



Anti Fraud and Corruption Policy



সোসিও-ইকোনমিক এন্ড রুঁরাল এ্যাডভান্সমেন্ট এসোসিয়েশন (সেরা)



Code of Conduct

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1. INTRODUCTION

The Managing Authority (MA) of SERAA is strongly committed to maintain high legal, ethical and moral standards, to adhere to the principles of integrity, objectivity and honesty and wishes to be seen Anti Fraud and Corruption opposed to fraud and corruption in the way that it conducts its business. All members of staff are expected to share this commitment. The objective of this policy is to promote a culture which deters fraudulent activity and to facilitate the prevention and detection of fraud and the development of procedures which will aid in the investigation of fraud and related offences and which will ensure that such cases are dealt with timely and appropriately.

This document sets out the policy and procedures of (Organization) against fraud and other forms of dishonesty, together with the steps that must be taken where any of these practices is suspected or discovered.

It applies to Directors, staff and volunteers. Anybody associated with (Organization) who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

2. AIM AND OBJECTIVES

The aim of the policy is as below:

- Maintaining cost effective procedures to deter fraud;
- Taking firm action against any individual or group perpetrating fraud;
- Encouraging SERAA employees, co-operant's, grantees, and those obtaining benefit from SERAA resources to be vigilant and to report any suspicion of fraud with in stipulated time.
- Suitable channels of communication will be provided and sensitive information will be treated appropriately.

3. POLICY STATEMENT

3.1. Individuals are employed by the Organization to carry out work for the SERAA. They are entitled to demand conduct of the highest standard from employees and to receive a high quality of service. An employee must, at all times, act in accordance with the trust that the public is entitled to place in them.

3.2. The aim of the Code of Conduct is to set standards that must be maintained and improved upon.

3.3. Failure to observe any provision of the Code of Conduct may render an employee liable to disciplinary measures and depending on the circumstances may be viewed as misconduct or gross misconduct under the Organization's Disciplinary Policy.

3.4. Employees must bring any deficiency in the provision of service or any impropriety or breach of procedure to the attention of their immediate line manager or, if not appropriate to Human Resources.

3.5. Any employee who is in doubt about an aspect of this Code should seek guidance from their line manager if appropriate, or Human Resources.

4. SCOPE

4.1. This policy applies to all employees of SERAA



5. STANDARDS

5.1. All employees are expected to give the highest possible standard of service both to the organization and target group.

5.2. An employee must perform their duties with Respect to following issues

- Honesty
- Professionalism
- Integrity
- Courtesy
- Efficiency
- Objectivity

5.3. Where it is part of employees' duties to provide advice to other employees and Organizations this advice must be impartial and appropriate.

5.4. All employees must comply with the Organization's Equality Policy Statement.

5.5. All employees and members of the target beneficiaries have the right to be treated with fairness and dignity. The Organization is fully committed to ensuring no individual suffers harassment or is treated unfavorably on the basis of any of the protected characteristics.

5.6. The nine protected characteristics are:

- Age
- Disability
- Gender Reassignment
- Marriage
- Pregnancy and maternity benefit
- Race
- Religion or belief
- Sex
- Sexual orientation

5.7. Employees have a duty to establish and maintain effective professional relationships with:

- The local community and service users
- Fellow employees
- Members of organizations' Executive Committee Member
- Beneficiaries/Project Participation

5.8. Employees serve the Organization as a whole and must serve all stakeholders. Employees must ensure that the individual rights of all stakeholders are respected.

5.9. Employees must ensure that no overt close personal familiarity with organizations takes place as this can lead to perceptions of favoritism or bias. Employees who enter into a personal relationship with a Executive Committee Member should declare this to their line manager at the earliest opportunity.

5.10. Orders and contracts should be awarded on merit, by fair competition against tenders, and no favoritism shall be shown to businesses run by, for example, friends, partners or relatives. Please refer to the Organization Constitution and Contract Procedure Rules for more information.

6. ACCOUNTABILITY

6.1. All employees are responsible for their actions during the normal working day and outside of working hours if it brings the Organization into disrepute. In considering the employees actions, the Authority will take into account the publicity, role and duties of the employee and will respond in a proportionate and reasonable manner.

6.2. Employees must comply with all

- Legislation,
- Terms and conditions and
- Other written guidelines such as the Organization's policies and service specific procedures.
- Professional codes and/or standards of practice that are required by an employee who is a member of a professional institute or association.

6.3. The public perception of the Organization is very important therefore employees should be suitably dressed for their duties and responsibilities at all times. This includes wearing appropriate safety clothing and equipment in accordance with all Health and Safety regulations.

6.4. To prevent security breaches the Organization has an Identification Card scheme for all employees and every employee is entitled to request a card.

Employees should ensure that they have their ID card with them at all times and if challenged by an appropriate person i.e. another Organization employee or Organization's Member, they are to show the ID card to confirm their identity.

7. DISCLOSURE OF INFORMATION AND THE DUTY OF CONFIDENTIALITY

7.1. It is generally accepted that "Open Administration" is best. Open Administration data is data that can be used, re-used and distributed freely.

7.2. The law requires that certain types of information must be available to:

- Stakeholder,
- Auditors,
- Government departments,
- Service users
- The public and
- The beneficiaries

7.3. All information held by the Organization must be kept in accordance with the Data Protection Act.

7.4. Employees must comply with Organization policies that are in place to ensure that information is handled and managed in accordance with relevant legislation, confidentiality and security standards.

7.5. The duty of confidentiality applies to all staff no matter what their function or capacity within the Organization. A breach of confidentiality may be considered a disciplinary matter. However, employees who suspect wrongdoing and disclose these concerns can do so without fear of victimization, subsequent discrimination or disadvantage in line with the Organization's Whistle blowing Policy.



7.6. Employees must not:

- Disclose information given to them in confidence by anyone, or information acquired which they believe is of a confidential nature, without the consent of a person authorized to give it, or unless they are required by law to do so.
- Uses any information did not obtain in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way.
- Any particular information received by an employee from a fellow employee which is personal to that person and does not belong to the Organization, should not be divulged by the employee without the prior approval of that person, except where the disclosure is required or sanctioned by law.
- Disclose information concerning an employee's private affairs to any person outside the service of the Organization without the consent of the employee, nor to anyone within the Organization unless that person has authority or responsibility for such information

7.7. Employees should use their discretion to determine the appropriateness of where they hold conversations of a confidential nature (particularly when using a touchdown point or in a public place such as a bus or train carriage, for instance when using a mobile phone).

8. MEDIA CONTACTS

8.1. Employees must not make statements to the media, or any other public statement which concerns the business of the Organization unless

- They have been authorized by the Director to act generally as a spokesperson or
- Have been expressly authorized to act as a spokesperson in relation to a particular situation.

8.2 All communications should be agreed and distributed through Executive Director.

9. INVOLVEMENT IN POLITICS

9.1. Since SERAA is registered as non political organization, so political activities within the organization is strictly prohibited.

10. APPOINTMENT AND OTHER EMPLOYMENT MATTERS

10.1.SERAA Human Resource Policy provides that all appointments should be made on merit.

10.2. In order to avoid any possible accusation or perception of bias, employees should not be involved in:

- An appointment where they are related to an applicant, or have a personal relationship outside work with him or her.
- Decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner or close friend.

10.3. The Organization's approach in the "Employing people who are related policy" is that no person should be appointed into a post where they either have a close relative working in the chain of line management or where they would be required to work together in a small team.



10.4. It is also a fundamental principle that no related person should be appointed to a Organization job where one is involved in the ordering of goods and services and the other passes the invoices for payment.

10.5. Included in the term relative / 'people who are related' are:

- Parent/child/step child/in-laws;
- Brother/sister (including step brother/sister); or
- Grandparent/grandchild.
- Aunt/uncle
- Niece/nephew, or
- The husband, wife

10.6. Any other close personal relationships which may arise at work should also be taken into account.

10.7. It is a requirement of all job applicants to declare whether they are related to an existing employee or member of the Organization.

11. OUTSIDE COMMITMENTS

11.1. Employees must ensure that their private activities do not conflict with their employment. Any employee, who wishes to take secondary employment, whether it is internal or external, must obtain written authorization to do so. Secondary employment must not present a conflict of interest or weaken public confidence in the Organization.

11.2. An employee's obligations when proposing to pursue outside employment are covered in the policy on Secondary Employment.

11.3. Employees should follow the Organization's rules on the ownership of intellectual property or copyright created during their employment.

11.4. Employees must consider whether any membership or proceedings they participate in that require a commitment or allegiance to support I advance fellow members is compatible with their job i.e. no conflict of interest. Employees should consider whether they need to declare membership of such organizations to their Director/Executive Director.

12. DRUG AND PUBLICATION POLICY

12.1. The Organization has a policy on the Prevention of Alcohol and Drug misuse, which is aimed at ensuring that employees report fit for work and remain fit to perform their duties. The consumption of alcohol is not permitted on Organization premises. The Organization prohibits the use, possession, distribution or sale of drugs (which is controlled by narcotics Department).

12.2. Employees must never publish or disclose any information on any form of social media site, about the Organization which is not already in the public arena.

13. SEPARATION OF ROLES DURING TENDERING

13.1. Employees should be clear on the separation of their roles within the Organization during the tendering process and must exercise fairness and impartiality when dealing with all customers, suppliers, contractors and subcontractors.



13.2. Employees who are privy to confidential information on tenders or costs for either internal or external contractors should not disclose that information to any unauthorized party or organization.

13.3. Employees must ensure that no special favor is shown to current or recent former employees or their partners, close relatives or associates in awarding contracts to businesses run by them or those employing them in a senior or relevant managerial capacity.

14. CORRUPTION

14.1. Employees must be aware that it is a criminal offence for them corruptly to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favor or disfavor to any person in their official capacity. It is for the employee to demonstrate that any such rewards have not been corruptly obtained. Please see the Organization's Anti-fraud and corruption policy for more information.

15. USE OF FINANCIAL RESOURCES

15.1. An employee must:

- Use any donor funds entrusted to or handled by themselves in a responsible and lawful manner, ensuring value for money to the local community and avoiding legal challenge to the Organization.
- Not make personal use of property or facilities of the Organization unless
- Properly authorized to do so.
- Employees should have regard to the Organization's Standing Orders and
- Financial Regulations.

16. PATENT AND COPYRIGHT

16.1. Patent

Any matter, item or idea capable of being patented under the Patents Act, which is developed or discovered by an employee, alone or together with Colleagues, in the course of their duties, must be disclosed to their manager, and, subject to provisions of the Act, belongs to the Organization. It is the responsibility of the Organization in the first instance to decide whether to apply for patent or other protection in law for any invention, which belongs to the Organization by virtue of the Patents Act.

16.2. Copyright

All records, documents and other papers relating to the finance and administration of the Organization and which are compiled or acquired by an employee in the course of their employment are and will remain the property of the Organization, and the copyright in all such cases belongs exclusively to the Organization.

16.3. Care and Use of Organization Resources Organization resources, whether tangible assets such as materials, equipment and cash, or business information such as trade secrets, may not be used other than for the proper advancement of the business of the Organization. All equipment belonging to the Organization should be treated with due care and respect. Any employee wishing to use an item of equipment, for example a photocopier, word-processor or printer, for business other than that of the Organization, must gain permission from the Director in advance.



17. SECURITY AND USE OF COMPUTER DATA/EQUIPMENT

17.1. The information stored and processed on the information technology systems operated by the Organization is of paramount importance to its day to day activities. It is therefore essential that the data and systems are adequately secured against risks such as operator errors, theft of equipment, unauthorized access to or copying of program, use of unauthorized software on Organization machines (which increases the risk of importing computer viruses) and natural hazards such as fire, flood and power failures.

17.2. It should be noted that employees must endeavor to ensure that no unauthorized person gains access to equipment/data, which is within their responsibilities.

17.3. User identifications and passwords must not be disclosed to anyone, and passwords must be changed regularly to a previously unused password.

17.4. Misuse and time wasting is unacceptable and personal messages should be kept to a minimum.

17.5. Occasional reasonable use for private e-mails will be allowed subject to the prior consent of the officer's line manager.

17.6. The tone and content of messages should be appropriate and consistent with any other form of Organization communication.

17.7. There should be no access to sites, which have a terrorist, offensive, sexual or game playing/gambling content. Access to the internet is monitored on a regular basis.

18. HOSPITALITY

Acceptance of hospitality can very easily be perceived by the public as evidence of undue influence or corruption. SERAA employees should be particularly careful to ensure that such an impression is not created even if this means departing from what is normal behavior in the private sector and declining well-meant invitations and thus giving offence.

19. VISITING TENDERERS AND SUPPLIERS

19.1. Visits to tenderers and suppliers is a matter of particular sensitivity. Officers should always be cautious and should ensure that they are not laying themselves open to actual or perceived undue influence. It is a matter of particular concern during the actual procurement process when visits are not generally permitted. If it is absolutely necessary to visit, the following procedures must be adhered to.-

19.2. The need to visit tenderers should be identified early in the tendering process and must be referred to in the tender documentation. Otherwise,

- The Director or Chief Executive (if a Director is to visit) must provide written authorization
- A detailed report must be presented to the Director/Chief Executive immediately after the visit,
- There must be more than one employee on any visit,
- It is important that the SERAA meets the cost of the visit and anything that could be construed as being an inducement, including gifts or hospitality, must be declined.



20. FUNDING- GIVING AND RECEIVING

20.1. Where the Organization wishes to sponsor an event or service neither an employee or any partner or relative must benefit from such sponsorship in a direct way without there being full disclosure to a Director of any such interest. Similarly, where the Organization through sponsorship, grant aid, financial or other means, gives support in the community, employees must ensure that impartial advice is given and that there is no conflict of interest involved.

21. POLICY MONITORING

21.1. The Organization will monitor the application of this policy and has discretion to review it at any time through the appropriate consultation mechanisms.

21.2. Responsibility for the implementation, monitoring and development of this policy lies with the Head of Human Resources. Day to day operation of the policy is the responsibility of nominated officers who will ensure that this policy is adhered to.

FRAUD INVESTIGATION PROCESS

1. Whistle Blowing (Informal and/or Formal by any Person) to Team Leader (PC)/ NGO Focal Person
2. PC, Focal Person will inform to Executive Director, SERAA
3. Formation of Fraud Detection Committee by the Director, SERAA
4. Primary Investigation by Fraud Detection Committee
5. Prepare Primary Report by Fraud Detection Committee and Submit to Executive Director (if the Primary Report is Positive)
6. A notice would be send to the defender for his self dependence within a certain period.
7. Director will take necessary Action