

Anti-Fraud, Anti-Corruption & Anti Bribery Policy



Samagra Sikchhan Evam Vikas Sansthan



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Anti-Fraud, Anti-Corruption & Anti Bribery Policy

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the organization's operation is conducted in a socially and ethically responsible manner

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is the policy of SSEVS to conduct all of development operations in an honest and ethical manner. SSEVS takes a zero- tolerance approach to bribery and corruption. It is committed to acting professionally, fairly and with integrity in all its operations and relationships wherever SSEVS operates and implementing and enforcing effective systems to counter bribery. SSEVS will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

3. Scope

3.1 Who is covered by the policy?

This policy applies to all staff working at all levels, including director, program manager, project coordinators, team leaders, block coordinators, agriculture expert, livestock expert, child protection expert, community workers, teachers, entitlements coordinators, consultants, interns, researchers, contractors, auditors, donors, or any other person associated with us, wherever located.

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions

3.2 Bribes

Staff of SSEVS must not engage in any form of bribery, either directly or through any stakeholders or from any other source.

3.3 Gifts and hospitality

Staff of SSEVS must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; or

Staff may not accept any gift or hospitality from anyone.

3.4 Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to. Our strict policy is that facilitation payments must not be paid. We recognise, however, that our staff may be faced with situations where there is a risk to the personal security of a staff or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to secretary or program manager or the **safeguarding email** director@ssevs.org & **mobile number 91-7903070594**.

3.5 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper advantage.

3.6 Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, staff must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under laws and practices. No donation must be offered or made without the prior approval of the secretary. All charitable contributions should be publicly disclosed.

4. Staff responsibilities

Staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify the secretary or the safeguarding email director@ssevs.org or mobile number **91-7903070594** as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future. Any staff who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. SSEVS reserves the right to terminate our contractual relationship with other workers if they breach this policy.

5. Record-keeping

SSEVS must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. SSEVS must ensure all expenses claims relating to hospitality, gifts or expenses incurred to the donors or other stakeholders are submitted in accordance with its finance policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with donors and other stakeholders should be prepared and maintained with strict accuracy and

completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

6. How to raise a concern

SSEVS encourages to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If any of the staffs is unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with the secretary or through the safeguarding email director@ssevs.org and mobile number **91-7903070594**.

7. What to do if you are a victim of bribery or corruption

It is important that you tell the Secretary or the safeguarding email director@ssevs.org or mobile number **91-7903070594** as soon as possible if you are offered a bribe by anyone, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

8. Protection

Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. SSEVS aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

SSEVS is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the secretary on director@ssevs.org or mobile number **91-7903070594** immediately.

9. Training and communication

Training on this policy forms part of the induction process for all new staff. All existing staff will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery and corruption must be communicated to all stakeholders including the vendors, service providers at the outset of our organizational relationship with them and as appropriate thereafter.

10. Who is responsible for the policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Secretary has the primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Program Manager is responsible for ensuring those reporting to him are made aware of and understand this policy and are given adequate and regular training on it.

11. Monitoring and review

Secretary will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular evaluation to provide assurance that they are effective in countering bribery and corruption.

All staff are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the director@ssevs.org. This policy may be amended at any time.

Siddharth Kumar



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