VISION ACTION COUNTER-TERRORISM POLICY

CEO Foreword

Vision Action operates in complex environments where the risk of humanitarian activity being misused for illegal purposes must be taken seriously. This Counter-Terrorism Policy reflects our commitment to the highest standards of governance, accountability and ethical practice across all our work.

The Board of Trustees and senior management take their responsibilities under UK law and Charity Commission guidance very seriously. We are committed to ensuring that Vision Action's resources, partnerships and programmes are protected from terrorist abuse, and that any concerns are identified, reported and addressed promptly.

This policy sets out clear expectations for trustees, staff, volunteers, consultants and partners. It reinforces our duty to comply with applicable counter-terrorism and sanctions requirements, while supporting the delivery of sustainable eye care services in a responsible and transparent manner.

All those working with or for Vision Action are expected to understand and adhere to this policy, and to raise concerns without delay where risks or suspicions arise.

Tiwonge Mwase-Vuma
Co-CEO

Jale Canlibalik
Co-CEO

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Vision Action – Registered Charity No. 1081695 (England & Wales)
Companies House registration No. 4027804 (England & Wales)

VISION ACTION COUNTER-TERRORISM POLICY

1. Purpose & Scope

Vision Action is committed to preventing the misuse of its resources, funds, activities and reputation for terrorist purposes. This policy sets out the organisation's responsibilities, controls and procedures to ensure compliance with UK counter-terrorism and sanctions legislation, Charity Commission requirements, and relevant donor obligations.

This policy applies to all Vision Action activities in the United Kingdom and internationally, and is binding on all trustees, employees, consultants and volunteers. It also applies to partner organisations, contractors and affiliates engaged in delivering activities on Vision Action's behalf.

2. Policy Statement

Vision Action **will not** knowingly or recklessly provide direct or indirect support, financial or otherwise, to any terrorist organisation, proscribed group, designated individual or entity.

Vision Action **will take all reasonable steps** to:

- Prevent terrorist abuse of its funds, assets, staff, beneficiaries or programmes;
- Identify, assess and manage risks related to terrorism;
- Act promptly where concerns or suspicions arise.

3. Trustee and Senior Management Responsibilities

The Board of Trustees has ultimate responsibility for oversight of counter-terrorism risk and compliance.

Trustees and senior management must:

- Ensure appropriate policies, controls and risk management systems are in place;
- Exercise proper control over financial affairs and maintain accurate records;
- Ensure compliance with all applicable law and regulatory obligations;
- Report serious incidents to the Charity Commission in accordance with its guidance.

Trustees must not engage in conduct that could reasonably lead the public to conclude that Vision Action supports or is associated with terrorism or a proscribed organisation.

A designated person may not act as a trustee. If an existing trustee becomes designated, they must step down immediately.

4. Due Diligence and Risk Management

a. Partner and Programme Due Diligence

Vision Action will undertake proportionate due diligence before entering into any partnership or funding agreement. This includes:

- Assessing partner organisations and key individuals against relevant terrorist and sanctions lists;
- Evaluating governance, financial controls and reputation risks;

- Documenting and approving assessments prior to signing any agreement.

b. Ongoing Monitoring

- All partnerships and programmes will be subject to ongoing monitoring.
- Counter-terrorism risks will be recorded and reviewed within the organisational Risk Register at global and country levels, at least annually.

c. Contractual Controls

- All new Memoranda of Understanding (MOUs) and agreements will include counter-terrorism compliance clauses.
- Existing agreements will be updated at renewal.

5. Staff, Volunteers and Training

- This policy will be provided to all staff, consultants and volunteers as part of induction.
- Managers are responsible for ensuring understanding and compliance.
- All personnel must confirm that they have read and understood this policy.

6. Reporting and Escalation

Any suspicion or evidence of:

- Links to terrorism;
- Terrorist financing; or
- Association with a proscribed organisation

must be reported immediately to the Co-Chief Executive Officers

The CO- CEOs will:

- Take appropriate action in line with Charity Commission guidance;
- Inform the Board of Trustees;
- Ensure reporting to the Charity Commission and relevant authorities where required;
- Suspend or terminate funding or relationships as necessary to protect the charity.

Where there is an immediate risk to life or property, the police must be contacted without delay.

Vision Action will cooperate fully with any lawful information requests from regulators or law enforcement bodies

7. Compliance with Donor and Partner Requirements

Where required by the terms of specific funding or partnership agreements, Vision Action will comply with additional counter-terrorism and sanctions requirements applicable to the funded activities concerned, including those arising from the laws of other jurisdictions.
Such requirements apply only to the relevant programmes and do not replace or override Vision Action's primary obligations under UK law.

8. Governance, Review and Breach

- Breaches of this policy may result in disciplinary action, termination of contracts or reporting to authorities.
- This policy will be reviewed at least every three years, or sooner if there are material changes to risk, law or regulatory guidance.
- The Board of Trustees retains oversight and approval responsibility.
- Advice and information on key aspects of the UK's counter-terrorism legislation and how it may affect charities and their work can be found on the Charity Commission website https://www.gov.uk/government/publications/charities-and-terrorism

ANNEX A: LEGAL AND REGULATORY FRAMEWORK

Vision Action complies with all relevant UK legislation and regulatory requirements, including but not limited to:

- the Terrorism Act 2000 and related counter-terrorism legislation;
- UK sanctions and terrorist financing regulations;
- Charity Commission guidance on Charities and Terrorism and Serious Incident Reporting.

Where relevant, Vision Action also has regard to the Terrorism (Protection of Premises) Act 2025 ("Martyn's Law") in managing risks related to the security of premises and events, as addressed within the organisation's Security Policy.

Vision Action will also comply with applicable United Nations sanctions as implemented through UK law.

When operating internationally, Vision Action will comply with relevant local laws and regulatory frameworks in the countries in which it works. Where local requirements differ from UK legal or regulatory standards, Vision Action will apply UK law and Charity Commission expectations as a minimum benchmark for governance, risk management and ethical conduct.

All such obligations apply as implemented in law and do not override Vision Action's primary responsibilities under UK legislation

ANNEX B COUNTER-TERRORISM POLICY COMPLIANCE

I have received and been briefed on the Vision Action Counter-terrorism Policy and fully understand my responsibilities to comply with and promote the Policy.

Signed	
Name	
Position within Vision Action	
Date	