standards.
4. **Sustainability:** Balancing stringent controls with the delivery of effective and impactful programs

5. Mechanisms to Fight Terrorism

5.1. Approach

HEADS adopts a comprehensive strategy focused on prevention, detection, response, and continuous improvement. Key elements include:

- **Risk Analysis:** Regular assessments of geopolitical, legal, and operational risks, including stakeholder mapping to identify vulnerabilities.
- **Code of Conduct:** A mandatory code for staff and partners prohibiting financial or material support to terrorist entities.
- **Screening Processes:** Vetting all partners, suppliers, and stakeholders using internationally recognized watch lists.

5.2. Governance and Accountability

- Establishing a dedicated Anti-Terrorism Compliance Committee (ATCC) to oversee implementation and adherence.
- Conducting regular internal and external audits to ensure compliance.
- Integrating anti-terrorism protocols into broader governance frameworks, including fraud prevention and data protection policies.



5.3. Financial and Partner Safeguards

- **Financial Controls:** Maintaining detailed, auditable records of all transactions. Implementing a multicurrency accounting system to track and trace funds.
- **Procurement Integrity:** Applying the “know your supplier” principle, ensuring contractors and suppliers comply with anti-terrorism regulations.
- **Partner Oversight:** Conducting due diligence and third-party checks on all partners and sub-grantees, coupled with regular capacity-building training.

5.4. Reporting and Response

- Establishing a confidential reporting mechanism ([insert email or hotline]) for suspected terrorism-related activities.
- Responding promptly to reports by initiating investigations aligned with the Anti-Fraud and Corruption Policy.
- Notifying donors and relevant authorities immediately if links to terrorism are identified.
- Implementing corrective actions, including termination of contracts and legal reporting.

5.5 Anti-Money Laundering (AML)

HEADS recognizes that terrorism financing can be facilitated through money laundering schemes. Therefore, the organization is committed to identifying and mitigating risks related to money laundering through the following measures:

5.5.1 Compliance with Laws and Standards

HEADS complies with national anti-money laundering laws and regulations, as well as international standards including those established by the Financial Action Task Force (FATF).

5.5.2 Risk-Based Approach

HEADS adopts a risk-based approach to assess the likelihood and impact of money laundering activities across its operations, partners, and funding mechanisms.

5.5.3 Due Diligence and KYC (Know Your Customer)

Enhanced due diligence will be conducted for all financial transactions, vendors, donors, and implementing partners. This includes verifying the identities, backgrounds, and legitimacy of all parties involved.

5.5.4 Financial Monitoring and Record-Keeping

HEADS ensures that financial transactions are transparent and traceable. All records will be maintained for at least five years in accordance with applicable regulations.



5.5.5 Training and Capacity Building

Targeted training on AML regulations and red flags will be provided to finance staff, program managers, and relevant personnel.

5.5.6 Internal Reporting Mechanisms

Any suspicion of money laundering activities must be reported immediately through HEADS' confidential reporting mechanism. These reports will be investigated in collaboration with relevant national authorities.

5.5.7 Non-Engagement Clause

HEADS will not engage with any individual or entity suspected or found to be involved in money laundering, and reserves the right to terminate contracts or agreements upon such findings.

6. Training and Awareness

HEADS recognizes the importance of equipping its team and partners with the knowledge and tools to identify and mitigate terrorism-related risks. Key initiatives include:

1. **Regular Workshops:** Training sessions on anti-terrorism policies, procedures, and legal obligations.
2. **Guidelines and Resources:** Providing accessible materials, including FAQs and best practice guides, to stakeholders.
3. **Simulated Exercises:** Conducting mock scenarios to test and improve response mechanisms.



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Policy Review & Update Record

A Board meeting was held on January 6, 2025, with the key agenda of reviewing and updating all organizational policies of HEADS. The Board advised the management to undertake a comprehensive policy review to ensure relevance, compliance, and alignment with organizational goals and evolving operational needs.

In line with this directive, all organizational policies were reviewed and amended on January 31, 2025, under the leadership of the Executive Director and with the involvement of the Finance & Audit Committee and relevant departments.

The review process included:

- A thorough evaluation of existing policies.
- Revisions based on internal assessments, audit findings, regulatory requirements, and best practices.
- Incorporation of feedback from staff and stakeholders.
- Updates to enhance clarity, accountability, and operational effectiveness.

Means of Verification:

Revised policy documents, review reports, and documented feedback and approval records.



(H E A D S)

Raza Ullah Jan
Executive Director

BOD Meeting Minutes

Date: January 06, 2025

Participated by:

Raza Ullah Jan	Executive Director
Uzma Amin	Chairperson Board
Samina Khanam	Board Member
Nawaz Ali Shah	Board Member
Amabareen Banori	Board Member
Muhammad Jidran	Board Member
Abid Ali	Board Member
Tahira Nasreen	Board Member
Sayed Ali Shah	Director Program
Asif Ali	Director Finance
Ramsha Khan	HR Officer

Agenda Items:

- Change in Leadership position
- Formation of the Annual Report, Annual Budget, and Strategic Plan.
- Completion of the NDRMF Capacity Improvement Action Plan.
- Processing for Charity Commission in Balochistan and Khyber Pakhtunkhwa.
- Revision of HEADS policies.
- Renewal of Society Act Registration for 2025.

Proceedings & Outcomes:

The meeting commenced with the recitation of the Holy Quran, followed by a formal welcome note delivered by the Chairperson, Ms. Uzma Amin, and the Executive Director, Mr. Raza Ullah Jan. The discussions focused on the agenda items and organizational improvements.

- The Board decided to shift Mr. Raza Ullah Jan from the position of Chairperson of the Board of Directors (BOD) to Executive Director of HEADS, following the resignation of Ms. Samina Khanam from the role of Executive Director. Ms. Khanam has now joined the Board as a Board Member. Additionally, Dr. Uzma Amin has been appointed as Chairperson of the Board, effective immediately.
- The Board emphasized the importance of preparing Annual Report/ Annual Budget and Strategic Plan to assess the organization's current standing and plan strategically for the upcoming year.
- As HEADS has been conditionally accredited by the National Disaster Risk Management Fund (NDRMF) for six months, the Board reviewed the shared Capacity Improvement Action Plan. It was decided to prioritize its completion within the stipulated timeframe, recognizing this as a crucial opportunity for the organization.

- The Board agreed to initiate the process for Charity Commission registration in Balochistan. Police verification for the Charity Commission in Khyber Pakhtunkhwa will be expedited to obtain the certification promptly.
- A comprehensive review of organizational policies was conducted. The Board proposed and approved necessary amendments to align with current needs and best practices.
- It was noted that the Society Act Registration expired in December 2024. The Board resolved to apply for its renewal for 2025 without delay.

The meeting concluded with a thorough review of the agenda items, ensuring they aligned with the organization's strategic objectives. The Board expressed optimism about the successful execution of the discussed initiatives. The Chairperson concluded the meeting with a vote of thanks.

Signed on this Monday January 06, 2025 by authorized signatory.



Dr. Uzma Amin
Chairperson Board



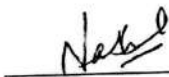
Mr. Raza Ullah Jan
Executive Director



Ms. Samina Khanam
BOG Member



Mr. Muhammad Jidran
BOG Member



Mr. Nawaz Ali Shah
BOG Member



Miss. Ambareen Banori
BOG Member



Mr. Abid Ali
BOG Member



Miss. Tahira Nasreen
BOG Member



Mr. Sayed Ali Shah
Program Director HEADS



Mr. Asif Ali
Director Operations HEADS



Miss. Ramsha Khan
HR Officer

