



Policy paper

Summary counter-terrorism strategy

This strategy document describes the Charity Commission's role and approach in dealing with concerns about the abuse of charities for terrorist purposes and its strategy for tackling the risk of terrorist abuse in the charitable sector. The strategy builds on the commission's existing work and expertise in this area. It explains:

- how the commission deals with concerns of terrorist abuse in the charitable sector, when it might intervene, why and how and sets out its aims for the future
- how the commission works with the sector, other regulators, law enforcement and government agencies, aiming to prevent problems arising in the first place

1. The scale and the nature of the threat

Terrorism is a serious and continuing threat both to UK society, UK interests abroad and the wider international community. This threat applies to the charity sector as much as any other sector.

Terrorist involvement or association in the charitable sector are completely unacceptable and corrode public confidence in charities. The risk of links or association to terrorist activity or of terrorist abuse does not apply equally across the sector and there is no 'one size fits all' approach.

The abuse of charities for terrorist purposes may take a variety of different forms, including exploiting charity funding, abusing charity assets, misusing a charity name and status and setting up a sham charity. It may also include inappropriate expressions of support by a trustee for a proscribed organisation.

2. The role of charity trustees

All charity trustees need to be vigilant about the potential risks from terrorism, and ensure that their charity's premises, assets, staff, volunteers or other resources cannot be used for activities that may, or appear to, support or condone terrorist activities.

Whatever the charity, its size, activities and areas of operation, those with strong governance arrangements, financial controls and risk management policies and procedures that fit their needs will be better safeguarded against a range of potential abuse, including terrorist abuse.

It is the responsibility of charity trustees to safeguard their charity from terrorist abuse. The commission will support them to do this, putting an emphasis on prevention, and will ensure that charities do carry out their valued, legitimate and vital humanitarian and other work within the law.

3. What is the commission's strategy for tackling the threat of terrorist abuse on the charitable sector?

The commission's strategic objective is to identify, disrupt and prevent terrorist and other serious abuse of the charitable sector. It will do this itself and in co-operation with other relevant agencies through:

- support - encouraging and enabling the sector to build its awareness and strengthen its safeguards and defences
- supervision - through proactive regulatory oversight; and, where necessary
- intervention - using the commission's legal powers of protection and remedy

The commission's strategy has a 4 strand approach to furthering this objective and protecting charities from the risk of terrorist abuse. This approach reflects a balance between prevention, deterrence and investigative intervention. The 4 strands of its strategic approach are:

- 1. Awareness** - the commission aims to prevent abuse by raising awareness in the sector of the risks charities face from terrorism, building on their existing safeguards and ensuring that trustees take the necessary steps themselves to protect their charity from the risk of abuse and that they act responsibly if concerns arise.
- 2. Oversight and supervision** - the commission proactively monitors the sector in areas identified as being at higher risk in order to detect, at an early stage, those charities that may be facing problems and take appropriate steps to resolve the issues. The commission analyses trends and profile risks and vulnerabilities so that it can effectively target its resources to where it can have most impact.
- 3. Co-operation** - the commission continues to strengthen its partnerships with government regulators and law enforcement agencies both nationally and internationally so that it can collaborate effectively to act on identified concerns and disrupt those that seek to exploit charities for terrorist ends.
- 4. Intervention** - the commission deals effectively and robustly when abuse, or the risk of abuse, is apparent and treat allegations or suspicions of terrorist activity connected to charities, or involving individuals associated with charities, as a high priority. The commission will examine each case individually and take into account whether the trustees have acted reasonably and responsibly when deciding its regulatory response. It will use its regulatory powers where necessary and proportionate to do so.

Counter-terrorism strategy: the 4 strand approach

