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DEVELOPMENT WHEEL (DEW)



Anti Corruption Policy of Development Wheel (DEW)

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Anti-Corruption Policy of Development Wheel (DEW)

DEW is a nonprofit, nonpolitical and non government organization working to provide the most disadvantaged poor and marginal people to speak out for their rights to education, secure livelihoods, good healthcare and for their rights as people living with disability. Corrupt practices (the misuse of any office or authority for private gain) undermine the fairness and efficiency by which governments, NGOs, corporate and civil society organizations and local communities can respond to this voice, they deform transaction costs and destroy an open, honest and decent society.

DEW is committed to working in an ethical way through partnerships based on honesty and respect. We want to develop and maintain the highest standards of openness, integrity and accountability within the organization and in the way we work with volunteers. In particular, we want to work together to ensure that neither DEW as an organization nor any staff member or volunteer is actively corrupt, or benefiting from corrupt practices.

Anti-Corruption Policy

1. Introduction

Development Wheel (DEW) recognizes that the risk of corruption is present and may occur in the organization. It is committed to maintain the highest level of integrity in the conduct of its affairs through the adoption of corruption prevention strategies in the organization.

This anti-corruption policy sets out the full commitment of the Development Wheel (DEW) for the prevention and detection of corruption and for adherence to a culture of integrity.

2. Statement of Intent

DEW will not tolerate corruption in the administration of its responsibilities, whether from inside or outside. It expects the highest standards of conduct from staff and those who have dealings with the Division including stakeholders and the general public. It is committed to ensuring that the risks of corruption and the potential losses that might result are minimized.

3. Policy Statement

DEW is committed to promoting and adhering to the highest standards of honesty, transparency and accountability in the operations and management of the organization. Through this policy organization engages itself to fully and unequivocally adopt a ZERO-tolerance stance towards corruption and other misconduct and shall ensure conformity with the anti-corruption legislation.

4. Anti-corruption Commitment

DEW has marked the Anti-Corruption commitment developed by the country and has thus committed itself to use all available means and resources at its discarding to combat corruption in all its forms at all times including the application of appropriate prevention and detection control measures.

For the purpose of ensuring sound implementation of this policy, DEW will ensure that:

Employees have sufficient knowledge concerning the anti-corruption policy and that it is applied to all undertakings.

- Adequate controls to counteract corruption are known and used within the organization.
- There are clear procedures and systems for handling suspected cases of corruption.
- All our stakeholders are aware of the organization's anti-corruption policy.

Objectives of this anti-corruption policy:

The main objective of this anti-corruption policy is to strengthen and sustain an integrity culture within the organization. This will be achieved through:

- The setting-up of effective processes characterized by broad participation and transparency.
- Regular evaluation of corruption risks, systems and procedures.
- Ensuring that projects have clearly formulated goals, expected results as well as monitoring and follow-ups.
- Learning from experiences and continually improving organizational performance and the corporate image.

5. Scope and Applicability

This policy covers measures and practices of the DEW on preventing and combating corrupt, fraudulent, collusive or coercive practices in its activities and operations. This policy applies to management, employees as well as, consultants, suppliers, contractors, outside agencies doing business, and or any other parties having a business relationship with the DEW.

6. Definitions

For the purpose of this policy, corruption is defined as "**act of corruption**" -

(a) Means an act which constitutes a corruption offence; and

(b) Includes -

(i) any conduct whereby, in return for a performance, a person does or neglects from doing an act in breaking of his public duties;

(ii) The offer, promise, soliciting and receipt of a gratification as an inducement or reward to a person to do or not to do any act, with a corrupt intention;

(iii) The abuse of a public or private office for private gain;

(iv) an agreement between 2 or more persons to act or refrain from acting in violation of a person's duties in the private or public sector for profit or gain;

(v) any conduct whereby a person accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification for inducing a public official, by corrupt or illegal means, or by the exercise of personal influence, to do or abstain from doing an act in the exercise of his duties to show favor or disfavor to any person

7. Responsibilities for implementing the policy

The responsibility to develop and coordinate the implementation of the policy shall rest upon the Anti-Corruption Committee (ACC) established for the purpose. The ACC shall set priorities, provide advice when ethical issues arise and communicate the policy to all levels of management and staff.

The Anti-Corruption Committee (ACC) - The committee shall comprise of members from both operational and support section of the DEW as well as a representative of the Executive Director. The person identified by the organization shall lead the project and chair all meetings. The ACC shall be responsible for coordinating and implementing the anti-corruption policy. It shall develop a time-bound programme with clear and precise deliverables and related budget and execute it once approved by top management. The Division shall designate an officer to act as Secretary to the Committee. The committee shall meet on a regular basis or as per requirement, preferably every month or as decided by the Head of the ACC.

Role of Management - It is the responsibility of the Top management to promote the anti-corruption policy within the area of operation of the DEW. They are expected to actively deter, prevent and detect corruption by maintaining effective control systems and ensuring that their staffs are familiar with the policy.

Role of Employees - Each employee shall read, be familiar with and strictly comply with the policy. The organization shall ensure that each employee is provided with a copy of this policy or otherwise has on-line access.

Role of Internal Control - The Internal Control has the responsibility to ensure the effectiveness and adequacy of the Internal Control System in place. It should ensure that the system is subject to regular audit to provide assurance that they are effective in countering corruption opportunities.

8. Risk Assessment

The organization is conscious that the risk of corruption may occur in every sphere of its activities and may evolve in the light of changing circumstances and working environment. In its endeavor to proactively address risks of corruption, DEW shall ensure that a proper risk management process is in place. Risk assessment should focus on a thorough analysis of the functional activities in close collaboration with officers involved in the process with a view to identifying potential or actual corruption risk areas. With respect to risk identified necessary corruption prevention measures including policies and procedures should be developed to address the risks. The responsibility to plan, coordinate and monitor the risk management process rests with the ACC.

9. Handling and reporting corruption

Reporting suspected cases of corruption - Any officer/staff members of this organization suspects that an act of corruption has been committed within or in relation to his area, he shall forthwith make a written report to the authority, the organization shall put in place measures that shall facilitate the reporting of suspected cases. The Executive Director of this organization is of the opinion that an act of corruption may have occurred, he may refer to the ACC for investigation. DEW may set up a committee to assist the officer in determining whether there is reasonable doubt for suspicion of corruption prior to transfer of the case to the authority for investigation.

Confidentiality - Information pertaining to complaints shall not be disclosed to any unauthorized party.

10. Protection of whistleblowers

There will be no payback by management against “the public official” who in good faith reports an act of corruption or misconduct or suspected illegal and dishonest activity or any activity that he/she has witnessed. However, disciplinary actions may be taken against any person who knowingly had made false allegations.

11. Disciplinary measures

DEW is committed to ensuring that this policy is duly implemented in the organization. Disciplinary measures in accordance with established procedures will be taken against any staff that is found guilty of a breach of the provisions contained in this policy.

12. Training and Communications

DEW recognizes that the success and credibility of this policy depends on effective training, communications and the awareness of employees. Management should ensure that the anti-corruption policy is clearly disseminated to all staff and that its contents are understood.

13. Right to Information

DEW respects present RTI policy of the Government and organization assigned one RTI officer on behalf of the organization to provide all the information's to other stakeholders and the authorities. DEW also believes on open society.

DEW is committed to ensure transparency and accountability in all level of the organization. DEW respects and takes steps to disclose overall information regarding organization, its development activities, audit reports, annual reports and best practices of the organization to general people, donors, and government bodies to ensure transparency and accountability of the organization.

14. Review of policy

This policy will be reviewed annually or earlier if necessary or in the event of any changes in the laws and regulations that are relevant to the Development Wheel (DEW). The Head of the ACC should recommend the review to the Executive Director of DEW.